



Vulnerable Residents and Reasonable Adjustments Policy

This policy was produced in 2026 and is version 3.0

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Review Frequency: MDH will review this Policy every 5 years and as required to address legislative, regulatory, best practice or operational issues. However, the Head of Housing and Health is given delegated authority to make minor amendments to the Policy as required by legislative changes, formal guidance or local operational considerations.

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1 Introduction

- 1.1 Mid Devon Housing (MDH) recognises that residents can face situations that may make them vulnerable either on a permanent or temporary basis and to varying degrees and that barriers may exist that may limit their ability to access our services.
- 1.2 We recognise that not all residents with disabilities or complex needs class themselves as vulnerable, but they may benefit from reasonable adjustments in order that our services are more accessible for them.
- 1.3 MDH is committed to making sure our services can be easily accessed by residents with complex and/or additional needs.
- 1.4 This policy does not aim to explain how we will approach every circumstance where a resident with complex needs a service to be adjusted. It is a general statement of our commitment to ensure residents with vulnerabilities including disabilities or additional needs are not at a disadvantage when accessing MDH services.

2 Aims and Objectives

- 2.1 The aim of the policy is to set out MDH's approach to identifying and supporting residents with vulnerabilities or complex needs by defining: -

- How we identify adults who may be vulnerable.
- How vulnerable adults can get help and access services from MDH.
- How MDH can change or adapt its services to meet the needs of vulnerable people.
- How we direct or refer residents to other organisations that can offer additional support.
- How MDH makes reasonable adjustments to ensure vulnerable residents can use our services fairly and safely.

This policy applies primarily to adult residents and is designed to address the needs of vulnerable adults. Where the circumstances of other household members impact the overall household's needs, the provisions of this policy may be extended to those individuals, as appropriate.

- 2.2 The objectives of the policy include:

- Explaining what "vulnerability" means in housing services and how we identify people who are vulnerable or have disabilities or additional or complex needs.
- Describing how we keep information about a resident's vulnerability up to date and make sure it is recorded in a consistent way.
- Setting out how MDH supports vulnerable adults, including the adjustments we make to ensure they can access the housing services they need.
- Explaining how we record information about a resident's vulnerability and how we guide residents to other support services when they might need extra help.

- Making sure we always consider the vulnerabilities, disabilities and additional or complex needs and protected characteristics of every resident.

3 Regulatory Framework and Context

- 3.1 The Social Housing (Regulation) Act 2023 applies to social housing providers and is aimed at social housing tenants.
- 3.2 The Regulator of Social Housing (RSH) Transparency, Influence and Accountability Standard, requires registered social landlords, including local authorities, to provide choices, information and communication that is appropriate to the diverse needs of tenants. Registered social housing providers are required to demonstrate that they understand the different needs of tenants, including in relation to equality and potentially vulnerable tenants.
- 3.3 The RSH regards councillors as responsible for oversight and ensuring that their local authority social housing providers are managed effectively and that providers comply with all regulatory requirements.
- 3.4 As part of the reshaped consumer regulation regime the RSH introduced a series of 22 mandatory Tenant Satisfaction Measures (TSMs) creating a new system for assessing how social housing landlords in England are performing in the provision of good quality homes and services.
- 3.5 The TSM's associated with this Policy are:
 - TP06 - Satisfaction that the landlord listens to tenant views and acts upon them
 - TP08 - Agreement that the landlord treats tenants fairly and with respect

4 Related and Relevant Policies and Legislation

- 4.1 This policy should be read in conjunction with the following Mid Devon District Council (MDDC) policies:
 - MDH Safeguarding Adults at Risk, Young People and Children Policy
 - MDH Income Management Policy
 - MDH Anti-Social Behaviour Policy
 - MDH Repairs and Maintenance Policy
 - MDH Tenancy Management Policy
 - MDH Aids and Adaptations Policy
 - MDDC Corporate Complaints and Feedback Policy
- 4.2 Relevant Legislation, Regulation and Guidance
 - Equality Act 2010 – This sets out the duties MDDC has 'to advance equality of opportunity between persons who share a protected characteristic and persons who do not share it'.
 - Housing Health and Safety Rating System Guidance – A risk-based assessment procedure used to identify potential risks or hazards to occupants in their homes. In carrying out the

assessment, consideration must be given to those who fall within the defined extra risk or vulnerable group.

- Social Housing (Regulation) Act 2023 – requires registered providers to ‘treat all tenants with fairness and respect’ and demonstrate that they understand the different needs of tenants, including in relation to the equality strands with tenants with additional support needs.
- The Housing Ombudsman Complaints Handling Code states that landlords should comply with the Equality Act 2010 and may need to adapt normal policies, procedures or processes to accommodate an individual’s needs.
- The Mental Capacity Act 2005 provides the legal framework for making decisions on behalf of people who lack mental capacity to make decisions for themselves.

5 Defining vulnerability

- 5.1 For the purposes of this policy, “vulnerability” means anyone who needs extra help or support because of considerations including poor mental health, disability, age, illness or frailty. It is intended to relate to individuals who may struggle to look after their home, manage their own wellbeing or keep themselves safe from harm or exploitation by third parties. It is further intended to support people who are coping with a major life event—such as a bereavement or crisis—and who may temporarily need more support than usual.
- 5.2 We understand that an individual’s vulnerability is not fixed and, in the majority of cases, the degree of vulnerability will fluctuate. A person’s situation can change over time, and factors such as age, disability, mental health, domestic abuse, poverty or significant life events can affect their level of vulnerability and how much support they might need.
- 5.3 We also recognise that everyone can experience periods of vulnerability at different points in their lives. For this reason, within this policy, we consider someone vulnerable if they are having difficulty managing everyday tasks in a way that affects their ability to fulfil their obligations as a tenant or to use our services without extra help. Our aim is to make sure that no one is put at a disadvantage because of their circumstances.
- 5.4 Some tenants may have specific needs that mean they require extra support. These may include, but are not limited to, people who: -
- Have a sensory impairment, such as sight or hearing loss
 - Do not speak English as their first language
 - Are socially isolated or experiencing loneliness
 - Have a physical disability or reduced mobility
 - Have a learning disability
 - Have mental health difficulties
 - Are older or more frail
 - Have alcohol or substance misuse issues
 - Are experiencing domestic abuse or harassment
 - Need support with or are unable to make certain decisions for themselves (in accordance with the Mental Capacity Act 2005)

- 5.5 A tenant may be considered vulnerable because of a single short-term incident, such as an episode of domestic abuse, or because of recurring issues such as ongoing poor mental health. Some tenants may also find it harder to use our services due to factors such as where English is not their first language.
- 5.6 Some vulnerabilities continue for the long-term, while others are linked to life events such as bereavement or domestic abuse and may only affect the person for a limited time. A person's level of vulnerability depends on how these factors combine at any given moment and how much additional support they need to help them manage their home and keep their tenancy.

6 Signs of vulnerability

- 6.1 There are several signs that may suggest that an individual may be vulnerable for the purposes of this policy. These may include, but are not limited to the following: -
- Falling into rent arrears or other debt problems.
 - Issues with fulfilling their responsibilities as tenant.
 - Being the victim, or perpetrator, of anti-social behaviour, hate crime or harassment.
 - Being party to a dispute with neighbours.
 - Damage to the tenant's home.
 - A detrimental change to a person's physical appearance.
 - A failure to respond to correspondence or to answer the door when visited.
 - Self-neglect, hoarding or other behaviour which results in the person's home and/or garden becoming damaged, neglected or otherwise unfit for occupation.

7 How MDH identifies vulnerable tenants

- 7.1 When a tenant contacts MDH, this presents an initial opportunity to identify whether they are vulnerable. A tenant can become vulnerable at different stages of their lives and therefore it is essential that existence of any vulnerability is considered not just at first contact, but throughout a tenancy and whenever contact is made.
- 7.2 Within MDH, every visit and every interaction matters. All officers, as well as repairs operatives and contractors, are trained to recognise signs of vulnerability and to record any concerns appropriately.
- 7.3 MDH can identify vulnerabilities in several ways:
- By reviewing any support needs or vulnerabilities identified in a Devon Home Choice application form.
 - At the sign-up stage for a new tenant and upon completion of the getting to know you survey.
 - During home visits.
 - On receipt of reports from relatives or care givers.

- On receipt of reports via a support agency or another external agency such as the Police or the Probation Service.
- Taking into account local knowledge gathered or observed through day-to-day housing management activities e.g. neighbourhood walkabouts, tenancy home checks and installing aids and making adaptations.
- Through tenants reporting a repair and the operative picking up a vulnerability and/or support need
- On learning of a breach of the terms of the tenancy.

8 How MDH can support vulnerable tenants

8.1 When a housing officer or another member of staff identifies a vulnerable adult, they will seek to signpost or refer the person to appropriate support if it is needed. Some of the services signposted or referred to may include, for example:

- GPs and other health services, e.g. Mental health services.
- Adult Social Services (for care and support services or safeguarding).
- Tenancy sustainment support.
- Occupational Therapists.
- Substance misuse services.
- Domestic abuse services.
- Debt advice and welfare benefit services.
- Advocacy services.

8.2 MDH may make reasonable adjustments to the way in which we usually do things to ensure we are fair to all our residents.

8.3 MDH recognises that carers, who are caring for vulnerable people in a voluntary capacity (e.g. partner, relative or friend), may also need support in fulfilling their responsibilities and in looking after their own wellbeing. Carers can be signposted, when appropriate.

8.4 MDH communicates with its tenants or service users in a variety of different ways:

- Face-to-face, including home visits or booked office appointments
- Phone calls
- Letters
- Newsletters
- Emails
- Texts
- Social media (signposting and generic messages)
- MDDC Website

- 8.5 Telephone and face-to-face language interpreting and British Sign Language interpreting services can also be provided upon request.
- 8.6 Some residents who have additional needs may not view themselves as vulnerable, or they may feel uncomfortable being recognised as such and then accepting help. In these situations, housing officers should act sensitively, respectfully and in a way that protects the resident's autonomy while still managing any risks to their tenancy.
- 8.7 Actions the housing officer can take to support these residents:
- Build trust and communicate in a supportive, non-judgmental way.
 - Explain clearly why support is offered and how it helps sustain their tenancy.
 - Focus on practical issues, not labels such as "vulnerable."
 - Offer different support options and let the resident choose what they feel comfortable with, enabling the resident to maintain a degree of control of their situation.
 - Make reasonable adjustments (e.g. preferred communication style, extra time) even if other practical support is declined.
 - Monitor concerns sensitively and check-in with the resident periodically.
 - Provide signposting information to enable residents to access help later if they want it.
 - Follow safeguarding procedures where serious risk is apparent.
 - Respect the resident's right to refuse support but explain that the offer remains open.

9 Specific Support that MDH can offer

- Identifying any support needs or requirements at sign up stage and completing referrals where necessary.
- Updating the housing management system with a marker if the tenant has a vulnerability and therefore a support need or a requirement for an enhanced service.
- Checking in with the resident post sign up – usually 6 weeks after the tenant has moved in.
- Offering Lifeline alarm services and explaining the charges for this service.
- Providing housing advice.
- Providing aids and adaptations to promote independent living, in accordance with the MDH Aids and Adaptations Policy.
- Providing additional security through the Sanctuary Scheme for tenants who are survivors of domestic abuse and wish to remain in their current home.
- Where a resident is experiencing domestic abuse, harassment or other circumstances that place them at risk, we will consider appropriate referrals, safeguarding actions, security measures and housing management responses based on the individual circumstances.
- Offering referrals to Devon Mediation Service where there are identified issues between neighbours.
- Offering clear, simple and possibly repeated explanations of decisions, processes and actions.
- Providing help with appointments and communication which could include a verbal communication to clarify requirements.

10 Recording vulnerabilities

- 10.1 We will record any known vulnerabilities, communication needs and access requirements on the tenant's record, along with details of anyone who has permission to speak to us on the tenant's behalf, such as a carer, advocate or support worker. This helps our staff understand any extra needs in advance so we can provide services appropriately.
- 10.2 At the sign-up stage, the tenant will be asked whether they have any support needs and/or any communication preferences. These will be recorded onto our internal systems and will be used to meet the tenant's specific needs throughout the duration of their tenancy.
- 10.3 As well as considering when in contact with a tenant for routine matters, we will carry out an annual survey of all tenants to confirm that any new or recorded vulnerability or additional needs information remains accurate and relevant. This survey will help us identify any changes in circumstances and ensure that the support we offer continues to meet tenants' needs.
- 10.4 If we have any safeguarding concerns, we will follow the MDH Safeguarding Adults at Risk, Young People and Children Policy. This sets out how we identify and support adults and children who may be at risk and ensures that we involve the appropriate statutory agencies as soon as a concern is raised.
- 10.5 We will use a standardised process to collect, store and use information about a tenant's vulnerabilities, ensuring that all staff record data in the same format and in the correct fields within our housing management system, and only for purposes directly related to providing safe and appropriate services to residents.
- 10.6 Where a vulnerability, communication need or reasonable adjustment has been identified, this information will be reviewed whenever there is a significant change in circumstance, when it is brought to our attention that the recorded information may no longer be accurate or when an agreed adjustment is no longer meeting the tenants needs.

11 Reasonable adjustments

- 11.1 A reasonable adjustment involves making a change to the way that we usually do things to ensure that we are fair to all of our tenants. This may involve departing from our usual practice in the way we do things if we find that the current position places that person at a substantial disadvantage. For example, we might:

- Allow more time for a tenant to respond or provide information; or
- Make sure our office buildings do not present obstacles for disabled people, for instance by providing lifts or ground floor meeting rooms; or offer a suitable alternative location.
- Provide information in large print, braille, audio tape, coloured paper or alternative language.
- Allow for more time to answer the door if someone has mobility issues.
- Use the resident's communication preferences.
- Not request communication to be made in writing where this presents a barrier or disadvantage to the customer due to their disability or additional needs.
- Provide an extension of any time limits (where it is lawful to do so).

11.2 How does MDH define 'reasonable'?

The Equality and Human Rights Commission suggests the following considerations when we decide whether an adjustment is 'reasonable' or not: -

- How effective the adjustment(s) will be in assisting a customer with a disability and in preventing or reducing the possibility of them being at a disadvantage.
- The practicality of making the adjustment(s)
- The cost of the adjustment(s) and whether this is possible within our resources; and
- Any disruption to the service that making the adjustment(s) may cause.

11.3 A reasonable adjustment can be requested from MDH in the following ways: -

- In writing, explaining what the requested adjustment is and why it is needed.
- By telephoning, writing to or emailing the MDH service.
- By referral from a support agency or external agency.
- By a family member or advocate* when we have been given permission for them to do so; and or;
- A member of staff may suggest for one to be made, when they are aware it will support the tenant's needs.

**Advocate can include independent tenant advocate, support worker, attorney, domestic abuse advocate or mental health advocate.*

12 Unreasonable adjustments

12.1 MDH will make reasonable adjustments to support tenants and residents with vulnerabilities or additional needs. However, requests for adjustments may be refused if they are disproportionate, unsafe, unlawful, outside the scope of our role, if they significantly impact other tenants or service delivery, or are not linked to a genuine need. Where an adjustment cannot be provided, we will explain the reasons and work with the tenant to identify suitable alternatives.

- 12.2 In circumstance where we are unable to make a reasonable adjustment due to cost or resources, we will work together with the tenant or resident to find the most appropriate alternative solution for them.
- 12.3 If a tenant is dissatisfied with the arrangements or decisions we have made regarding a reasonable adjustment, we will respond in accordance with our MDDC Complaints and Feedback Policy.

13 Complaints

- 13.1 We try to get things right the first time and, when we do, we would love to be told. It's great for us to receive positive comments or feedback, so if residents wish to compliment our staff for doing a great job, we would love to hear from them.
- 13.2 However, if things do go wrong the council is committed to:-
- Dealing with complaints and comments quickly and effectively; and
 - Using complaints, comments and compliments to review and improve our services.
- 13.3 When tenants contact us to tell us they are dissatisfied with the service we have provided, we will offer them the choice to have an informal conversation to see if we can put things right quickly, without the need for a formal investigation.
- 13.4 The Housing Ombudsman Service advises that a complaint must be defined as:
- 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents'.*
- 13.5 Where a tenant considers that MDH has given a poor service or has got something wrong, they may tell a member of staff in the first instance. This does not need to be treated as a formal complaint (unless the complainant asks us to do so) and may be resolved 'there and then' by way of an apology or plan of action. Any comments provided will be used to take appropriate action or to give information.
- 13.6 If a tenant does not want to do this or is unhappy with the response, they may make a formal complaint, which can escalate from stage 1 or stage 2 if they are still not satisfied with the response. If, having been through stages 1 and 2 the tenant is still not satisfied; the tenant may contact the Housing Ombudsman Service.

13.7 Where a resident has a vulnerability, disability or additional need, we will consider whether reasonable adjustments are required to ensure they can access and participate in the complaints process. This may include accepting complaints through alternative communication methods, allowing additional time for responses, providing information in accessible formats or communicating through an advocate where appropriate.

13.8 MDH's complaints procedure is detailed on MDDC website: [Feedback and Complaints](#)

14 Equality Impact Assessments

14.1 MDH completes an Equality Impact Assessment each time we develop or review a policy, procedure or service. The assessment is to help us make sure our decision making is fair and does not present any barriers or disadvantage to customers from any group (including disability) protected in accordance with the Equality Act 2010.

15 Summary of Additions and Policy Amendments

The following Policy amendments have been made:

Date	Amendment Made	Amendment Authorised by