

Vulnerability, Inclusive Services and Reasonable Adjustments Policy

This policy sets out Bromford Flagship LiveWest’s approach to recognising, recording, and responding to customer vulnerability, providing inclusive services, and making reasonable adjustments, in support of delivering safe, fair, and responsive services to our customers. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

Department	Customer Experience
Policy owner	Regional Director - Customer Director of Service Delivery
Approved date	December 2025
Date for review	July 2028
Approving body	Customer SLT
Associated legislation/regulation	Care Act 2014 Consumer Standards 2024 (Transparency, Influence & Accountability Standard, Tenancy Standard) Housing Act 2010 Localism Act 2011 Data Protection Act 2018 / UK GDPR Housing Ombudsman Complaints Handling Code Human Rights Act 1998 Mental Capacity Act 2005 Equality Act 2010 (including Public Sector Equality Duty, s.149) Mental Health Act 1983 [Added] Data Protection Act 2018 / UK GDPR (explicit reference to lawful basis for recording vulnerabilities) [Reworded] Public Sector Equality Duty (s.149 EA 2010)
Legal advice from	Internal Legal Review
Equality impact assessment date	October 2025
Version number	1.0
Publication status	Internal Intranet and Customer Website

This policy applies to customers of:

Bromford.



Purpose/principles

This policy sets out our commitment to ensuring that every customer, including those experiencing vulnerability or with protected characteristics, can access services that are fair, inclusive, and supportive of their wellbeing and ability to sustain their tenancy.

We recognise that vulnerability can affect anyone at any time and may be temporary or permanent. We will treat all customers with dignity, compassion, and respect, and we will not expect people to repeat their story unnecessarily.

This policy supports the Regulator of Social Housing's 2024 Consumer Standards, particularly the Transparency, Influence and Accountability Standard, and aligns with the Housing Ombudsman's principles of fairness, including accessibility, putting things right, and learning from outcomes. It also links closely to our Equality, Safeguarding, Domestic Abuse, and Reasonable Adjustments policies.

This policy supports statutory duties under the Equality Act 2010, Care Act 2014, and Mental Capacity Act 2005, ensuring that our approach to recognising and recording vulnerability is fair, lawful, and proportionate. Any information about vulnerability will only be recorded or shared where there is a lawful basis under the Data Protection Act 2018 / UK GDPR, such as consent, vital interests, or public task.

Scope

This policy applies to:

- Bromford Flagship LiveWest colleagues, contractors, and third parties delivering services on our behalf¹
- customers, including applicants, homeowners, household members, and visitors

It covers all customer-facing services including lettings, tenancy management, arrears, repairs, complaints, customer contact, safeguarding, enforcement, and supported housing.

This applies to the whole customer journey, from applying for a home, through day-to-day services, to times when extra support is needed.

Roles/responsibilities

Board / Committees provide oversight and assurance that the policy aligns with strategic priorities, customer outcomes, and regulatory requirements.

Executive Leadership Team / Directors are accountable for ensuring the policy is implemented consistently across their areas of responsibility and that compliance is maintained.

¹ Colleagues and contractors of Bromford and Flagship or their subsidiaries, plus any former Bromford and Flagship colleagues now operating under Bromford Flagship LiveWest. At the time of writing LiveWest operate under a separate policy.

Heads of Service / Service Leads are responsible for embedding the policy within their service areas, ensuring colleagues are aware of and follow the requirements, and providing assurance on compliance.

Customer-facing colleagues are responsible for applying the policy in day-to-day service delivery, supporting customers, and taking action or escalating issues in line with procedures.

All colleagues are expected to understand the policy as it relates to their role, complete any required training, and seek support where clarification is needed.

Policy content

Definitions

Vulnerability

A temporary or ongoing condition, experience, or set of circumstances that reduces a customer's ability to cope, act independently, or manage their tenancy without additional support. Examples include, but are not limited to:

- physical or mental health needs (including those covered under the Mental Health Act 1983)
- learning disabilities, neurodiversity, or Special Educational Needs and Disabilities (SEND)
- domestic abuse
- bereavement
- veterans or those transitioning from armed forces service
- self-neglect or hoarding
- care leavers, ex-offenders, or those previously homeless
- language or communication barriers
- financial hardship or debt

Disability

As defined by the Equality Act 2010, a physical or mental impairment that has a substantial and long-term adverse effect on normal day-to-day activities.

Reasonable adjustment

A change, physical, procedural, or communicational, to avoid or minimise disadvantage for a disabled person or someone with relevant needs.

Inclusive services

Services designed and delivered in a way that is accessible, equitable, and responsive to different needs, including those not covered by the Equality Act 2010.

Identifying and recording

We will identify and record vulnerabilities or adjustment needs through:

- self-declaration at tenancy sign-up or during tenancy
- observation by colleagues, contractors, or partners
- referral from statutory or voluntary agencies
- information gathered during lettings and allocation, with consideration for long-term tenancy sustainment
- annual reviews, Annual Customer Conversation and ongoing contact

All relevant details will be recorded in D365, including:

- protected characteristics
- known vulnerabilities/disabilities/support needs
- communication preferences and named representatives
- agreed reasonable adjustments

We will only record or process information about a customer's vulnerability where there is a clear lawful basis under the Data Protection Act 2018 / UK GDPR, such as where:

- the customer has given explicit consent
- processing is necessary to protect someone's vital interests
- processing is necessary for the organisation's public task as a social landlord

No vulnerability information will be recorded without a lawful basis or valid consent. Records will be reviewed periodically to ensure accuracy and continued relevance.

This information is kept secure and only accessible to authorised staff. Customers will not be asked to repeat their story unnecessarily.

Service delivery

We will:

- consider vulnerabilities and reasonable adjustments before making enforcement decisions, carrying out justification reviews where required
- where enforcement or legal action is considered against a customer identified as vulnerable, complete a review to confirm that all reasonable adjustments, alternative interventions, and partnership options have been explored, and that any action is fair, proportionate, and fully evidenced
- tailor services (repairs, arrears support, visits) to individual circumstances
- offer flexible communication methods and appointment times
- provide translation services and support representatives where required
- apply inclusive practices such as avoiding school pick-up times, prioritising urgent repairs for vulnerable customers, offering quiet/home-based appointments, and signposting to specialist agencies

Making reasonable adjustments

We are committed to meeting our legal duties under the Equality Act 2010.

We will consider all requests for reasonable adjustments and will implement them where it is practicable and proportionate to do so

When deciding whether an adjustment is reasonable, we take into account:

- **effectiveness** – how well the adjustment removes or reduces disadvantage.
- **practicability** – how feasible it is in the circumstances.
- **cost and resources** – including whether external funding or support is available.
- **impact** – on other customers, colleagues, and service delivery.
- **disruption** – the scale and nature of change required.

A reasonable adjustment is a change, physical, procedural, or communicational to avoid or minimise disadvantage. Examples include:

- providing documents in large print or alternative formats
- translation or interpreter services
- using a trusted representative or intermediary to communicate
- allowing flexibility with deadlines or processes
- supporting with form-filling where digital exclusion is a barrier
- carrying out a justification review before legal action if a customer has declared a disability
- providing physical aids or adaptations (such as ramps, grab rails, stairlifts), often in partnership with local authorities and through Disabled Facilities Grants

Requests can be made at any point via website, phone, portal, or in person. Long-term adjustments will be recorded on the customer record so they are applied proactively in future contact.

Where a request cannot reasonably be met, we will explain the reasons clearly and advise customers of alternative support or their right to raise a complaint or appeal.

All requests will be considered on a case-by-case basis. When deciding what is reasonable, we consider:

- the effectiveness of the adjustment
- the practicality and cost
- the impact on other customers or service delivery

Where long-term adjustments are agreed (e.g. specific communication needs), this will be recorded on the customer record, and we will aim to apply them proactively in future contact.

Supported decision-making

Where a customer lacks capacity, we will work with their legal representatives in line with the Mental Capacity Act 2005 and, where relevant, the Care Act 2014 to ensure decisions are made in the individual's best interests, following the least restrictive option principle.

Our commitments

We are committed to making sure that every customer can access services that are fair, inclusive, and responsive to individual needs. When it comes to recognising and responding to vulnerability or providing reasonable adjustments, we will:

- treat you with dignity, compassion, and respect at every stage of your customer journey
- recognise that vulnerability can affect anyone and respond without judgement.
- avoid asking you to repeat your story unnecessarily, recording agreed adjustments securely so they are applied consistently
- make reasonable adjustments proactively wherever possible and respond quickly to requests
- provide information in accessible formats and ensure communication meets your needs
- take account of vulnerabilities and adjustments before making enforcement or tenancy decisions, always considering fairness and proportionality
- work in partnership with you, your representatives, and relevant agencies to provide the right support at the right time
- learn from feedback, complaints, and lived experience to continually improve how we support customers with vulnerabilities
- handle your personal information lawfully and transparently, recording vulnerabilities only with your consent or another clear lawful basis, and reviewing records regularly for accuracy

EIA statement

An Equality Impact Assessment (EIA) has been completed for this policy. The EIA ensures that the policy is fair, inclusive, and does not negatively impact any protected groups under the Equality Act 2010. The outcomes of the assessment will be monitored, and actions taken where needed to promote equity.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

Training statement

This policy will be trained out to all customer-facing colleagues through:

- induction training for new starters
- annual refresher training
- team-based briefings and e-learning
- inclusion in mandatory safeguarding and equality training

Measuring effectiveness

The effectiveness of this policy will be measured through:

- reviewing vulnerability and adjustment flags on customer records
- monitoring Annual Customer Conversation activity and outcomes
- tracking use of translation and representative services
- reviewing equality and enforcement assessments before legal action
- auditing colleague compliance with mandatory training
- customer voice measures – feedback, complaints analysis, and Tenant Satisfaction Measures (TSMs) broken down by vulnerable customer groups
- oversight by the Customer Experience Leadership Team and reporting to the Board

Review period

This policy will be formally reviewed every three years. Earlier review may take place if required by changes in legislation, regulation, organisational priorities, or following feedback from colleagues, customers, or stakeholders. Any updates will be approved through the appropriate governance route.

Approval

This Policy was approved by Customer SLT and is applicable to:

- Bromford Housing Association Ltd (operating as Bromford)
- Bromford Home Ownership Ltd (operating as Bromford)
- Merlin Housing Society Ltd (operating as Bromford)
- Flagship Housing Limited (operating as Flagship) and the following housing divisions: Samphire Homes, Victory Homes, Newtide Homes

Any references to Bromford Flagship LiveWest should be interpreted as equally applicable to all the above.

For internal use only –

Supporting documents

This policy is supported by:

- Applies across all policies and Customer Service Standards
- Equality Impact Assessment

Version control

Note: minor updates approved by delegated authority increase version number by 0.1; major updates and formally approved versions increase version number by 1.0.

Version	Detail	Approved by	Date
1.0	First issue	Customer SLT	16 December 2025