

# VULNERABILITIES AND REASONABLE ADJUSTMENTS POLICY.

We serve a diverse mix of customers and aim to ensure that we deliver services that enable our customers to sustain their tenancies. This policy sets out how we will recognise individual needs and make reasonable adjustments accordingly.

This policy may include some unfamiliar words and phrases, so we have provided a description of what they mean on page 9.

If you need any help understanding the information in this document, please give us a call on **0300 555 0600**, send us a message on WhatsApp to **07418 344 603** or send an email to **customerservices@onward.co.uk**.

Linked documents	Complaints, Financial Redress, Safeguarding Adults, Safeguarding Children, Aids & Adaptations Policy, Damp, Mould, and Condensation Policy, Responsive repairs Policy, Data Protection Policy, Equality, Diversity, and Inclusion Policy, Domestic Abuse Policy, Tenancy Management, Allocations, Data Strategy, Data & Information Policy
Date implemented	October 2025
Policy lead	Emma Wilson, Interim Executive Director of Operations
Approved by	Onward Executive Team
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## Policy overview

We serve a diverse mix of customers and must provide services that consider our customers and their family members' individual needs. Over the next few pages, we set out more detail around how we will do this.

### We will:

- Use information and observations to understand if a customer is vulnerable
- Record vulnerabilities and keep our records up to date
- Investigate gaps in access to services and ensure appropriate support is in place
- Communicate in an accessible way that is tailored to the customer
- Give customers opportunities to feedback on how accessible our services are
- Make reasonable adjustments to meet customers needs

### Customers will inform us:

- If they or a member of the household becomes disabled and/or vulnerable. Further detail on what this means is set out in this document.
- If they need support or flexibility to access our services, such as when we carry out repairs or home visits.

## VULNERABILITIES AND REASONABLE ADJUSTMENTS POLICY – FULL POLICY.

### 1. Introduction:

- 1.1. Onward is a large social landlord, providing housing to over 35,000 households and recognises that some customers and household members may, at times, face challenges in meeting their obligations. These challenges may stem from a variety of reasons, many of which are not deliberate and may be temporary or long-term in nature.

### 2. Aim:

- 2.1. This policy is intended to guide Onward colleagues, particularly those responsible for responding to instances where a customer or a household member fails to meet their obligations. **It sets out the expectation that colleagues should:**
  - 2.1.1. **Investigate the reasons** for non-compliance where possible.
  - 2.1.2. **Take those reasons into account** when deciding on an appropriate response.
  - 2.1.3. **Exercise discretion sensitively**, especially where non-compliance is linked to vulnerability.
- 2.2. To meet the diverse needs of our customers, we will provide an adaptable service which takes our customers and their family members needs into consideration ensuring we meet all legal and regulatory requirements.

- 2.3. Our aim is to ensure that customers receive a service that they need to help them sustain their tenancy/lease. Delivering reasonable adjustments to services for customers with vulnerabilities is an essential part of this aim.
- 2.4. Onward aims to use every opportunity to better understand and record customers' diverse needs including those arising from protected characteristics, language barriers, and additional support needs.
- 2.5. We recognise that satisfaction is driven in part by Onward's ability to recognise the needs of individual customers and respond accordingly.

### **3. Scope:**

- 3.1. This policy applies to all Onward Homes' customers regardless of tenure.
- 3.2. This policy defines what a 'reasonable adjustment' is, in what type of circumstances we'll make them, and how customers 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.
- 3.3. The policy sets out our general approach; however, we will consider decisions on a case-by-case basis and make exceptions where it appropriate and reasonable to do so.
- 3.4. Customers and colleagues should feel comfortable asking us to do things differently where this meets a particular need.

### **4. Regulatory and legal requirements:**

#### 4.1. The Equality Act 2010

- 4.1.1. The Equality Act 2010 provides a legislative framework that protects the rights of individuals and makes sure that there are equal opportunities for all. We have a legal duty to make reasonable adjustments when:
  - There is a provision, criterion or practice which puts a disabled person at a substantial disadvantage and not a person who is not disabled.
  - Where a physical feature puts a disabled person at a substantial disadvantage compared to someone who does not have a disability.
  - Where a person would, if not for an auxiliary aid, be put at a substantial disadvantage in comparison to someone who is not disabled.

#### 4.2. Regulatory Requirements

- 4.2.1. The Regulator of Social Housing (RSH) sets out in the Consumer Standards the requirements in relation to vulnerability.

- 4.2.2. These are:

Registered providers must *treat tenants and prospective tenants with fairness and respect.*

Registered providers must *take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants.*

- 4.2.3. There is an additional expectation from the RSH that the Registered Provider's vulnerability policy takes into account their customer profile. Onward Homes Limited owns around 30,000 social and affordable homes and it delivers the majority of services to customers. Onward also has a higher proportion of supported housing stock than most of our peers. 19.5% of our stock is either supported housing or housing for older people, compared to our benchmark median of 7.5%. Due to the more vulnerable nature of these customers Onward provide additional services such as lifeline facilities and wrap around care to ensure they feel safe and supported in their own homes.
- 4.2.4. As an example, in 2024, we tested a new way to deliver welfare calls to customers in our sheltered schemes to ensure we gave our vulnerable customers the choice of when to receive their call and how to send alerts to their scheme manager. Onward commit to rolling this technology out further to meet the needs of more vulnerable customers within our supported and general needs homes.
- 4.2.5. In response to customer feedback, we launched 'Operative on the Way' to make it easier for our most vulnerable customers to contact Onward about their repair's appointments. Customer can now get an alert via a text message on the day of their appointment which allows them to track their tradesperson in real time and allows them to send a message if plans change or the customer feels unable to continue with the appointment for whatever reason.

### 4.3. The Housing Ombudsman's Requirements

- 4.3.1. The Housing Ombudsman report 'Relationship of Equals' emphasises the importance of treating tenants with equal respect, dignity, and compassion. The Housing Ombudsman Service (HOS) recommends that *"particular attention should be given to vulnerable individuals, ensuring they receive the understanding and support necessary to maintain a safe living environment."*
- 4.3.2. Onward has adopted this approach that focuses on positive relationships, good communication, reasonable adjustments, and accessibility to complaints.
- 4.3.3. The HOS sets out in the Complaint Handling Code that:  
*Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.*
- 4.3.4. The HOS goes further with calls for Landlords to have a clear and consistent understanding of their responsibilities following their reoccurring lessons from casework and have challenged landlords to be more flexible and agile and to adapt and evolve core services to better meet the needs of vulnerable residents.
- 4.3.5. Onward has therefore proactively improved knowledge about our customers and homes and records keeping on vulnerabilities.

4.3.6. Onward will ensure that this Vulnerability policy is embedded in our practice and is continuously stress testing against the 3Rs – recognise, respond, and record vulnerabilities.

## 5. Recognising vulnerability:

- 5.1. Customers may be vulnerable for all sorts of reasons and there is no legally agreed definition of a vulnerable customer.
- 5.2. Onward has therefore adopted the Housing Ombudsman’s definition of ‘vulnerable’ as:

“Characteristics that a customer possesses, either permanently or temporarily, that may mean they need care or support to complete landlord-tenant transactions – e.g., paying their rent, opening the door to allow a gas safety check.”
- 5.3. In relation to complaints, the HOS define vulnerability as “a dynamic state influenced by individual circumstances, characteristics, and the specific housing complaint. This acknowledges that vulnerability can change over time and is not solely defined by a person’s disability or condition.
- 5.4. Onward can only consider such characteristics if they are:
  - **Disclosed** by the tenant or a supporting party.
  - **Reasonably discoverable** through Onward’s own investigations, provided these do not breach data protection laws or involve intrusive or unreasonable methods.
- 5.5. Onward acknowledge and appreciate that some vulnerabilities may be short-term and include areas like grief and financial distress.
- 5.6. Vulnerability is often linked to ‘protected characteristics’ (Equality Act 2010). The protected characteristics are:
  - Age
  - Disability
  - Gender re-assignment
  - Marriage & civil partnership
  - Pregnancy and maternity
  - Race
  - Religion or belief
  - Sex
  - Sexual orientation
- 5.7. Many of us will be vulnerable at times, e.g., during illness or bereavement, when suffering mental health issues, domestic violence, or money worries. Recognising when customers are vulnerable gives Onward the best chance to help and support them.

## 6. Application:

- 6.1. It is important to develop our knowledge and information to ensure that we can develop our services to customers. We will use the data held to continually adapt and evolve our communication and landlord services to better meet our customers' needs and ensure that they have fair access to, and equitable outcomes of, housing and landlord services.
- 6.2. We use equality impact assessments (EIA) and/or risk assessments to assist us to ensure that our policies, processes, and practices are fair, and do not present barriers to engagement or disadvantage any protected groups. We will ensure that we complete EIA's or risk assessments before taking any significant action including legal action.
- 6.3. **We will:**
  - 6.3.1. Use information and observation to understand if a customer is vulnerable
  - 6.3.2. Record vulnerabilities on customer records and keep this up to date
  - 6.3.3. Investigate gaps in vulnerable customers accessing services, e.g. are disabled customers accessing repairs services as frequently as nondisabled customers?
  - 6.3.4. Allow customers and prospective customers to be supported by a representative or advocate in interactions about landlord services
  - 6.3.5. Record information on other agencies that support vulnerable customers and/or people who have delegated authority or Power of Attorney to act on behalf of customers
  - 6.3.6. Ensure communication with, and information for customers is clear, accessible, relevant, timely, appropriate, and sensitively delivered
  - 6.3.7. Ensure services are accessible and the ways to access these are advertised to customers including supporting how to use online landlord services if required, e.g. Choice Based Lettings bidding service
  - 6.3.8. Expect colleagues to check records for information about customer vulnerabilities at each contact point and adapt their approach as needed
  - 6.3.9. Expect all colleagues and contractors visiting customers at home to ask if there is anything they need to know or can do to help the visit run smoothly
  - 6.3.10. Give customers opportunities to tell us how accessible our services are so we can learn and improve
  - 6.3.11. Make 'reasonable adjustments' to how services are delivered as needed
  - 6.3.12. Train and empower colleagues to request adjustments to help meet customer needs and help customers to access services

#### 6.4. **Customers will inform Onward Homes:**

6.4.1. If they or any relevant member of household becomes disabled and/or vulnerable

6.4.2. If support or flexibility is needed to access services including when booking repairs or home visits.

### 7. **Recording Vulnerability**

7.1. Recording customer vulnerabilities on the Housing Management System gives colleagues the best opportunity to deliver services and support customers in the most appropriate way.

7.2. All colleagues are responsible for recognising vulnerabilities and ensuring that they are recorded on the Housing Management System. Teams have Super users who can advise colleagues and input alerts onto the Housing Management System.

7.3. Several teams will proactively identify and record vulnerabilities on the Housing Management System. **These teams will receive additional training to recognise and record vulnerabilities and include:**

7.3.1. Customer Resolutions Team when working with complainants

7.3.2. Neighbourhood colleagues working on tenancy sign-ups

7.3.3. Neighbourhood and Sheltered and Supported Teams when carrying out Tenancy Reviews, visits, and other contacts

7.3.4. Customer Accounts Team when starting legal action

7.3.5. Safer Neighbourhood Team when starting legal action on Anti-Social Behaviour cases

7.3.6. Tenancy Support when delivering support services

7.4. **Onward Homes will collect data on the following in addition to personal data (age, ethnicity, sex, sexuality):**

7.4.1. Physical, hearing, speech, and visual impairment

7.4.2. Care leaver under twenty-five

7.4.3. Mental illness, e.g., bipolar disorder, depression etc.

7.4.4. Neurodiversity, e.g. autism, ADHD, etc.

7.4.5. Chronic, debilitating health condition, e.g., heart and/or liver condition

7.4.6. Breathing difficulties e.g. bronchitis, COPD, asthma

7.4.7. Neurological conditions that effect independent living, e.g., dementia, Alzheimer's etc.

7.4.8. Recent experience of domestic violence

7.4.9. Support worker in place

7.4.10. Interpreter required

## **8. Reasonable Adjustments**

- 8.1. We will consider how to reasonably adjust services in relation to customers' specific circumstances. Examples of reasonable adjustments that may be made include:
- 8.1.1. Sensitively deciding if vulnerable customer/s should be visited in person rather than using the telephone
  - 8.1.2. Explaining written information in person or over the telephone if customers have visual impairment or literacy issues
  - 8.1.3. Allowing customers more time to answer the door if the customer or a member of the household has a hearing impairment
  - 8.1.4. Using the interpreter and translation service if someone does not speak English as a first language.
  - 8.1.5. Offering to send a same sex colleague and/or visiting in mixed sex pairs if a customer has been the victim of domestic violence.
  - 8.1.6. Offering additional support or flexibility of service to neurodiverse people e.g., prearranged appointments and flexible times for repairs
  - 8.1.7. Asking a support worker from another agency to provide support around difficult issues, e.g., rent arrears.
  - 8.2. In accordance with the Mental Capacity Act 2005, we will liaise with those with legal authority to act on behalf of our customers who lack capacity.
  - 8.3. If colleagues are unsure about any aspect of recognising, recording, or making reasonable adjustments they should discuss with their manager.

## **9. Training**

- 9.1. Onward will ensure that refresher training is provided to all colleagues in relation to EDI, Safeguarding, EIA's, learning from complaints and other relevant courses. Training will help support colleagues to recognise potential signs of vulnerability.

**If you want to speak to us about anything else you can:**

- visit the My Onward Portal ([my.onward.co.uk](https://my.onward.co.uk))
- call **0300 555 0600** or message **07418 344 603** on WhatsApp between 8am-6pm Monday to Friday and 10am-6pm on Wednesdays
- email [customerservices@onward.co.uk](mailto:customerservices@onward.co.uk)

## GLOSSARY.

Procedure	Purpose
<b>Advocate</b>	An advocate helps to express wishes on someone else's behalf.
<b>Choice Based Lettings</b>	Choice Based Lettings is a system to allocate social housing where people bid on properties and applications are then determined by the local authority.
<b>Complaint handling code</b>	The Housing Ombudsman Service set of standards and best practices that all social landlords must follow to guarantee fair, transparent, and effective complaint handling processes. These standards specify requirements for accessibility, impartiality, and learning from complaints.
<b>Consumer standards</b>	The Regulator of Social Housing sets out consumer standards that housing associations must deliver. These cover: <ul style="list-style-type: none"> <li>• Safety and Quality: Homes must be safe and of good quality.</li> <li>• Transparency, Influence, and Accountability: Landlords must be open with tenants and treat them fairly.</li> <li>• Neighbourhood and Community: Landlords must ensure tenants live in safe, well-maintained neighbourhoods.</li> <li>• Tenancy: This covers fair allocation, management, and ending of tenancies.</li> </ul>
<b>Data protection laws</b>	UK law governs how personal data is collected, processed, stored, and shared. For a housing association, this means ensuring customers' personal information, including complaints, is handled securely, lawfully, and transparently, in line with data protection principles. (Note: The main UK data protection laws are the UK GDPR and the Data Protection Act 2018. "Data Protection Act" is often used as a general term).
<b>Equality Act 2010</b>	The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society.
<b>Equality Impact Assessments</b>	An Equality Impact Assessment evaluates how a policy, strategy, or function might affect different groups of people, particularly those with protected characteristics under the Equality Act 2010.
<b>Housing for older people</b>	We provide housing for older people in our sheltered accommodation, which includes self-contained flats in independent living schemes with communal facilities, and extra-care schemes for customers who have additional support needs or vulnerabilities.
<b>Housing Ombudsman</b>	An independent organisation that investigates complaints related to housing services and ensures fair resolutions.

<b>Housing management system</b>	This is the system that housing associations used to manage properties and tenancies and covers areas such as managing rent, tracking repairs, handling tenancy documents, and enabling communication with tenants.
<b>Housing stock</b>	This is another term for the homes we own and manage.
<b>Mental Capacity Act 2005</b>	The Mental Capacity Act 2005 provides a framework for decision making on behalf of adults aged 16 and over who are unable to make decisions for themselves, i.e. they lack capacity.
<b>Protected characteristics</b>	Protected characteristics cover: age; disability; gender re-assignment; marriage & civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
<b>Reasonable adjustments</b>	These are changes we may make to services based on a customers' characteristics or circumstances.
<b>Regulator of Social Housing</b>	The Regulator of Social Housing sets and enforces standards for social housing providers in England to ensure they are well-managed, financially stable, and provide high-quality, safe, and energy-efficient homes and services to residents.
<b>Safeguarding</b>	Safeguarding is making sure that people are safe and can live their lives in the way they want to, free from abuse, harm or neglect.
<b>Supported housing</b>	Supported housing provide short and long-term accommodation for people with ongoing support needs.
<b>Vulnerabilities</b>	<p>Customers may be vulnerable for all sorts of reasons and there is no legally agreed definition of a vulnerable customer. Onward has therefore adopted the Housing Ombudsman's definition of 'vulnerable' as:</p> <p>"Characteristics that a customer possesses, either permanently or temporarily, that may mean they need care or support to complete landlord-tenant transactions – e.g., paying their rent, opening the door to allow a gas safety check."</p>

## GET INVOLVED.

Members of our Customer Engagement Community help to improve the services you receive by sharing their concerns, views and ideas, as well as taking part in activities to improve your neighbourhood and local area. The Community also works with us to shape our policies and helped to make this one easier to understand.

If you are interested in joining our Customer Engagement Community, please visit our website ([onward.co.uk/get-involved](https://onward.co.uk/get-involved)), call **0300 555 0600**, or email [customerengagement@onward.co.uk](mailto:customerengagement@onward.co.uk).

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