



Vulnerability, Protected Characteristics and Reasonable Adjustments Policy for Customers

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Policy Statement

This policy will help Broadacres colleagues provide an accessible and inclusive service to you and will make sure we do not discriminate by not recognising, not responding to or not recording a disability, or by not taking into account an agreed 'reasonable adjustment'.

This policy is a general statement and Broadacres understands that everyone's needs are different, and each solution should be personalised to each Broadacres customer.

1. Definitions

- 1.1 Vulnerability: A combination of personal circumstances and characteristics that can change over time. If effective 'reasonable adjustments' have been put in place, the vulnerability may be reduced.
- 1.2 Protected Characteristics: The Equality Act 2010 says there is a legal duty to provide equal opportunities between people who have a protected characteristic and people who do not.
- 1.3 Reasonable Adjustments: Broadacres has a duty to make 'reasonable adjustments' to make sure you can access or use our services.

2. What is vulnerability

- 2.1 Broadacres has a duty to make sure we make 'reasonable adjustments' so anyone with a 'protected characteristic' can access or use our services. The 'protected characteristics' are:
 - age
 - disability
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - religion / belief
 - sex
 - sexual orientation
- 2.2 Broadacres understands there may also be customers who are vulnerable for different reasons than those listed as protected characteristics in the Equality Act 2010.
- 2.3 We are not able to give examples for every situation where you may be vulnerable, and having a vulnerability does not always mean you need support. There are some circumstances that are more likely to mean you have a vulnerability and you can also move in and out of vulnerability.

2.4 An ability to act, engage or cope with everyday activities can vary and is an important part of what we consider when understanding vulnerability. Some examples include customers who:

- have experienced domestic abuse and need their door locks changing or need window locks fitting
- are a victim of anti-social behaviour or hate crime
- have mental ill health affecting their ability to pay their rent
- are hoarding, self-neglecting or displaying some other behaviour which results in an unsafe home
- have issues maintaining their tenancy
- are in dispute with neighbours
- fail to respond to letters, telephone calls and emails or don't open their door when we visit
- have suffered from financial hardship
- have suffered from bereavement
- have had a relationship breakdown

2.5 The list below gives just a few examples of things that could indicate you have a vulnerability and/or, a 'protected characteristic'.

- You have sensory difficulties, such as sight or hearing impairments.
- English is not your first language.
- You are socially isolated or lonely.
- Disabilities limit your mobility.
- You have learning disabilities.
- You have mental ill health.
- You are frail or elderly.
- You suffer from alcohol or substance misuse problems.
- You are experiencing domestic abuse or harassment.
- You lack the ability to make decisions (Mental Capacity Act 2005).

3. How we identify 'reasonable adjustments'

3.1 You may not always feel comfortable disclosing your circumstances straight away, so general day to day contact will be used to identify when you may be living in vulnerable circumstances.

3.2 When we first contact you, we aim to find out your information and communication needs, including your basic personal details and any details of your nominated representative, if needed.

3.3 We will ask if you need additional support and explain how we usually deal with the issue that has been raised. We will then ask if you need any extra support, for example because of a disability or a special circumstance. This gives you an opportunity to tell us about your circumstances and any 'reasonable adjustments' which should be considered.

3.4 You can communicate with Broadacres by telephone, by email, in person with any Broadacres colleague, on social media and by post. Our contact centre and website offer ways to communicate with Broadacres, including access to lots of services using accessibility tools, such as screen readers, translation and large print.

3.5 Basic personal details include your name, preferred name, title, pronoun, address, correspondence address, telephone numbers and email address.

3.6 You can confirm if you want another person or organisation to represent you at any point. We will record your representative's details along with your consent.

3.7 Your communication requirements will be recorded on your account, alongside other information, including:

- how you would like us to contact you, such as email, telephone, by post – we will try to use this way of communicating, but if this is not possible, we may need to use other ways, but we will tell you why.
- what we should know or consider when contacting you, such as telephoning at a certain time.
- if you need translation or interpretation services and the language you prefer to use.

3.8 Your basic details and communication information, collected when we first contact you, helps our colleagues to:

- address you correctly, using your preferred name and pronoun
- use your preferred contact method
- use your preferred communication channel

Colleagues will take these steps to make sure your needs are met when we communicate with you.

3.9 If you are unsure if our usual service meets your needs, or if it does not allow us to effectively communicate with you, we will offer a tailored service to you.

3.10 The tailored service requires us to assess your needs to help us understand and establish if and how this can be done.

3.11 If we are not able to meet your needs through "our service offer" we will work with you to provide an appropriate, reasonable and practicable adjustment to our service.

3.12 This approach will help us understand how we can best support you. We will ask:

- the reason why you need us to tailor or adjust the service
- what you would like to share with us about yourself, for example, if you have a disability, are neurodivergent or have a vulnerability

- if you need support to understand the information we provide
- what you would like us to take into account when communicating with you
- what you would like us to do differently (providing options and suggestions of how we can change the service, linked to the information you have shared with us)
- if there is any other information you want to share about your household, including other people living in your home (this helps us to understand if someone you live with is disabled, neurodivergent or vulnerable, which should be taken into account, when considering your request)

3.13 Your household information gives us a better understanding of your needs. This helps us to assess your request, what we can achieve and what is deliverable.

4. Asking for a ‘reasonable adjustment’

4.1 If you ask for a Reasonable Adjustment, we will:

- never make assumptions about whether you need an adjustment or what that adjustment may be
- always consider the best way to overcome the difficulty facing you
- think about the effectiveness of the adjustment to make sure it fully addresses what it's meant to overcome
- consider if we're able to provide the reasonable adjustment. For example, if you ask for additional time to read documents but there is a legal deadline out of our control that means we can't provide this.
- think about things like costs, number and skills of colleagues
- put the reasonable adjustments into place with minimum delay
- let you know if more time is needed to look into your request
- seek advice from expert organisations or signpost you to other specialist support if needed
- keep you up to date about their request

5. How we decide what is reasonable

5.1 The most relevant factors are:

Effectiveness: Is the adjustment designed to address the disadvantage it is meant to overcome?

Practicality: Is it possible for us to provide extra time when there are legal deadlines to meet?

Resources: This is not just about cost; it may involve other things such as the time colleague's spend on the adjustment. If an adjustment requires lots of resources, it may not be seen as reasonable. In practice, many ‘reasonable adjustments’ involve little or no cost, or extra resources, and are easy to do.

- 5.2 If we change policies, criteria or practices we do not need to change the basic nature of the services we offer.
- 5.3 It would not usually be reasonable to devote our resources to a single customer. While it may solve the issue for that one customer in a short term, it could affect the services that we deliver to all customers. The amount of extra time provided must therefore be 'reasonable' in all circumstances.

6. The types of 'reasonable adjustments' we can offer

- 6.1 There is no set list as each 'reasonable adjustment' is suited to each person's needs. Examples could include:
 - providing information in different ways, such as braille or audio
 - extending time limits (where there isn't a legal time limit set)
 - sending letters or emails in large print
 - changing a meeting venue to one that is easily accessible
 - offering rest or comfort breaks in meetings
 - communicating with people you have asked to represent you
 - using a password when calling you or visiting your home
- 6.2 Where required, we will tell you about, or refer you to, other specialist services, such as:
 - GPs and other health services
 - mental health services
 - adult social services (care/support/safeguarding)
 - local authority (Occupational Health).
 - substance misuse services
 - domestic abuse services
 - debt advice/welfare benefit services
 - advocacy services

7. If you are unhappy with a 'reasonable adjustment'

- 7.1 We'll always work with you in a fair way, free from discrimination. If you are unhappy with an agreed 'reasonable adjustment', you can make a complaint.
- 7.2 Details of how to make a complaint are in our Complaints Policy on the Broadacres website at www.broadacres.org.uk