

Household Vulnerability and Reasonable Adjustments Policy

Department: Housing and Environment (Housing Management)

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Contents

1. Scope	1
2. Aims and objectives	3
3. Legislative and regulatory context	4
4. Defining vulnerability	8
5. Recognise, record and respond	9
6. Financial inclusion	14
7. Digital exclusion	15
8. Partnership working	15
9. Data protection	17
10. Complaints	17
11. Monitoring, compliance and review	17
12. Diversity and inclusion	17
13. Implementation	18

1. Scope

Ealing Council is committed to ensuring that vulnerable residents are supported, and that household vulnerability and reasonable adjustment requirements are taken into account when providing services to residents.

Ealing Council is committed to ensuring that the services provided to residents are accessible and that we consider the diverse needs of our residents when providing services. We are also committed to ensuring that our residents are treated with fairness and respect.

Ealing Council manages:

- 9,301 general needs homes
- 1,114 sheltered housing homes
- 4,782 leasehold properties

This policy sets out how we will ensure that we consider the diverse needs of our residents when providing services and how we will support residents to sustain their tenancies or leases.

It is important to ensure that we seek to understand the support needs of both tenants and leaseholders.

This policy applies to council residents by which we mean council tenants who hold a secure tenancy agreement and council leaseholders who hold a lease where the council is the freeholder. This policy also covers the tenants of leaseholders where they have sub-let the property.

This policy sets out the council approach to recording household vulnerability information, recording reasonable adjustment requirements and how this information is used to influence the services we provide to residents.

Ealing Council is committed to safeguarding vulnerable residents. Ealing Council adult services follow the London Multi-Agency Adult Safeguarding Policy and Procedures. Ealing children's services use safeguarding procedures provided by the London Safeguarding Children Partnership. The housing management service uses a housing safeguarding procedure.

This policy also covers contracted services such as repairs contractors. We have produced a safeguarding procedure for

contractors which sets out the process for reporting any concerns about vulnerable residents to the housing management service.

This policy does not assume that a whole group of people are vulnerable. For example, it is not correct to assume that all older people are vulnerable, or that all disabled people are vulnerable.

2. Aims and objectives

Ealing Council is committed to meeting the requirements of the Regulator of Social Housing in relation to the Transparency, Influence and Accountability Standard which includes standards relating to the diverse needs of residents.

In relation to diverse needs, the Regulator sets out specific requirements including:

- registered providers must use relevant information and data to:
 - a) understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs
 - b) assess whether their housing and landlord services deliver fair and equitable outcomes for tenants
- registered providers must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants
- registered providers must ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required
- registered providers must allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services

One of the key strategic aims of the Council Plan 2022-2026 is to fight inequality. The Council Plan states:

- We want to create a borough where we work hard to address inequalities in all its forms, to ensure that no-one is left behind in achieving their potential.
- Relentlessly focusing on reducing poverty and inequality for those that most need support and promoting wellbeing and safety for all.

We also want to ensure that we follow the guidance provided by the Housing Ombudsman. In January 2024, the Housing Ombudsman published a Spotlight report titled 'Relationships of Equals'. The Ombudsman states:

- Landlords need to empower themselves with knowledge about their residents and homes to be more proactive and effective, but too often the records on vulnerabilities are incomplete or ignored.
- Landlords must also transform their vulnerable persons policy from a passive document to an embedded practice. This means continuously stress testing it against the 3Rs – recognise, respond and record vulnerabilities.
- It is vital that landlords are confident their complaint procedure is accessible to vulnerable residents, and they are aware of the Ombudsman.

3. Legislative and regulatory context

3.1 Legislation

The **Equality Act 2010** requires us to provide reasonable adjustments for people who are disabled. Under the Act, this means they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

For our residents a reasonable adjustment could relate to aids and adaptations that support a resident to remain in their home or an

adjustment to the services we provide to residents such as taking into account that a resident needs longer to answer the door, requires translation or communication through a third party.

Ealing Council will endeavour to meet the needs of our residents including those that have a disability as defined by the Equality Act 2010.

The **Care Act 2014** requirements include:

- identifying residents who might have care and support needs that are not being met
- provide information to residents about the types of care and support that are available
- provide information about how people can raise concerns about the safety or wellbeing of someone who has care and support needs

The **Fire Safety (England) Regulations 2022** included the following requirement:

- high-rise residential buildings must have a secure information box installed on the premises
- the regulations do not require a responsible person to include in the box any personal or sensitive information about residents.

It was recommended by Phase 1 of the Grenfell Tower Inquiry that the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition).

Disability Rights UK have stated that “There is nothing stopping social landlords from making PEEPs a part of their everyday business. The fact that government guidance hasn’t been published should not be used as an excuse for inaction,”.

Personal Emergency Evacuation Plans (PEEPs)

The housing management team manage person centred fire risk assessments (PCFRAs) for residents living in high rise blocks (HRBs). These are completed for residents who require evacuation support in the event of an evacuation. These assessments are completed by sheltered housing officers for sheltered tenants.

Whilst the provision of PEEPs has not been made a legal requirement, Ealing Council are providing information within the premises information boxes relating to residents who would need support in the event of an evacuation of the building.

Under the **Fire Safety (Residential Evacuation Plans) (England) Regulations 2025**, new regulations relating to PEEPs will apply from 6 April 2026. We will ensure that our procedure is amended to comply with the new regulations.

3.2 The regulatory framework

The Regulator of Social Housing Transparency, Influence and Accountability Standard sets out a range of expectations in relation to supporting our residents.

In relation to the diverse needs of residents, we must use relevant information and data to:

- understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs
- assess whether our landlord services deliver fair and equitable outcomes for tenants

We must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.

We must ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting

tenants and prospective tenants to use online landlord services if required.

We must allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services.

In relation to engagement with tenants:

We must provide accessible support that meets the diverse needs of tenants so they can engage with a wide range of meaningful opportunities to influence and scrutinise our strategies, policies and services and we must assist tenants who wish to implement tenant-led activities to influence and scrutinise our strategies, policies and services.

3.3 Managing complaints

The Housing Ombudsman Complaints Handling Code 2024 states the following in relation to vulnerable residents:

- landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk
- landlords must make it easy for residents to complain by providing different channels through which they can make a complaint
- 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
- landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010
- landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed
- any agreed reasonable adjustments must be kept under active review
- any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010

4. Defining vulnerability

4.1 Vulnerability

The Housing Ombudsman Service 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.

The Ombudsman states: This approach places the emphasis more on individual circumstances as well as what can both increase and reduce a resident's vulnerability. It recognises that vulnerability and any associated additional needs may change and can be influenced by external factors, including how parties interact with the resident and whether they ensure adjustments are considered and made.

Landlords' approach to vulnerabilities is vital, including the need to recognise, adjust and respond to their residents' individual circumstances. Social housing residents are ageing, increasingly vulnerable and disadvantaged. Landlords must adjust approaches and attitudes to meet the needs of this changing population. Without this approach, residents are at risk of being labelled, but without any of the associated benefits a label can bring.

A vulnerability is an issue that impacts upon the life of a resident leading them to require additional support and a need for a tailored or enhanced housing service.

4.2 Household vulnerability

Ealing Council will take account of all reported vulnerability within a household. It is important that we seek information about all

household members to ensure that this is considered when providing services.

It is important to recognise that a resident may have a number of vulnerabilities and there may be multiple vulnerabilities within a household. A resident's vulnerability may apply for a limited period or could be a long-term issue that applies for the duration of the tenancy or lease.

It is important that as a council we ask residents whether there is any vulnerability within their household that they would like us to be aware of and whether there are any reasonable adjustments required. It is important that we seek consent from residents to record this information and to set up any alerts. Not all residents will want to tell us about vulnerability in their household and residents may not give consent to recording this information.

It is important that frontline staff do not make any assumptions about vulnerability and that we only record vulnerability information where a resident has provided the information and given consent.

5. Recognise, record and respond

This policy sets out how we will ensure that we comply with the Ombudsman guidance in relation to recognising, recording and responding to household vulnerabilities and reasonable adjustments.

5.1 Recognising

Training: We ensure that our frontline teams receive training in relation to raising awareness of identifying safeguarding concerns, resident vulnerability, reasonable adjustment requirements and resident support needs. This training will apply to both our housing management teams and our contracted services that interact with our residents. This will include:

- housing officers

- income officers
- tenancy sustainment officers
- financial inclusion officers
- homeownership officers
- sheltered housing officers
- repairs surveyors
- estate caretakers
- contracted repairs operatives

Sign-up: We ensure that we collect information about household vulnerabilities and reasonable adjustment requirements at the point of tenancy sign up. This will be completed by housing officers for general needs lettings and sheltered housing officers for sheltered lettings. We will seek consent from residents to set up any housing management system alerts required.

Arranging a repair: We ensure that all residents who contact the repairs contact centre to arrange repairs are asked whether there is any vulnerability in the household or any reasonable adjustment needs that they would like us to be aware of. Where there is no alert set up within the housing management system, we will arrange to set one up where a resident provides consent.

Reporting ASB: We ensure that we ask residents reporting ASB whether they have any household vulnerability that we need to be aware of and any reasonable adjustments that they require.

Complaints process: We have amended our complaints reporting process to ensure that we ask residents reporting ASB whether they have any household vulnerability that we need to be aware of and any reasonable adjustments that they require.

Resident Census: We will use a resident census to collect information about any household vulnerability and reasonable adjustment requirements and use this information to set up relevant alerts within the housing management system.

Home visits: Our housing officers carry out tenancy verification home visits where they may identify vulnerable residents who may need additional support and make referrals for support as required.

We will ensure that anyone can raise a safeguarding referral on behalf of a resident through the council website.

5.2 Recording

We use alerts within the housing management system to record protected characteristics and to flag household vulnerabilities and reasonable adjustments required where a resident has given consent to record this information.

We continue to record third party support workers within the housing management system.

We ensure that any household vulnerability and reasonable adjustment flags are subject to a review process to ensure that they are removed if no longer required.

5.3 Responding

Safeguarding: Frontline staff including:

- housing officers
- sheltered housing officers
- income officers
- repairs contractors

will be trained to recognise safeguarding concerns and to make relevant referrals to adults or children's social care.

Damp and mould: We ensure that household vulnerability is taken into account when prioritising damp and mould repairs.

Disrepair: We ensure that household vulnerability is taken into account when managing disrepair cases.

Reasonable adjustments

We ensure that frontline teams are aware of reasonable adjustment requirements such as arranging translation when supporting residents.

We share reasonable adjustments required with our repairs contractors when arranging repairs.

A range of service adjustments may be required such as:

- arranging translation for in-person meetings and for any written communications
- giving longer for a resident to answer the door
- arranging contact through a third-party support worker or through next of kin
- contacting a deaf resident by text or email
- arranging a sign language interpreter
- communicating using large type
- communicating using braille
- communication only by phone
- communication only in writing
- prioritising damp and mould work where there is a vulnerability in the household
- providing written communication in large print or braille
- providing hearing loops at housing hubs

Aids and adaptations

The housing service is committed to supporting our residents to remain in their homes. The service follows a housing aids and adaptations procedure which sets out the process for managing tenant and leaseholder aids and adaptations. This includes minor adaptations such as handrails and steps and major adaptations such as wet rooms and stair lifts.

Housing officers, sheltered housing officers and homeownership officers will support residents who require aids and adaptations to

make an application following the housing aids and adaptations procedure.

Providing support

Frontline officers who work with residents will be trained to identify safeguarding concerns and to make relevant safeguarding referrals. Frontline officers will follow the housing safeguarding procedure.

Frontline officers are trained to support vulnerable residents through making referrals for relevant support or through signposting residents to relevant support.

Frontline officers make referrals to the tenancy sustainment officers where a resident needs additional support with managing their tenancy or lease. Referrals are made to the financial inclusion officers for residents who require financial assistance such as support with claiming benefits.

Frontline officers work with allocated support workers to support residents where applicable. This could include social workers, mental health workers and carers.

Frontline officers have been provided with a directory of national and local support providers which they can use for making referrals or for signposting residents.

Residents will be given access to a directory of support services.

Evacuation support – person-centred fire risk assessment (PCFRA)

We encourage residents who may need support in the event of an evacuation from their home to contact us. A housing officer will arrange to visit the resident and complete a PCFRA. Where a building has a premises information box, a form will be completed to be held in the box to alert the London Fire Brigade to any residents with evacuation support needs.

6. Financial inclusion

Residents may be vulnerable due to financial exclusion. This can include:

- difficulty or inability to access mainstream financial services such as a bank account
- struggling due to debt
- a reliance of food banks
- issues with welfare benefits
- low income
- issues with securing employment

We have a specialist income team that support our residents with any financial difficulties. We have financial inclusion officers who can provide additional support to our residents whether this is help with understanding welfare benefits, resolving benefit issues and managing debt.

The income team may make referrals to specialist agencies to support residents when necessary.

The income team make referrals for any relevant funding that is available to support residents who are struggling with their finances. This includes making applications for support from the following funds where applicable:

- discretionary housing payments – to support residents in receipt of housing benefit or the housing element of Universal Credit
- household support fund - provided by the Department for Work and Pensions, gives those who qualify, help towards food and essential items
- homeless prevention fund – an Ealing Council fund for council tenants to help prevent tenants from becoming homeless. Its main purpose is to address immediate financial challenges that could lead to eviction and the tenant's loss of their home

The financial inclusion advisors have been trained and are able to issue foodbank vouchers to tenants living in the borough who are suffering from hardship and need emergency food.

The income team has partnered with Housing Associations' Charitable Trust (HACT) to gain access to the fuel fund, a referral system designed to support residents experiencing fuel poverty, throughout the year.

Given the ongoing cost-of-living crisis, more tenants are falling into fuel poverty, making this fund crucial to the provision of continuous support.

The income team make referrals to Work Ealing to provide residents with employment support.

7. Digital exclusion

Digital exclusion is a significant factor contributing to financial exclusion, as many people are unable to access financial products and other services online.

Digital services have become increasingly prevalent in everyday life for instance Universal Credit is applied for and managed online.

We appreciate that some of our residents are digitally excluded and may lack the technology or experience to engage with digital services.

We are collaborating with the Adult and Community Development Academy (ACDA) to provide training to help tenants build digital skills.

8. Partnership working

The housing service will work in partnership with adult and children's social care, West London NHS (mental health services), police and other blue light agencies, and a range of external support providers.

We will provide a support directory to council residents setting out a wide range of support that is available both from the council and from national and local support providers.

Adult and children's services will share data with housing management to ensure that the services work together to support council residents. Officers within safer communities who have oversight of housing antisocial behaviour (ASB) casework additionally can access social services records in order to assess risk and vulnerability.

The Ealing Safeguarding Adults Board (Ealing SAB) ensures that all agencies in Ealing work together to prevent and respond to abuse and neglect in adults at risk. The board have produced a multi-agency self-neglect toolkit that has been provided to all frontline housing staff.

Where a resident has complex needs (such as in cases where hoarding, vulnerability or exploitation is identified), and frontline teams are struggling to make progress, a referral into the appropriate forum will be considered. Dependent on the circumstances of the case, this may include a referral into the Ealing Multi-Agency Risk Assessment Panel or Ealing's Community MARAC. These panels discuss high risk cases requiring multi-agency solutions.

The Ealing Multi-Agency Risk Assessment Panel considers cases where practitioners need to demonstrate a range of options have been considered or evidence of actions that have been tried to reduce the risks to the individual with no or little effect. The panel focuses on residents who are deemed to be of high risk of harm to themselves or others. Housing management attend all of these panel meetings.

Ealing's Community MARAC is a collaborative meeting where multiple agencies share information to address complex or high-risk cases involving vulnerable individuals in cases that are impacted by ASB. The primary goal is to safeguard victims and witnesses, prevent repeat victimisation, and manage the behaviour of perpetrators through coordinated action plans. The conference is co-chaired by a manager from the council's community safety team and a police inspector from the neighbourhoods strand.

9. Data protection

Residents' information will be processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 legislation and in accordance with the Ealing Council Privacy Notice [Privacy notice | Ealing Council](#)

10. Complaints

The council complaints service standard and complaints policy are available on the council website [Council housing complaints | Ealing Council](#).

These are also available, on request, from our housing hubs and housing officers. The complaints service standard is also provided within the tenant handbook.

When recording a complaint, we will ask residents for their preferred method of contact to help us to stay in touch throughout the complaint process. We will ask residents whether there are any adjustments or additional support that they may require.

11. Monitoring, compliance and review

This policy will be reviewed annually or sooner if there are changes to legislation, best practice or internal arrangements which mean it may no longer be valid, or in the event of a relevant major incident.

General performance and use of this policy and overall risk is monitored through operational progress meetings and key performance indicators for housing and environment, which are reviewed monthly.

12. Diversity and inclusion

The London borough of Ealing is a diverse, multicultural London borough. The council recognises and values the diversity of all

people and communities in the borough and is committed to meeting the needs of all of our residents. [Equality and diversity | Ealing Council](#)

13. Implementation

This policy should be read in conjunction with a range of other policies and procedures:

- Vulnerability and Reasonable Adjustment Procedure
- London Multi-Agency Adult Safeguarding Policy and Procedures
- Landlord Services Hoarding Policy
- Housing Safeguarding Procedure
- Housing Safeguarding requirements for Contractors Procedure
- Housing Aids and Adaptations Policy
- Housing Aids and Adaptations Procedure