

# Policy

<b>Title:</b>	Additional Support and Reasonable Adjustments Policy
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## 1. Introduction

- 1.1 At Halton Housing we are committed to meeting the needs of all customers, to ensure that they are treated fairly and with respect, have equal opportunity and receive equal outcomes in relation to the homes and services that we provide.
- 1.2 The purpose of the policy is to outline how we can identify customers that may need additional support, how we can adjust our approach or services to meet the diverse needs of all customers and how we comply with all relevant legal duties and regulatory requirements.

## 2. Policy Statement

- 2.1 As a responsible social landlord, our overall objective is to ensure that our customers receive the appropriate level of support to be able to manage and sustain their tenancy, access the appropriate landlord services and to engage with us as a landlord.
- 2.2 To achieve this, we aim to:
  - have robust and accurate customer data, which records any disability and or additional support needs
  - use all available information to understand customer support needs
  - take account of additional support needs in our communication, decision making and design and delivery of key services
  - assist customers to access the additional support or reasonable adjustments that they may need
  - record any known representatives who act as a 'delegated authority' or with power of attorney to act on the customer's behalf
  - consider any additional support needs and where appropriate adjust our service delivery to ensure all customers receive equal access and outcomes
  - make appropriate referrals to our tenancy support team to provide enhanced support where appropriate
  - refer to other agencies and other external partners for appropriate support and make safeguarding referrals whenever needed

### **Defining additional support or reasonable adjustment needs**

- 2.3 We will identify that customers may have additional support, or reasonable adjustment needs if they have a particular characteristic and/or experience an exceptional life event and that means they are either unable to act independently or need some additional support to access our services or manage their tenancy.

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2.4 Requiring additional support can be a changeable state, influenced by multiple factors and experiences. Common conditions or characteristics or events that may indicate additional support or reasonable adjustments are needed include, but are not limited to:

- Disability
- Chronic illness
- Age
- Unemployment
- Financial distress
- Bereavement
- Language barriers
- Communication and language needs
- Neurological needs

2.5 Halton Housing's objective in developing this policy is to recognise, adjust and respond, supporting the 'whole person' using a person-centred model.

#### **Indicators that additional support or reasonable adjustments may be required**

2.6 Customers may not always disclose that they require additional support, however there are things that could indicate that a customer may need additional support.

- Customers who are falling into rent arrears
- Customers who have issues maintaining their tenancy or licence
- Customers who are the victim or perpetrator of anti-social behaviour, hate crime or harassment
- Customers who have disputes with neighbours
- Customers whose property or garden condition is deteriorating
- Customers who experience a detrimental change to their physical appearance
- Customers who fail to respond to correspondence or to answer the door when visited
- Customers who are experiencing self-neglect, hoarding or other behaviour which results in the person's home becoming damaged, neglected or otherwise unfit for occupation
- A sudden change in customer demand or access e.g. no longer reporting repairs or frequent no access visits

#### **Identifying and recording additional support or reasonable adjustment requirements**

2.7 A customer may be identified as requiring additional support at various points during their tenancy, such as:

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- During pre-tenancy interviews
  - During care and/ or support planning sessions.

2.8 By any colleagues who have contact with the customer, for example:

- Customer Support Hub
- Neighbourhoods Team
- Repairs and Maintenance Team or external contractors during home visits
- From reports from relatives or caregivers; or
- From a referral from an external agency or organisation

2.9 At whichever stage a customer is identified as requiring (or potentially requiring) additional support or reasonable adjustments, this will be recorded in our Customer Relationship Management System.

2.10 If there are any safeguarding concerns, for example ongoing domestic abuse, this will be raised in accordance with either the Safeguarding Adults Policy or Safeguarding Children Policy and reported to the Head of Neighbourhoods.

2.11 Customers are asked about any communication needs when they attend the pre-tenancy interview and at other opportunities during their tenancy.

### **Reasonable Adjustments**

2.12 A reasonable adjustment involves making a change to the way we usually do things to take account of customers' individual needs.

2.13 This may be a physical alteration to a home, a change to the way in which we communicate with customers, manage tenancies and/or deliver services. There is no set list of options as each reasonable adjustment is suited to meet individual needs. For each request, we will speak to customers to discuss what is reasonable in their circumstances.

2.14 Some examples of reasonable adjustments we can make, include but are not limited to:

- Adaptations to a customer's home, such as grab bars, handrails, lever taps etc.
- Provision of information in appropriate alternative formats (e.g. large print, Braille)
- Provision of language interpreter including British Sign Language
- Use of specific communication channels e.g. email rather than telephone or vice versa
- A change to a policy or procedure e.g. extension of time limits where it is appropriate to do so

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- Allowing more time for the customer to get to the telephone or door
  - Considering our repairs offer and prioritising customers with health or support needs

### 3. Regulatory and/or Legal Compliance

- 3.1 This policy is in line with the Equality Act 2010. The Equality Act 2010 relates to the protected characteristics of our customers; however, this policy goes beyond recognising these characteristics and in addition recognises that customers can be vulnerable for reasons beyond those include in the legislation.
- 3.2 Mental Capacity Act (2005) - Some customers may lack the capacity to make their own decisions in line with the Mental Capacity Act 2005 and therefore we will liaise with those who have the legal authority to act on the customer's behalf.
- 3.3 This may be;
- A Legal Power of Attorney
  - Someone with a Deputyship order from the Court of Protection
  - A Litigation friend appointed in Court proceedings
  - An appointee appointed by the Department for Work and Pensions
  - An independent Mental Capacity Advocate
- 3.4 The Regulator of Social Housing's (RSH) Transparency, Information and Accountability standard which expects registered providers (RPs) to
- Treat all tenants with fairness and respect
  - Take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants in relation to the housing and landlord services they provide. Use relevant information and data to a) understand the diverse needs of tenants including those arising from protected characteristics, language barriers and additional support needs, and b) assess whether their housing and landlord services deliver fair and equitable outcomes for tenants
  - Ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants
  - Ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required
  - Allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services
  - Consult customers on any amendments to this policy
- 3.5 Other legislative references include -

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- Human Rights at Home (guidance for social housing providers)
  - Care Act 2014
  - Safeguarding Vulnerable Groups Act 2006

## 4. Diversity Considerations

- 4.1 A Stage 1 Equality Impact Assessment has been completed. This confirmed that a Stage 2 EIA is not required.

## 5. Links to Strategies, Policies and Associated Documents

- Policy links to our Corporate Plan theme, Customer

- 5.1 List of procedures or other documents that are associated with this policy:

- Aids and Adaptations Policy
- Domestic Abuse Policy
- Safeguarding Policy for Adults
- Safeguarding Policy for Children
- Unacceptable Behaviour Policy
- Lettings Policy
- Violence and Aggression at Work Procedure
- Customer Engagement Policy
- Talk to Us Policy



Translations are available on request, by calling 0303 333 0101.

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