London Borough of Brent

Vulnerable Residents and Reasonable Adjustments Policy

This policy sets out the Council's approach to ensuring that residents with vulnerabilities receive fair, equitable, and accessible housing services.		
Owner:	**Spencer Randolph, Director Housing Services**	
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Brent

Regulator:	**Equality Act 2010** **Housing Ombudsman's Complaint Handling Code.** **Housing Ombudsman Spotlight Reports relating to vulnerability and communication.** **Care Act 2014** **Human Rights Act 1998** **Homelessness Reduction Act 2017** **Heat Network (Market Framework) Regulations and associated consumer protection requirements, including responsibilities toward vulnerable heat network customers.**
Legislation:	**The Building Safety Act 2022** **Fire Safety Act 2023**
Codes of Practice:	**The Regulator's Consumer Standards Code of Practice**
The policy also operates in the context of:	**Policies across Housing Services**

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1. Introduction

This policy sets out the Council's approach to ensuring that residents with vulnerabilities receive fair, equitable, and accessible housing services. Our commitment is rooted in recognising that vulnerability can affect how individuals

engage with housing processes, understand information, report repairs, and sustain their accommodation.

We acknowledge that many residents face complex and intersecting challenges: disability, long-term health conditions, mental ill-health, trauma, language and literacy barriers, digital exclusion, domestic abuse, financial hardship, or the instability associated with temporary accommodation. These factors can significantly impact their ability to interact with our services in ways that standard procedures may not fully support. In line with best practice across the sector, our approach emphasises a culture of empathy, accessibility, and fairness. We are committed to embedding these principles into service delivery, staff training, systems design, and organisational culture, ensuring that vulnerabilities are identified early, recorded accurately, and responded to proportionately.

2. Aims and Objectives

The aims of this policy are to ensure that every resident who engages with our housing services is treated fairly and experiences equitable outcomes, regardless of any personal circumstances that may make accessing our services more difficult.

We recognise that vulnerability can present in many forms, and influence how individuals understand information, communicate with us, or how much support they need to live in their home. For this reason, we are committed to embedding an awareness of vulnerabilities across all aspects of our service design, policy development and day-to-day interactions.

A central aim of this policy is to ensure that residents who require additional support receive timely and appropriate reasonable adjustments. This includes making sure that our processes are sufficiently flexible to accommodate individual needs and that these adjustments are consistently applied across the council's housing functions. By doing so, we seek not only to comply with statutory duties but to actively promote an environment where residents feel understood and supported.

We also recognise that our ability to deliver equitable services depends on staff having the confidence, skills and knowledge to identify vulnerability and respond proportionately. This policy therefore commits us to ensuring that staff are trained, equipped and empowered to recognise when additional support or a modified approach may be needed. We will work to reduce barriers to communication, particularly for residents facing language challenges, low literacy, or digital exclusion, and we will ensure that information is provided in ways that are accessible and meaningful.

We acknowledge that residents living in temporary accommodation may face heightened vulnerability because of instability, uncertainty and limited control over

their circumstances. As part of this policy, we will take additional steps to understand and respond to their needs, ensuring that their access to services is not compromised by the pressures associated with temporary housing arrangements.

Underlying these aims is a commitment to early intervention and collaborative problem-solving. Where vulnerability is identified at an early stage, we can prevent issues from escalating into crisis situations or enforcement action, and instead work with residents to achieve more positive, sustainable outcomes. This intention reflects our broader commitment to openness, transparency and adaptability, ensuring that all residents, regardless of their background or circumstances, can engage confidently and effectively with our housing services.

3. Scope

This policy applies to all housing services delivered by the local authority and is intended to provide a consistent framework for recognising and responding to vulnerability across the full range of our housing functions. It covers every point at which a resident may interact with us, establishing a consistent offer for residents who are less able to access services. All services play a vital role in supporting residents to maintain safe, secure and sustainable homes, and it is essential that staff across all teams are equipped to identify where vulnerability may affect a person's ability to engage with our processes or access the support they need.

By ensuring a shared understanding of vulnerability across all housing functions, we aim to promote a coordinated and consistent approach that enables residents to navigate our services confidently, regardless of their individual circumstances. Whilst we recognise that the focus of this policy is on the council's housing services, as a local authority we have cross cutting services that provide support to residents experiencing difficulty, instability or crisis. It is therefore important that the principles of this policy are embedded through those services as well.

For residents receiving heating and hot water through council-owned or council-managed communal and district heat networks, the principles in this policy will apply to ensure that vulnerable residents are identified, supported and protected. This includes arrangements relating to heat supply interruptions, planned maintenance, billing, metering, complaints and debt recovery.

4. Assessing and Defining Vulnerability

Defining Vulnerability

The Housing Ombudsman defines vulnerability as: *"A dynamic state which arises from a combination of a resident's personal circumstances, characteristics and their*

housing complaint. Vulnerability may be exacerbated when a social landlord or the Housing Ombudsman Service does not act with appropriate levels of care when dealing with a resident's complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced."

We understand that 'vulnerability' can be a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic abuse, physical disabilities and other circumstances. Examples of characteristics and common causes of vulnerability we take into consideration are included at Appendix A. Some of these circumstances are permanent or long term in a person's life, whereas other factors can include negative life events or time limited physical and mental health conditions. The interaction of these factors will determine how vulnerable a person is at any point in time and how much additional assistance or adjustments they may require to sustain their tenancy or lease and manage day to day activities.

Assessing Vulnerability

The Council assesses an applicant's level of vulnerability when they apply for assistance. This applies whether the application is made under homelessness legislation or through a request to join the Council's Housing Register for social housing.

Applicants who present with significant or complex vulnerabilities are referred to specialist services, including Mental Health Services and Adult Social Care. For people with low to medium support needs, the Council provides a range of supported accommodation. This accommodation is intended to offer structured, time-limited support.

Residents are usually expected to stay in supported accommodation for a period of 18 to 24 months. During this time, they receive support that helps them develop the skills and stability needed to move on to independent living. This may be in the private rented sector or in social housing.

However, the supported housing pathway is currently under pressure because of a shortage of suitable and affordable move-on accommodation. As a result, many supported schemes are experiencing reduced turnover, which limits their capacity to take new referrals.

Identifying Vulnerability

Recognising vulnerability requires sensitivity, active listening, and an understanding that individuals may not always feel comfortable disclosing their circumstances.

We identify vulnerability through:

- Resident disclosure.

- Staff observations including home visits (e.g., missed appointments, confusion, distress).
- Information shared by partner agencies (with consent).
- Issues that arise in temporary accommodation.

Assessment and Recording

- Staff approach conversations sensitively and explain why information is being asked for.
- Only relevant information is recorded.
- Information is stored securely and shared only where necessary.

Decision-Making

- Requests for adjustments are assessed promptly.
- Residents receive clear explanations when deciding on reasonable adjustments and whether they are provided or not.
- Where adjustments cannot be made, alternatives approaches and measures are explored.

Ongoing Review

- Adjustments are revisited regularly, especially during major case milestones.

Heat Network Vulnerable Customers

For the purposes of communal and district heat networks operated or managed by the Council, a vulnerable customer is any resident whose personal circumstances, health, financial situation, or dependency on heat and hot water places them at increased risk of harm, detriment, or inability to manage their heat supply compared to other customers.

This includes, in particular:

- Residents with health conditions or disabilities that are adversely affected by loss of space heating or hot water
- Older people and households with young children
- Residents dependent on heat or hot water for medical or care needs
- Those in financial difficulty, fuel poverty, or at risk of self-disconnection from a heat network
- Residents with communication, language, cognitive or accessibility needs
- Anyone experiencing temporary vulnerability (for example due to illness, bereavement, hospital discharge, or crisis).

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5. Service Provision – considering vulnerabilities

Each service area will consider what additional support or reasonable adjustment is appropriate for vulnerable residents. Where reasonable adjustments are needed, these will be recorded within the resident's customer record. Additional support and reasonable adjustments will vary from service to service, but all services will:

- Contact resident in the way they have selected
- Offer translation services or similar
- Allow formally nominated advocate to act on behalf
- Consider mobility, visual or hearing impairments
- Consider neurodiversity
- Consider personal circumstances e.g. pregnancy, sickness, distress

The below displays examples of reasonable adjustments for specific services:

Parking

Ensuring that adjustments are made for parking arrangements to ensure that even if a resident is in arrears, they still have the provision of disabled parking allocated to them.

Allocations

Considerations and adjustments are built into the allocations process by the way that people are assessed on the housing waiting register, in line with the council's Allocations Scheme.

Damp and Mould

We recognise that certain children and adults are likely to be more severely impacted by exposure to damp and mould. Primarily this includes babies and young children, the elderly, pregnancy and/or some disabilities, including those with respiratory illnesses. Whilst all cases are dealt with in line with Awaab's Law requirements, we specifically prioritise damp and mould remediation in cases where vulnerabilities could result in a heightened susceptibility to illness as a result of exposure.

Our Damp and Mould Policy outlines the approach to triaging and prioritising reported cases of damp and mould.

Heat Networks (including Communal Heating and Hot Water)

We recognise that disruption to heating or hot water can have a disproportionate impact on vulnerable residents, particularly those with health conditions, older people, households with young children, and those dependent on a continuous heat supply.

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Where residents receive heating and hot water through a communal or district heat network, vulnerability will be taken into account when prioritising response, communication and resolution. In line with heat network regulatory requirements, incidents affecting vulnerable residents will be prioritised where loss of service may result in increased risk to health, safety or wellbeing.

Complaints and Compensation

Complaint response can be issued either by email or post depending on preference, with written information provided in accessible formats on request, and staff trained to use clear, plain and trauma-informed communication.

Service Design

New services and processes are assessed for their impact on residents with additional needs.

6. Reasonable Adjustments

Reasonable adjustments play a central role in ensuring that residents are not unfairly disadvantaged when engaging with our housing services. We recognise that some individuals may face barriers that affect their ability to communicate, understand written information, attend appointments, or follow standard processes. In these situations, it is essential that we adapt our approach so that residents can access support in a way that is fair, inclusive and responsive to their needs. Reasonable adjustments enable us to do this by modifying how we communicate, how we deliver our services, or how we structure our interactions with residents.

For some residents, communication support is the most important adjustment we can make. This may involve providing interpreting or translation services for those whose first language is not English, or offering written information in plain English, accessible formats, or alternative mediums where literacy, language or sensory needs make standard communication difficult. We may also work with advocates, support workers or family members, where appropriate and with consent, to ensure that a resident can express themselves and fully understand the information they are given. In cases where a resident struggles to engage through standard channels, additional contact attempts or alternative methods of communication may be required to ensure they are not inadvertently excluded.

Other adjustments relate to the council's processes. Where a resident's circumstances mean that rigid adherence to standard procedures would place them at a disadvantage, we may adapt the process accordingly. This could include offering more flexible appointment times, allowing longer or alternative visit arrangements, or adjusting arrears or enforcement pathways where vulnerability is a contributing factor. In some cases, the repairs service may need to prioritise works that have a

direct impact on a resident's health, safety or wellbeing, or modify how appointments are scheduled and communicated. These adjustments ensure that our processes remain fair and proportionate, while still maintaining the integrity of our statutory and operational responsibilities.

In some situations, more practical adjustments are needed to ensure that a resident can access the support they require. These aspects of service delivery will be embedded within processes and procedures across Housing Management, repairs and external support services, ensuring that support is delivered in a coordinated and sensitive manner.

All reasonable adjustments must be proportionate, clearly recorded to ensure they remain appropriate as circumstances change. Our responsibility is not only to identify where adjustments may be needed, but to ensure that they are consistently applied and that residents are informed about what support is available. By embedding this approach across all housing services, we seek to create an environment where residents feel understood, supported, and able to engage confidently with us, regardless of the challenges they may face.

In most cases, we will be able to agree and deliver the required reasonable adjustment with as little delay as possible. In some cases, we may need to consider in more detail how best to overcome the difficulty a vulnerable person is experiencing.

We will consider a range of factors when deciding what reasonable adjustments to make, including:

- Effectiveness - how effective an adjustment might be to prevent the disadvantage. Wherever possible the adjustment should fully address the disadvantage it is meant to overcome.
- Practicality - whether it's possible to make the adjustment in an easy way.
- Resources - whether the resources required to carry out the adjustment are proportionate to the impact. For example, employing a specialist officer to provide support may be appropriate if there are several people who require the specialist support, but it may be more appropriate to buy in a specialist when needed if the skills are rarely required.

The approach to Reasonable Adjustments is also underpinned by the Equality Act 2010, specifically Section 20 regarding Reasonable Adjustments.[1]

[1] Equality Act 2010, Section 20 https://www.legislation.gov.uk/ukpga/2010/15/section/20

7. Wider Support Offered and signposting to other services

While this policy focuses on housing functions, wider support may be offered through:

- GPs and other medical professionals
- Mental Health Services
- Adult Social Care Services
- Family Wellbeing Centres
- Brent Hubs

These services complement, but do not replace, tailored adjustments within housing services.

Safeguarding vulnerable people

Safeguarding is about protecting a person's right to live free from abuse and neglect. It means working to prevent harm and responding when someone is at risk. Safeguarding is everyone's responsibility; however safeguarding duties do not replace or delay housing action.

Housing staff have a duty to consider adult safeguarding where there is reasonable cause to suspect abuse, neglect, or risk of abuse or neglect (including self-neglect) in line with the Care Act 2014. Adult safeguarding is about protecting an adult's right to live free from abuse and neglect, while supporting choice and control wherever possible.

Housing staff and contractors delivering services on behalf of Brent Council should refer to this Policy for guidance if they have any concerns.

If a safeguarding concern is identified by a member of staff, they must follow the Council's adult safeguarding procedure to make a referral to Adult Social Care or Children's services.

8. Application Across Housing Services

The principles set out in this policy apply across all housing services, ensuring that every resident receives a consistent, fair and responsive approach regardless of how or where they engage with the council. Vulnerability can affect any aspect of a person's housing experience, and each service area has a crucial role to play in recognising when additional support may be required and in adapting processes to prevent residents from being disadvantaged.

Lettings and Allocations

Staff play a key role in identifying vulnerability early, often at the first point of contact. This may involve adjusting viewing arrangements, providing additional time to explain key tenancy obligations, or offering tailored sign-up appointments that take account of the resident's communication needs, support requirements or personal circumstances. Ensuring that the right support is in place before a tenancy begins helps residents to settle successfully and reduces the risk of tenancy failure.

Income and Arrears

It is essential that staff adopt a supportive and proportionate approach. Financial vulnerability can make it difficult for residents to manage rent payments or respond to standard arrears processes. Staff are expected to explore the underlying causes of non-payment, recognise when a resident may be in financial hardship, and adapt their approach accordingly. This may mean allowing additional time, agreeing more flexible repayment arrangements, or avoiding escalation to enforcement action where vulnerability is clearly impacting the resident's ability to engage, and where early intervention may prevent further escalation.

Where residents receive heating and hot water through a communal or district heat network, staff will consider vulnerability when applying billing, payment recovery or enforcement processes. Loss of heat supply as a result of debt action must be avoided where this would place a vulnerable resident at risk. Early engagement, flexible repayment options and signposting to support, such as Brent's Well & Warm Programme and Resident Support Fund (RSF), will be prioritised.

Repairs and Maintenance

Timely communication and flexibility are especially important. When a resident has a health condition, mobility difficulty, sensory impairment or other vulnerability, repairs can have a significant impact on their wellbeing. Staff should consider prioritising works that affect safety or health, offer flexible appointment times, and ensure residents receive clear and accessible communication about upcoming visits. Where necessary, coordination with other services or support networks may be required to ensure access and reduce stress for the resident, ensuring reasonable adjustments are made to accommodate the resident's needs.

Antisocial Behaviour (ASB)

This approach must recognise that vulnerability may be present in both those reporting ASB and those alleged to be causing it. Staff should adopt a trauma-informed approach, ensuring that communication is sensitive and that the resident's circumstances are fully understood before deciding on next steps. Multi-agency involvement may be necessary where risks are complex or where specialist support is needed. Taking time to understand the context of behaviour can

prevent escalation and ensure that responses are fair, proportionate and rooted in safeguarding principles.

Temporary Accommodation

Residents living in temporary accommodation often experience additional vulnerability linked to instability, uncertainty and limited support networks. Staff must be attentive to the pressures associated with temporary living arrangements and adapt their approach to provide additional reassurance, more frequent communication, and appropriate signposting to support services. Collaboration with welfare, health and community partners is often essential to maintaining stability and preventing further crisis.

Tenancy Management

Officers play a vital role in recognising risk early. This may involve carrying out welfare checks where concerns arise, responding quickly to indications that a resident is struggling, and escalating cases to safeguarding or specialist teams when needed. Tenancy officers should adopt a proactive and practical approach, offering support and advice tailored to the resident's circumstances and ensuring that interventions are coordinated with other internal or external services.

Across all these service areas, the expectations remain the same: that staff take time to understand individual needs, adapt processes to ensure fairness, and work collaboratively to support residents to maintain their homes and access the services they need. This coordinated approach is essential to delivering housing services that are genuinely responsive, equitable and inclusive.

Heat Supply Interruptions

Where there is an actual or anticipated interruption to heating or hot water on a communal or district heat network, vulnerability information will be used to inform:

- prioritisation of response and restoration activities
- communication frequency and method
- escalation thresholds

Additional care will be taken where residents are clinically vulnerable, older, or with young children, or otherwise reliant on continuous heat supply. The Council will take reasonable and proportionate steps to reduce risk and hardship during outages.

9. Legal and Ombudsman Framework

The Council has a duty under the Equality Act 2010 to "advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it" (see Section 8 on Protected Characteristics). However,

as a social landlord we recognise that many more tenants can be vulnerable for reasons other than the characteristics protected under equalities legislation. This policy sets out how we define vulnerability and how we aim to respond to those residents' needs.

The Regulator of Social Housing has issued consumer standards against which landlords will be inspected. The transparency, influence and accountability standard require landlords to be open with tenants and treat them with fairness and respect. The Tenant Involvement and Empowerment Standard require local authority landlords 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 and tenants with additional support needs". There is a specific expectation that landlords will "demonstrate how they respond to those needs in the way they provide services and communicate with tenants". The Regulator's Consumer Standards Code of Practice also provides that registered providers should be able to demonstrate how they have taken into account the needs of vulnerable households in their approach to tenancy management.

The Housing Ombudsman Complaints Handling Code 2024 states 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." and also "Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk."

The Building Safety Act 2022 and Fire Safety Act 2023, plus secondary and tertiary legislative changes to the Regulatory Reform Order (Fire Safety) 2021, requires the council to identify and risk assess existing measures to protect the resident if fire occurs. The Fire Risk Assessment must consider the capacity of the resident to respond appropriately to fire alarm signals or signs of fire. Evacuation plans must consider the ability of the resident to make their way to safety, and the council must determine the level of risk to the resident from fire and emergency services response times if a "stay put" policy is in force.

Our duties and approach to vulnerability are informed by:

- Equality Act 2010 – requiring reasonable adjustments and non-discriminatory practice.
- Housing Ombudsman's Complaint Handling Code.
- Housing Ombudsman Spotlight Reports relating to vulnerability and communication.
- Care Act 2014 – particularly where vulnerability overlaps with social care needs.
- Human Rights Act 1998 – ensuring dignity, fairness, and respect.
- Homelessness Reduction Act 2017 – duties toward those threatened with homelessness.

- Heat Network (Market Framework) Regulations and associated consumer protection requirements, including responsibilities toward vulnerable heat network customers.

The Ombudsman emphasises:

- Clear record-keeping of vulnerabilities.
- Tailored communication and accessibility.
- Avoiding rigid procedural adherence where this disadvantages residents.
- Clear explanations when adjustments are refused and what alternatives have been offered.
- Evidence of learning from complaints involving vulnerable residents.

Mental Capacity

In line with the Mental Capacity Act 2005, we will always assume capacity, but in circumstances where this is in doubt we will ensure that we liaise with appropriate services to ensure that the needs of the resident are met, we will always liaise with those who have legal authority to act on behalf of our residents who lack capacity. That may be a representative who has or is a:

- Lasting Power of Attorney (LPA)
- Deputyship Order from the Court of Protection
- Litigation friend appointed in Court proceedings if the resident lacks capacity to litigate

10. Compliance, Monitoring and Review

Compliance with this policy will be monitored through regular reviews. This will include case audits by the relevant manager and service audits to ensure all our residents are able to access our services and receive equitable outcomes.

Right of Appeal

- If a resident is not satisfied with the service they have received, they can access the council's complaints procedure. It is of utmost importance that Officers responding to complaints from residents with vulnerabilities properly consider these vulnerabilities in their response.

Success measures

- Residents feel that they are treated fairly and with respect when interacting with the council.
- Improved staff confidence in handling vulnerabilities

Support and training for Staff

- Vulnerability-aware practice is embedded across all housing-related policies, procedures, and reviews.

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- Staff awareness of the key drivers of vulnerability (set out in Appendix A)

Appendix A – Common causes of Vulnerability

Vulnerability refers to any personal circumstance or characteristic that may affect a resident's ability to communicate, access, understand, or engage with housing services. It is not limited to disability and can arise from a broad range of factors. Vulnerability may be:

- Permanent – such as long-term disabilities or degenerative conditions.
- Long-term but fluctuating – such as periods of mental ill-health.
- Temporary – such as bereavement, injury, or acute illness.
- Situational – such as domestic abuse, trauma, or a sudden life event.
- Hidden – not immediately apparent or disclosed.
- Linked to accommodation status – such as the instability of temporary accommodation.

Common causes of Vulnerability

The common causes of vulnerability are broad categories used to identify the underlying factors that may give rise to additional or different needs for residents. They help explain why someone may require support by capturing key aspects of their health, circumstances, resilience, safety, or capability.

The list below gives examples of the circumstances and characteristics under these five definitions which can lead to residents having additional or different needs. The characteristics listed below serve as examples, rather than an exhaustive or definitive list.

Definitions

- Health: Health condition or illness that affects ability to carry out day-to-day tasks
- Life events: Circumstances that may negatively affect a person's life
- Resilience: Low ability to withstand financial or emotional shock
- Safety: When a person is in a situation that compromises their personal safety
- Capability: Low knowledge or confidence in managing day-to-day affairs

Examples of common causes of vulnerability

Health:

- Sensory impairments
- Chronic health conditions
- Mental ill-health

- Physical disabilities

Life Event:

- Homelessness risk or temporary accommodation
- Bereavement or trauma
- Living with or caring for someone (including young carers)

Resilience

- Social isolation or support networks
- Severe financial hardship
- Digital exclusion

Safety:

- Domestic abuse or coercive control
- Discrimination and racism

Capability

- English not being a first language
- Literacy barriers

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