



City of
Stoke-on-Trent

Vulnerability and Reasonable Adjustment Policy

Contents

1. Purpose	4
2. Scope	4
3. Key Principles.....	4
4. Legal Duties and Regulatory Requirements	5
5. Impact Assessments	5
5.1 Equality Impact	5
6. Policy Details.....	6
6.1 Defining Vulnerability	6
6.2 Identifying Vulnerability and Disability	7
6.3 Recording Vulnerability and Disability and the processing of such information.....	8
6.4 Defining ‘Reasonable Adjustment’	8
6.5 How to request a Reasonable Adjustment.....	9
6.6 Protected Characteristics	9
6.7 Customers Lacking Capacity	10
6.8 Provision of Services	10
6.8.1 Recording and Review of Vulnerability Information	11
6.8.2 Communication Needs	11
6.8.3 Lettings	12
6.8.4 Mutual Exchanges	12
6.8.5 New Tenancy Visits, Tenancy Audits and Proactive Calls.....	12
6.8.5 General Tenancy Support.....	13
6.8.6 Rent Arrears	13
6.8.7 Repairs	13
6.8.8 Fire Safety	14
6.8.9 Anti-Social Behaviour	15
7. Safeguarding.....	15
8. Training and Awareness.....	15
8. Complaints	15
9. Links to other related policies and documents	16
10. Measuring Performance	16
11. Policy Review.....	17
12. Key Contacts.....	17
Appendix 1 – Factors in defining vulnerability	18

Factor 1 Underlying characteristic	18
Factor 2 Ability to act, engage and cope	18
Factor 3 Exceptional life event	18

1. Purpose

Stoke-on-Trent City Council (“the council”) has produced this Vulnerability and Reasonable Adjustment Policy in order to set out the council’s commitment to help vulnerable people access its services and provide ongoing support to sustain their tenancies. This policy ensures the council, as landlord, complies with the Social Housing Regulator’s Consumer Standards under Transparency, Influence and Accountability by ensuring that all customers:

- Have access to good quality and safe accommodation.
- Have choice and protection.
- Can hold the council as their landlord to account.

The policy will ensure that the council provides a consistent and fair approach to providing additional support and it will endeavour to respond flexibly to customers who are facing exceptional circumstances that may make them more vulnerable.

2. Scope

For the purposes of this policy, the term ‘customer’ refers to tenants of Stoke-on-Trent City Council. It is also applicable to a tenant’s permanent household members, the council’s leaseholders and residents on the council’s housing register. The type of support provided may depend on the type of tenancy or lease.

This policy focuses on customers who are vulnerable or disabled but have the capacity to make their own decisions. Where a customer has been assessed as not to have the capacity, or believed to lack the capacity to make decisions, we will work with their appointed representative as set out in section 6.7.

This policy does not aim to explain how we will approach every circumstance where a customer with disabilities or a vulnerability requires a service to be adjusted. Rather, it is a statement of our commitment to ensure customers with vulnerabilities, disabilities or additional needs are not at a disadvantage when accessing our services.

This policy defines what a ‘reasonable adjustment’ is, in what type of circumstances they will be carried out and how a request for a reasonable adjustment can be made.

3. Key Principles

This Vulnerability and Reasonable Adjustment Policy (“the policy”) is built upon the following key principles:

- To use all available information to identify if a customer is vulnerable.
- To assist vulnerable customers in accessing additional services that they may need.
- To make reasonable adjustments to ensure all of our services can be equally accessed by customers with disabilities and other vulnerabilities.

- To provide services that follow the principles and deliver the commitments set out in our Tenants' Charter.
- To ensure the statutory and regulatory responsibilities set out by the Regulator of Social Housing are met.

4. Legal Duties and Regulatory Requirements

This policy complies with the legal and regulatory requirements, including but not limited to:

- Care Act 2014
- Data Protection Act 2018 and the UK GDPR
- Equality Act 2010
- Equality and Human Rights Commission
- Housing Ombudsman Complaints Handling Code 2020
- Social Housing (Regulation) Act 2023

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 6.6, Protected Characteristics), but as a social landlord we recognise that many other customers can be vulnerable for reasons other than the characteristics protected under the equalities legislation, and this policy sets out how we define vulnerability and how we aim to respond to those customers' needs.

The Social Housing Regulator's consumer standards require that landlords must treat all customers with fairness and respect, and must act to deliver fair access to, and equitable outcomes of, housing and landlord services for all customers.

The Housing Ombudsman Complaints Handling Code 2020 states that landlords should “comply” with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs.

5. Impact Assessments

Impact assessments have been considered and applied when developing the policy with particular considerations applied to the area described below:

5.1 Equality Impact

The council recognises that it provides housing for communities which include wide social diversity and is committed to providing equal access to services. This policy aims to treat all customers fairly, with respect and professionalism. In line with the duty placed on the council under the Equalities Act 2010, specific consideration of the impact of this policy has been given to people with protected characteristics, including gender, race, age, disability, religion, sexual orientation and marital status.

The approach adopted within this policy focuses on understanding individual circumstances in order to provide appropriate advice and support; this includes

understanding the needs of customers who have protected characteristics. Consideration will therefore be given, for example, to language barriers, accessibility and cultural issues which may affect a customer's ability to manage their tenancy or seek advice on problems, and resolutions which take account of the individual's beliefs and abilities.

The council will enable all of its customers to have clear information and equal access to available services and information in a range of appropriate languages and formats will be provided when requested.

This policy has been designed to be fully inclusive regardless of the ethnicity, gender, sexuality, religious belief, or disability of service users or tenant.

The Equality Impact Assessment will be reviewed as part of reviewing the policy document in order to inform any changes that may be required.

From time to time the council may ask customers to provide details of their gender, age, religion, disability, ethnicity and sexual orientation in line with the protected characteristics identified within the Equalities Act 2010 to help the council to deliver more effective, appropriate and inclusive policies and practices. All data collected is kept securely, used only for monitoring purposes and is de-personalised at the point of analysis to protect an individual's privacy.

6. Policy Details

6.1 Defining Vulnerability

In the 2022/23 financial year, over half (56%) of households in the social rented sector included at least one person with a long-term illness or disability. The largest disparities relate to levels of homeownership and social renting. Just over half (53.3%) of non-disabled people owned their own home, compared with 39.7% of disabled people. By contrast, a quarter (24.9%) of disabled people rented social housing, compared with 7.9% of non-disabled people.¹

The council defines 'vulnerable' in relation to the provision of its services as customers who:

- Have a particular characteristic which makes it more difficult for the individual to access council housing and related housing services and/or
- Experience an exceptional life event and/or
- Are currently unable to act independently and/or
- Are unable to cope with managing their tenancy without additional support.

¹ <https://researchbriefings.files.parliament.uk/documents/CBP-9602/CBP-9602.pdf>

The council understands that vulnerability can be a dynamic or changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic violence, poverty etc. The more common characteristics, events and factors taken into consideration when considering a customer's state of vulnerability are included at Appendix 1.

Whilst some of the factors are constant, some may be a life event, such as bereavement or domestic violence, which may not necessarily remain a permanent state. It is the interaction of these factors that will determine how vulnerable a person is at any point in time and how much additional assistance they may require to sustain their tenancy.

In addition, an individual's ability to act, engage or cope with everyday activities varies, irrelevant of their age, sex, disability etc and so is an important factor in considering vulnerability.

Given the fluid nature of individual situations, we will proactively strive to keep our information up to date. However, the service can be further improved when customers also keep us informed of their changing circumstances.

6.2 Identifying Vulnerability and Disability

A customer's vulnerability or disability may be identified and recorded by:

- The customer when they apply for housing, or contact the council, or self-refer.
- A council officer who has had contact with a customer in person, on the phone or through any other channel of communication.
- The council's repair and maintenance service and any council appointed contractors.
- A referral from an external agency or organisation.
- A referral from another internal council service.

All relevant teams are trained to be aware of the possibility that a customer may be vulnerable or have additional support needs e.g. from information they receive, or from their own observations during routine work, such as home visits or interviews.

The council's housing services teams are trained to recognise potential signs of vulnerability and additional support needs such as:

- Being a victim of anti-social behaviour, harassment or domestic violence.
- A repeated failure to respond to correspondence or to answer the door when visited.
- Hoarding, self-neglect or other behaviour which results in the person's home/ and or garden becoming damaged, neglected or otherwise unfit for occupation.

The above is not an exclusive list of the signs of possible vulnerability but are provided by way of examples of behaviours which may alert council staff to investigate further and to offer additional help and support.

6.3 Recording Vulnerability and Disability and the processing of such information.

Any information concerning vulnerabilities and recorded by the council as a result of this policy where appropriate, will be shared with other third parties and agencies and council contractors, as considered appropriate and necessary. All processing of information will be done in accordance with the relevant data protection legislation and regulations and the council's policy relating to data protection. All relevant information regarding vulnerabilities will be held electronically in the council's housing management system in accordance with relevant legislation and regulations and council policy relating to data protection.

6.4 Defining 'Reasonable Adjustment'

Under the Equality Act 2010, the council has a legal duty to make 'Reasonable Adjustments' in the following three circumstances:

- If there is a policy, practice or procedure which disadvantages a disabled person significantly more than a person who is not disabled.
- If a physical feature disadvantages a disabled person significantly more than a person who is not disabled.
- If a disabled person without any aids, adaptations or support service would be disadvantaged significantly more than a person who is not disabled.

Reasonable adjustments may be short term or longer, depending on the needs of the customer.

A reasonable adjustment could include a physical alteration to one of our council homes, for example, fitting a lift, providing wider doors or installing an access ramp.

It could include how we communicate with our customers in order to meet their specific needs. For example, providing information in alternative formats such as through a sign-language interpreter.

It may also be a flexible change to one of our policies, procedures or services.

The council recognises that it is not sufficient to merely meet the legal requirements and we will endeavour to provide a human-centred model of service provision. In all circumstances, and in line with the council's policies, the reasonable adjustment will be made to ensure all of our services can be equally accessed by customers with disabilities and other vulnerabilities, as well as those who do not.

When considering whether an adjustment is 'reasonable' or not, the council follows the guidance from the Equality and Human Rights Commission:

- How effective the adjustment(s) will be in assisting a customer with a disability or vulnerability in preventing or reducing the possibility of them being at a disadvantage.
- The practicality of the council making the adjustment(s);
- Availability of resources.
- Any disruption to the service that making the adjustment(s) may cause.

Where a reasonable adjustment cannot be made due to cost or resources, the housing service team will work with the customer to find the most appropriate alternative solution.

6.5 How to request a Reasonable Adjustment

A reasonable adjustment can be requested in the following ways:

- In writing, explaining what the adjustment is and why it is needed. This can be done by letter or email;
- By telephoning our Customer Access Centre.
- Through contact with a Housing Officer or the council's repairs and maintenance service.
- By referral from another council service or other relevant agency;
- By a family member when the customer has been given permission for them to do so;
- A member of the council's housing team may suggest a reasonable adjustment be made, when they are aware it will support the customer's needs.

In most cases we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. However, in some cases it may be necessary for us to consider in more detail how best to overcome the difficulty a customer is experiencing and/or seek advice from expert organisations that can assist with signposting and other forms of support.

6.6 Protected Characteristics

Under the Equality Act 2010, where the council exercises a public function in the provision of its services/functions it must do so having due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

This is commonly referred to as the public sector equality duty.

The Equality Act 2010 sets out certain characteristics which are protected characteristics under the Act. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Whilst the council does not necessarily define all people with a protected characteristic as vulnerable for the purposes of this policy, it will give due consideration to any protected characteristics and its public sector equality duty in deciding any enforcement action under the terms of a tenancy or lease to avoid any inadvertent discrimination. In all cases, the council will take a broad view on what constitutes vulnerability when supporting its customers.

In managing tenancies and leases and delivering services, the council will consider whether its decision would have an unfair or disproportionate impact on the customer compared with another customer who does not have a protected characteristic. In particular, where possession action is being considered, we will ensure that pre-action consideration is given to:

- Whether the customer's behaviour, actions or lack of action is related to their disability.
- Whether the behaviour is putting the health and safety of others at risk e.g. neighbours and the wider community.
- Alternatives to possession action and why they were not suitable.
- Whether possession action is justifiable and a proportionate means of achieving a legitimate aim.

Such considerations will be recorded on the tenancy case notes and/or any other relevant file notes.

6.7 Customers Lacking Capacity

In line with the Mental Capacity Act 2005, the council will liaise with those who have legal authority to act on behalf of the customer or other who lacks capacity. That may be a representative who has or is, a/an:

- Lasting Power of Attorney (LPA).
- Deputyship Order from the Court of Protection.
- Litigation friend appointed in Court proceedings if the customer lacks capacity to litigate.
- Appointee appointed by the Department of Works and Pensions to manage a person's benefits if they lack capacity.
- Independent Mental Capacity Advocate (IMCA) commissioned by the council or other local authority and who are appointed where a person aged 16 or over lacks ability to act or to decide for themselves where to live and has no-one, such as a friend, relative, attorney or deputy to advise or support them.

6.8 Provision of Services

The council will embed within its working practice, the need for a consideration of vulnerable customers' needs, abilities and circumstances in the delivery of its services. This is to ensure that they receive the required support, advice or assistance to sustain their tenancy and live well.

As part of our routine service delivery, the council's housing services team already provide a significant level of support for vulnerable and disabled customers. Where a

vulnerable or disabled customer has been identified, they can be assessed for further advice and support, and, if appropriate may be referred to the Housing Income Advice Team, Adult and Children Social Care Teams and the Social Care Occupational Therapy Team.

Each service area will consider what additional support, or variation in usual service provision is appropriate for vulnerable and disabled customers. This may vary from service to service but some examples include:

- Allowing longer for customers to answer their door when we call for an appointment.
- Arranging a joint visit with a carer/support worker/advocate.
- Offering visits in-person where we would normally provide a phone service.
- Explaining a letter over the phone in addition to sending it or making referrals for additional support.

6.8.1 Recording and Review of Vulnerability Information

The council will record on a customer's account, or application notes in the case of a housing applicant, any known vulnerability or disability on the part of the tenant or other household member, including any particular communication or access needs. The notes will record whether there is anyone with delegated authority or an approved advocate to speak to the council on the customers' behalf, such as a care/support worker or family member/friend. This will ensure our team will have advance knowledge of any additional factors to consider when delivering services. The processing of all data so recorded will be in accordance with the council's data protection policy and all relevant data protection legislation and regulations

The council will proactively check, through planned calls, tenancy audits and any housing related interaction with customers that have the appropriate support flags and communication preferences recorded on our systems, and where information is missing or requires updating, that this will be actioned.

The council's housing teams are trained in how to record and retain a person's vulnerability information. All data will be reviewed regularly to ensure it remains relevant and current and that the information is not retained any longer than necessary.

6.8.2 Communication Needs

Customers will be asked about any communication needs when attending the tenancy sign-up and at other opportunities during their tenancy. Where required, the council will make documents available in other languages and formats such as large print and audio. All information in regard to building and fire safety is provided to customers in their first language and/or required format.

6.8.3 Lettings

When allocating a council home, the council will review any information received on vulnerability to help ensure any offer of housing is right for the individual and their family, as a commitment to longer-term tenancy sustainment. Supporting information may be requested from an appropriate medical professional or other support agency before giving any additional priority due to vulnerability, this will be in line with the Allocations Policy.

Where a customer has an identified vulnerability and it is determined they may have a higher risk of not being able to sustain their tenancy without support, a tenancy sustainability plan will be developed in partnership with the incoming customer and any support services will be offered where applicable. This will ensure there is appropriate support in place from the start of the tenancy to enable the customer to manage their tenancy and live well.

6.8.4 Mutual Exchanges

Vulnerable customers who are registered for a mutual exchange and are unable to access the Homeswapper website due to their vulnerability e.g. elderly people without access to a computer/smartphone or for people where English is not their first language, will also be helped to search for homes.

6.8.5 New Tenancy Visits, Tenancy Audits and Proactive Calls.

Every new customer will have a new tenancy visit within six weeks of their tenancy commencing, and at least one further visit within twelve months.

Tenancy audits are also carried out in regard to existing customers; the frequency of the audit is determined by the property type.

The new tenancy visits and tenancy audit process provides customers with the opportunity to tell the council about any care and support needs they may have, or the needs of any vulnerable household members and any care and support services received or required. Where appropriate, referrals will be made to the council's social care teams or external support agencies for further advice and support, in addition to the ongoing tenancy support provided by the customer's housing officer.

The council, via its Housing Services, may also undertake proactive calls. The purpose of the call is to confirm with the customer that all the personal information held in respect to their tenancy is correct and to provide information on housing related services, whilst seeking feedback on the customer's satisfaction with the quality of the housing service they receive. Should the council tenant disclose that they, or a household member are vulnerable or consider themselves to have care and support needs, this will be recorded on the tenancy account, together with an action being raised for a council housing officer to carry out a general support call to determine and offer any relevant additional housing support and, if considered necessary, make a referral to other services as required. However, in the instance of serious safeguarding concerns an immediate safeguarding referral will be made.

6.8.5 General Tenancy Support

If a customer is identified as vulnerable or in need of extra support to maintain their tenancy, a council housing officer will offer to assist them. This offer of support will include helping the customer address any potential tenancy breaches and advocating on their behalf to resolve housing-related issues. For example, the housing officer could help with repair requests, referrals for adaptations, support with rehousing if the customer needs to move, and referrals to the Income Advice Team for help with income maximisation and budgeting. If a customer requires more specialist support, the housing officer can refer the customer to a more appropriate support provider such as the relevant social care team.

6.8.6 Rent Arrears

All customers must pay their rent on time. The council will offer advice and support to customers who may be struggling to make their payments. Customers who approach the council for help, or who fall into arrears can be referred to our Income Advice Team and other money advice services who can help to maximise their income, provide support in managing budgets, and to set a realistic plan to repay their rent and arrears. Any transfer of data relating to the collection of arrears will comply with the Data Protection Act 2018 and related data protection legislation and council policy.

In addition, the council offers a wide range of payment methods to ensure that there is a suitable method of payment for any customer, including those who may be vulnerable.

Before commencing legal proceedings due to rent arrears, the council will ensure that a customer's vulnerabilities are considered in line with the public sector equality duty to make sure that its actions are fair, reasonable and proportionate.

Being in arrears or in receipt of a low/no income is not in itself regarded as a vulnerability for the purposes of this policy.

6.8.7 Repairs

The council recognises that vulnerable customers may find it difficult to cope if something goes wrong in their home and they may need more help from us to get the problem solved.

We will routinely review repair data to ensure that customers who do not access the repair service and/or are known to be vulnerable are proactively contacted and offered the appropriate support, so we can check on the condition of their home to ensure there are no repair and maintenance issues.

When carrying out housing repairs, the council's repair service will suggest to the customer that they be permitted to notify dedicated housing officers if the customer or resident is potentially vulnerable and requires additional support in respect to

general tenancy management, but also to help facilitate the completion of repair works. In the event that it is considered necessary to make a referral due to the nature of the customers circumstances, a referral will automatically be made.

If it is determined that a repair is going to be significantly disruptive, additional support may be provided to ensure the impact on the customer and their well-being is minimised. Additional support may include:

- Offering appointments that are mutually convenient.
- Offering respite during the hours the repair will be carried out.
- Support with decants to both temporary and permanent alternative accommodation.
- Assistance with moving and storing furniture and belongings if it is not safe for the customer to remain in occupancy.

In such cases, relevant managers from the council and its repairs and maintenance service use operational meetings to review how best to facilitate the support required by the customer, make appropriate decisions in regard to required actions whilst monitoring and reviewing progress against agreed timescales for any necessary repair or improvement work.

6.8.8 Fire Safety

The council recognises that some customers have complex needs that may put them at risk of fire or injury in their homes. Customers who smoke in their homes and/or are hoarders and/or have limited mobility or a physical impairment could be at greater risk of fire. When a customer is identified as vulnerable and falls into this category, the housing officer will carry out a Person-Centred Fire Risk Assessment (PCFRA) to help the customer live safely in their home and ensure that any mitigation is put in place. This may include (although this list is not exhaustive):

- Misting or sprinkler systems where not already installed.
- Additional smoke alarms.
- Specialist smoke alarms suitable for hearing impaired customers.
- Fire retardant bedding.
- Specialist ashtrays.
- Vibrating pad if hearing impaired.
- Flashing beacons and illuminated wayfinding signage if visually impaired.
- Smoke alarms linked to the council's First Responder Service.
- Support with rehousing to more suitable accommodation.
- Provision of fire safety advice in an appropriate format.

The Person-Centred Fire Risk Assessment is reviewed every 12 months, or sooner if the customer advises of a change in their personal situation such as a deterioration in their health, wellbeing, mobility or a disclosure of a disability and/or vulnerability.

The council is committed to working in partnership with Staffordshire Fire and Rescue Service (SFARS), and other agencies to protect vulnerable and disabled

customers in their homes and to working in a person-centred way to protect customers.

Where customers live in blocks of flats with internal communal areas, the council will ensure that if a customer has a known vulnerability, SFARS are provided with information at an individual block level in regard to the flat number and the customer's vulnerability category. This will enable SFARS to safely assist and/or evacuate the customer in the event of a fire. In accordance with GDPR and the Fire Safety Order 2022, the information provided is restricted to a minimal amount of personal information but sufficient to inform SFARS which customers would need assisted evacuation, in addition to the number of Firefighters and any specialist equipment required to do so. Each block of flats has a secure service information box (SIB) accessible to SFARS that contains vulnerability information which is refreshed weekly.

6.8.9 Anti-Social Behaviour

The council recognises that anti-social behaviour (ASB) may be directed towards a vulnerable individual or household because of prejudices held by a perpetrator. It is acknowledged that in some instances vulnerable customers may be reluctant to report ASB to the council and may be less able to cope with what may traditionally be regarded as low-level anti-social behaviour.

As such, a victim-centred approach is taken for all reports of ASB and a victim vulnerability risk assessment is carried out in all cases. This tool helps to measure any additional risks to vulnerable victims.

It is recognised that perpetrators as well as victims of ASB can be vulnerable adults, too. Therefore, before commencing legal proceedings, we will ensure that proportionality assessments are carried out in line with the public sector equality duty to make sure that our actions are fair, reasonable and proportionate.

7. Safeguarding

Safeguarding concerns will be raised with the relevant social care team in line with the council's Safeguarding Policy, which sets out how we identify and support vulnerable adults and children at risk.

8. Training and Awareness.

All relevant housing staff will receive the appropriate training to enable them to carry out their responsibilities, as outlined in this policy.

8. Complaints

The council actively encourages all customer feedback about its services, and uses complaints, comments and compliments to review and improve our services.

A complaint is an expression of dissatisfaction however made, about the standard of service, actions or lack of action by the council, its own staff or those acting on its behalf, affecting an individual customer or group of customers.

If a customer is dissatisfied with a service that has been provided, they can make contact via:

- Stoke-on-Trent City Council's formal Complaints Procedure. Details are available from any council office or online via: <https://www.stoke.gov.uk/>
- Email at – customer.feedback@stoke.gov.uk
- Telephone – 01782 234234
- Message via social media – Facebook / Twitter

9. Links to other related policies and documents

This policy forms part of a wider policy framework relating to the operation of Housing Revenue Account Services and should be considered with the following key policies and documents:

- Domestic Abuse Policy.
- Tenancy Management Policy
- Estate Management Policy.
- Allocations Policy.
- Anti-Social Behaviour Policy.
- Decant Policy.
- Mould and Damp Policy.
- Adaptions Policy.
- Tenancy Audit.
- Personal Fire Risk Assessment.
- Data Protection Policy

10. Measuring Performance

The council will monitor and learn from the feedback received about how vulnerability information is obtained, recorded and managed to ensure we maintain a high standard of services. Performance in relation to the implementation of this policy will be monitored through the Housing and Community Safety Directorates performance framework, to include, but not limited to:

- The number of tenancy audits, tenancy visits and proactive calls completed annually and how many identified a new vulnerability or safeguarding requirement.
- The number of customers with a recorded vulnerability or a protected characteristic.
- The number of tenancy related enforcement cases which have progressed to legal action where the customer has been identified as vulnerable and/or has a protected characteristic to ensure the council's Public Sector Equality Duty has been fully considered.

Feedback to customers using the principles set out in the Housing Customer Engagement Strategy and the service standards in the Tenants' Charter will provide assurance of our compliance with this policy and allow people who live in our properties to make recommendation on how they can make changes to the policy.

11. Policy Review

The Vulnerability and Reasonable Adjustment Policy will be reviewed on a 5-year cycle dependent on any significant changes in legislation and or regulatory changes or good practice requirements.

12. Key Contacts

For comments or complaints about a service contact the customer feedback team:

- Online form: <https://www.stoke.gov.uk>.
- Email customer.feedback@stoke.gov.uk.
- Telephone: 01782 234234.
- Post: Customer Feedback Team, Stoke-on-Trent City Council, Floor 2, Civic Centre, Glebe Street, Stoke-on-Trent, ST4 1HH.

For comments in relation to this policy and its development contact the Regulatory and Strategic Services Team:

- Email: housing.strategy@stoke.gov.uk

Appendix 1 – Factors in defining vulnerability

Below are the more common factors to take in to consideration when considering a customer's state of vulnerability. The categories do not list every possible factor as the whole spectrum of who could be regarded as vulnerable at any point in time is wide.

Factor 1 Underlying characteristic

People in these groups may not always require additional support just because of this characteristic:

- Older people (particularly those 75 years or older).
- 16 – 21-year olds.
- Disabled people.
- Care leavers.
- Lone parents under 21 years old.
- Refugees or asylum seekers.
- Carers.
- Families with disabled children.
- Ex-service personnel.
- Those living with a terminal illness.

Factor 2 Ability to act, engage and cope

People may lack ability because of having one or more of these factors:

- Learning disability.
- Mental illness.
- Autism Spectrum Disorder.
- Permanently impaired mobility or frailness.
- Chronic, debilitating health conditions.
- Addiction / serious substance or alcohol abuse.
- Low level of literacy.
- Low or no English language skills.
- Age related conditions that impact on independent living.

Factor 3 Exceptional life event

People may not have factors 1 and 2 but may have recently experienced an exceptional or traumatic event, and so may be vulnerable at this point in time:

- Recent history of street homelessness.
- Recently moved from supported accommodation to independent living.
- Bereavement following the death of a partner, child or other close relationship.
- Having recently left care as a young person.
- Sexual or racist abuse or serious harassment or other hate crime.
- Recent experience of domestic violence.

- Living in or recently left a refuge or homeless persons hostel.
- Recently discharged from hospital or other institutional care.
- Periods of sustained physical or mental illness at home.
- Multiple debts and unable to meet basic needs e.g. fuel or food poverty.
- Pregnant women.
- Recently given birth, still born or miscarried.
- Recently released from prison after a custodial sentence.
- Families with children excluded from school.
- Ex-service personnel returning from area of conflict.