



# Reasonable Adjustments and Vulnerable Needs Policy

## 1.0 Policy scope

1.1 This Policy defines what a 'reasonable adjustment' is, in what type of circumstances we'll make them, and how residents can request them.

It also sets out how we'll support our residents with vulnerable needs and explains how we define, assess, and record vulnerability to meet residents' needs, when necessary.

1.2 Any reference to 'we', 'our', or 'us' mean Southern Housing. Any reference to 'you' means the resident or customer.

1.3 This Policy applies to all:

- Residents
- Household members
- Prospective residents applying to rent or buy a Southern Housing home
- Former residents
- Customers.

1.4 Residents in supported housing, by the nature of the accommodation may receive different services. We'll consider the resident's individual needs and any reasonable adjustments, regardless of whether they identify as disabled, due to an existing disability or other vulnerability in line with this Policy.

1.5 The type of support we provide may depend on the type of tenancy or lease.

1.6 Where there's a risk of harm, abuse, or neglect to residents, we'll follow our Safeguarding policies ([Safeguarding Adults Policy & Safeguarding Children and Young People Policy](#)) and procedures and/or [Residents Domestic Abuse Policy](#), where necessary.

1.7 Our *Aids and Adaptations Policy* sets out how we'll provide adaptations to help residents continue to live independently in their home. An 'adaptation' is a physical alteration or addition to a home, designed to make it easier or safer for use by older people or people with a health condition or impairment.

1.8 This Policy should be read in conjunction with our [Equality, Diversity and Inclusion Policy](#).

1.9 This Policy is in accordance with:

- The [Housing Ombudsman Service's Complaints Handling Code](#)
- Our duty under the [Equality Act 2010](#)
- Our regulator's [Tenant Involvement and Empowerment Standard](#)
- Our requirements under the Financial Conduct Authority (FCA) and in particular Principle 6 of the FCA Handbook
- Our duties under [The Heat Networks \(Market Framework\) \(Great Britain\) Regulations 2025](#).

## 2.0 Policy statement

2.1 We acknowledge and understand that by having a disability, it does not automatically mean a person is vulnerable. Equally, not all our residents with vulnerable needs have a disability.

2.2 This Policy is a statement of our commitment to ensure residents with disabilities and/or vulnerable needs aren't at a disadvantage when accessing our services. It doesn't explain how we'll support or assist a resident with additional needs in every circumstance.

2.3 Our wider suite of policies and procedures will advise how service areas adapt to meet the needs of residents with additional needs and provide further support, where necessary. This support may be delivered by us or through referral to external agencies.

2.4 We're committed to being a supportive, diverse, inclusive, and equal opportunities organisation. Our colleagues receive mandatory training to embed this in all their interactions with our residents and when delivering our services.

2.5 We'll work with support workers, advocates, family members, or other professionals with disclosure authority to meet the needs of our residents and ensure any necessary support is in place.

2.6 Residents, or someone on their behalf, can make a complaint through multiple channels as detailed in our [Complaints Policy](#). We'll ask residents about their needs and any reasonable adjustments they require when dealing with a complaint.

## 3.0 How we define vulnerable needs/priority

3.1 We define a resident with vulnerable needs as someone (including a member of their household) with any condition or circumstance that either:

- Places them at risk in their home
- Puts them at risk of being unable to comply with the conditions of their tenancy or lease without additional support or intervention
- Affects their ability to access our services.

3.2 Vulnerability may be caused by personal circumstances, timing, and/or whether there's existing support in place.

This is why we'll assess vulnerable needs/priority on a case-by-case basis.

3.3 We use Ofgem's<sup>1</sup> definition of 'vulnerable' when supporting our heat network customers<sup>2</sup>:

A customer is vulnerable when their personal circumstances and characteristics combine with aspects of the market to create situations where they are:

- Significantly less able than a typical domestic consumer to protect or represent their interests; and/or
- Significantly more likely than a typical domestic consumer to suffer detriment, or that detriment is likely to be more substantial.

3.3.1 If you're a heat network customer and any permanent member of your household is vulnerable, we'll add you to our priority services register.

#### 4.0 How we'll identify vulnerable needs/priority

4.1 Residents will be asked whether they, or any household members, have any additional needs at the start of their tenancy.

4.2 During any type of contact colleagues may enquire about a resident's needs, and residents are encouraged to state their needs whenever possible.

4.3 We expect colleagues and third-party contractors to anticipate the vulnerable needs a resident may have, and that they may need support or assistance. This can be from their own observations or by using the information available to them from the resident's records.

4.4 The below indicators won't necessarily mean a resident has vulnerable needs however may mean they have additional needs. It's important for colleagues and third-party contractors to be aware of these, as early identification will mean the resident will receive any necessary help and support as soon as possible:

**Protected characteristics** – age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

**Health and abilities** – physical health impairment, sensory impairment, cognitive impairment, mental health issues, developmental condition, and addiction.

**Access and skills** – lack of language, literacy, numeracy, digital access, and technical skills.

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<sup>1</sup> Energy regulator for Great Britain

<sup>2</sup> A heat network customer receives heating, hot water, or cooling through a shared, central system rather than their own individual boiler

**Personal circumstances** – major life events such as bereavement, redundancy, loss of income, divorce or a relationship breakdown, being the victim of domestic abuse, anti-social behaviour, or harassment.

**Financial** – low knowledge of financial matters or low confidence in managing money, difficulty in enduring financial or emotional shock due to debt or a one-off unexpected expense; low or unstable income.

4.5 Other indicators of vulnerable needs and that further support or assistance could be offered to residents include:

- Anti-social behaviour as a result of mental health issues
- A repeated failure of non-engagement with correspondence or to answering the door when visited
- Hoarding, self-neglect, or other behaviours that could cause harm to themselves or their property, and their home and/or garden becoming unfit for occupation
- A detrimental change in the person's physical appearance
- Erratic and unusual patterns of rent payments and falling into arrears when the resident previously had good payment history.

## 5.0 What is a reasonable adjustment?

5.1 Under the [Equality Act 2010](#), we have a legal duty to make adjustments in the following three circumstances:

- Where there's a provision, criterion, or practice that puts people with disabilities at a substantial disadvantage<sup>3</sup> in relation to a relevant matter in comparison with people who aren't disabled
- Where a physical feature puts a person with a disability at a substantial disadvantage in comparison with people who are not disabled and/or
- Where a person with a disability would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with people who are not disabled.

5.2 A reasonable adjustment is a legal term defined by the [Equality Act 2010](#). Its purpose is to ensure all our services can be equally accessed by residents with disabilities, as well as those without. A reasonable adjustment can be:

- **A physical alteration to one of our premises**, for example, fitting a lift, wide doors, or a ramp
- **A change to one of our policies, procedures or services**, for example, a comfort or rest break in a meeting or an extension of time limits (where lawful to do so)
- **An adjustment to how we communicate** with our residents to meet their specific needs. For example, providing information in alternative formats.

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<sup>3</sup> Substantial disadvantage is defined in the Equality Act 2010 as 'more than minor or trivial'.

This list is not exhaustive.

- 5.3 We use the definition of a disability set out in the [Equality Act 2010](#). This states a person is disabled if they have a physical or mental impairment, and the impairment has a substantial and long-term effect on their ability to carry out normal day-to-day activities.
- 5.4 Many of the adjustments to our services we offer can also be made available to our residents without disabilities.

## **6.0 How to request a reasonable adjustment**

- 6.1 A reasonable adjustment can be requested from us in the following ways:
- By the resident themselves
  - By referral from a local authority or other relevant agency
  - By a family member when we've been given permission for them to do so and/or
  - A member of staff may suggest for one to be made, when they're aware it will support the resident's needs.
- 6.2 In some cases, we may seek advice from expert disability organisations that can assist with signposting and other forms of support.

## **7.0 What do we mean by 'reasonable'?**

- 7.1 The Equality and Human Rights Commission advises the following when deciding whether an adjustment is 'reasonable' or not:
- How effective the adjustment(s) will be in assisting a resident with a disability and in preventing or reducing the possibility of them being at a disadvantage
  - The practicality of us 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.
- 7.2 Where we're unable to make a reasonable adjustment due to cost or resources, we'll work together with the resident to find the best alternative solution for them.
- 7.3 If you disagree with our decision, you may be able to challenge it through our [Complaints Policy](#).

## **8.0 Communication**

- 8.1 We expect colleagues and third-party contractors working on our behalf to adjust how they communicate with residents to meet their additional needs, where necessary. This can include:
- Asking residents if they have a preferred method of communication
  - Using the resident's preferred method of communication

- Allowing more time to understand information and/or make decisions (where lawful to do so)
- Providing information in alternative formats or providing a sign language interpreter at workshops and events.

8.2 We'll support our colleagues by encouraging them to take extra time or to be flexible when responding to residents with vulnerabilities and/or additional needs.

8.3 We'll inform residents of any support available to them to meet their needs.

## **9.0 Keeping record of residents' needs**

9.1 We'll record any known vulnerability or disability on our internal systems, including any communication or access needs and whether there's anyone with delegated authority to speak to us on the resident's behalf.

9.2 If a resident or household member is recorded as having vulnerable needs or a disability, we'll use this information wherever possible to deliver services that meet their individual needs and help them access appropriate support.

9.3 We'll review this data periodically to ensure its accurate and up to date.

## **10.0 Information sharing**

10.1 When sharing information about residents, we'll comply with our [Data Protection Policy](#).

10.2 We're permitted to share information with an appropriate agency where there are overriding and serious concerns about the risk to an individual's health or personal safety. The law allows us to disclose information to, and request information from, relevant authorities where it works towards reducing crime and anti-social behaviour.

10.3 We'll communicate information about a resident's vulnerable needs or disability to our contractors whenever necessary to ensure services are delivered appropriately.

10.4 We'll respect the wishes of the resident at risk in relation to what information should be shared, and with whom, where possible.

10.5 Colleagues will always respect confidentiality and not share any information given in confidence unless justified by the assessed risk to the resident or required by law.

## **11.0 What have we done to make sure this Policy is fair?**

11.1 We've carried out an Equality Impact Assessment to consider the positive and negative impacts this Policy may have on people with protected characteristics under the [Equality Act 2010](#).

## 12.0 Review

- 12.1 We will review this Policy to address legislative, regulatory, best practice or operational issues.

<b>Policy controls</b>
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Version 1.3 – effective 2 March 2026
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