



VULNERABILITY AND REASONABLE ADJUSTMENTS POLICY

Accessible services • individual choice • consistent adjustments

PURPOSE

To help NEWPOINT identify barriers, understand what matters to each person and provide accessible, proportionate housing services without stigma, unnecessary evidence or repeated explanations.

Document owner	Applies to	Review
NEWPOINT Housing Group	Residents, applicants, workers, contractors and partners	At least annually and after material change

1. Commitment, scope and principles

NEWPOINT recognises that disability, health, trauma, age, communication needs, financial hardship, caring responsibilities and changing life circumstances can affect how a person accesses or experiences housing services. Needs may be visible, non-visible, permanent, temporary or fluctuate over time.

Principle	NEWPOINT standard
Person-led	Ask what barrier exists and what would help; do not define a person by a label.
Accessible by design	Anticipate common needs in communications, digital services, appointments and properties.
No stigma	Treat disclosure respectfully and never lower service expectations because someone needs support.
Proportionate evidence	Accept the person's account unless limited evidence is genuinely needed for a specific decision.
Consistency	Record agreed adjustments once and apply them across relevant service areas.
Review	Revisit needs after a material change, service failure or request from the person.

ONE CONVERSATION, ONE JOINED-UP RECORD

Do not require separate vulnerability forms for repairs, visits, complaints and resident contact. Record only useful adjustments in the protected CRM and make them visible to staff who need to act.

2. Understanding vulnerability and barriers

Vulnerability is not a fixed category. A person may experience a barrier because their circumstances interact with the property, a process, a communication method or a particular event. NEWPOINT will focus on impact and access rather than requiring a diagnosis.

Area	Possible service impact
Physical or sensory impairment	Access, alarms, printed information, appointments, evacuation or use of facilities.
Learning disability / neurodivergence	Understanding complex information, managing changes, processing time or sensory environment.
Mental health / trauma	Contact, inspections, deadlines, trust, distress, memory or engagement.
Long-term or fluctuating condition	Energy, mobility, treatment schedules, temperature needs or unpredictable availability.
Age, pregnancy or caring role	Mobility, appointment timing, dependants, lifting or emergency planning.
Language, literacy or digital exclusion	Understanding rights, using portals, reading documents or responding promptly.
Financial or housing crisis	Phone/data access, travel, arrears engagement, decision-making or risk of exploitation.
Bereavement, abuse or major life event	Temporary difficulty communicating, organising information or maintaining contact.

DO NOT ASSUME

A missed appointment, delayed reply, arrears or distressed behaviour may indicate a barrier. Check what happened before treating it as refusal, non-cooperation or deliberate conduct.

3. Reasonable adjustments: the operating standard

The Equality Act 2010 requires service providers to anticipate and remove substantial disadvantages experienced by disabled people where an adjustment is reasonable. Adjustments may change a policy or process, provide an auxiliary aid or service, or address a physical feature. Disabled people must not be charged for reasonable adjustments.

Adjustment type	Housing examples
Communication	Large print, plain language, email instead of phone, text reminder, interpreter or more time.
Process	Flexible appointment window, named contact, representative involvement or assisted complaint.
Visit / access	Home visit, additional notice, quiet time, worker gender request where practicable or support person present.
Digital	Non-digital route, help using a portal, accessible document or alternative verification.
Property / equipment	Consider physical alteration, auxiliary aid or safe alternative with landlord/council authority.
Decision-making	Account for disability-related impact, obtain relevant advice and avoid blanket rules.

Reasonableness factors

- Effectiveness in removing the disadvantage, practicality, urgency, cost, resources, safety and disruption to others.
- Whether an alternative achieves the same access where the requested adjustment cannot reasonably be provided.

THE DUTY IS ANTICIPATORY

Accessible service design should not wait for an individual to fail. NEWPOINT will offer different contact routes and publicise how adjustments can be requested.

4. Identifying and requesting support

Route	Action
Person requests an adjustment	Listen, clarify the barrier and desired outcome, and act immediately where simple and safe.
Representative or advocate	Verify permission or lawful authority; continue to involve the person directly in an accessible way.
Staff notice a barrier	Ask privately and neutrally whether a change would help; do not diagnose.
Council / partner information	Confirm relevance, source, safe use and whether details remain current.
Emergency or safeguarding concern	Protect immediate safety and use the relevant policy; an adjustment request does not replace safeguarding.
No disclosure	Keep services accessible and do not pressure the person to reveal medical or personal information.

Three useful questions

- Is there anything that makes it harder for you to use this service?
- What would make communication, appointments or access easier?
- May we record this adjustment so you do not need to explain it again?

A DIAGNOSIS IS NOT THE STARTING POINT

Ask for evidence only where it is necessary and proportionate to decide a complex, costly or disputed adjustment. Explain exactly what is needed and accept appropriate alternatives.

5. Assessment, decision and response

Step	Minimum action
1. Remove immediate barrier	Provide an obvious low-risk adjustment without delay where possible.
2. Understand impact	Record the service barrier, requested outcome, urgency and relevant safety considerations.
3. Check authority	Identify whether NEWPOINT, the landlord, council, prime partner or another body can approve or deliver it.
4. Decide	Approve, propose an effective alternative or escalate for a documented decision.
5. Explain	Give an accessible response, timescale, owner and review route.
6. Implement	Brief only those who need to act and confirm the adjustment works.
7. Review	Reassess after feedback, a material change or evidence the adjustment is ineffective.

NO SILENT REFUSALS

If an adjustment cannot be provided as requested, explain the reason, identify any effective alternative and provide a route to challenge the decision.

6. Recording, privacy and information sharing

Control	Standard
Record the adjustment	Describe what staff must do, not unnecessary diagnosis or medical history.
Person's words	Capture the barrier, communication preference and consent accurately.
Visibility	Use a clear operational alert for relevant teams while restricting sensitive supporting detail.
Safe contact	Separate preferred and unsafe channels; do not overwrite them with third-party details.
Sharing	Use consent where appropriate and share the minimum necessary with contractors and partners.
Accuracy	Confirm significant details periodically and update promptly when the person says needs changed.
Retention	Follow the data-protection schedule and remove duplicated notes or unsupported labels.

RECORD THE ACTION, NOT A LABEL

‘Telephone before attending and allow extra response time’ is useful. ‘Vulnerable resident’ alone does not tell staff what to do and may create stigma.

7. Accessible communication

Need / barrier	Possible response
Visual impairment	Accessible digital text, large print, audio or supported explanation.
Hearing loss	Text/email, relay or interpreter route, visual alerts and quiet meeting space.
Learning or cognitive need	Plain language, Easy Read where appropriate, one topic at a time and check understanding.
English language need	Competent interpreter or translated key information; do not routinely rely on children.
Memory / executive function	Written summary, reminders, clear deadlines, named contact and smaller action steps.
Anxiety / trauma	Agreed channel, predictable appointments, advance explanation and time to respond.
Digital exclusion	Telephone, post, face-to-face or assisted digital route without service disadvantage.

Communication check

- Use clear subject lines, explain action required and provide a real contact route.
- Check whether automated messages, shared devices or correspondence could create risk.

ACCESSIBLE DOES NOT MEAN CHILDLIKE

Use respectful adult language. Simplify structure and explain terms without removing important rights, choices or consequences.

8. Visits, inspections, repairs and property access

Service point	Adjustment standard
Booking	Offer a usable channel, appropriate notice and a manageable appointment window.
Before attendance	Confirm access instructions, communication needs, representative and any relevant safety plan.
At the property	Introduce staff, explain purpose and sequence, allow processing time and respect aids/assistance animals.
Works	Consider noise, dust, loss of facilities, medication, mobility and need for phased or temporary arrangements.
Missed access	Check whether an agreed adjustment was followed before warning, charging or escalating.
Contractors	Share only the instruction they need; contractors must not seek diagnoses or make promises.
Emergency	Safety may require immediate action, but use the least disruptive accessible route and explain afterwards.

ADJUST THE SERVICE, NOT THE SAFETY STANDARD

Reasonable adjustments should enable access to inspections and repairs. They do not remove essential legal, property or safeguarding requirements; staff should find a safe alternative way to meet them.

9. Complaints, arrears, ASB and enforcement

NEWPOINT will consider whether disability, trauma, communication needs or another barrier affected the events, the evidence or the person's ability to participate. This does not predetermine the outcome; it ensures a fair process.

Area	Required check
Complaint	Offer help to raise it, accessible updates, extra time where reasonable and representative involvement.
Arrears	Check communication access, benefit/support issues and financial exploitation before escalation.
ASB report	Agree a usable reporting method and consider impact, risk and communication needs.
Allegation against resident	Provide accessible particulars and a fair opportunity to respond with support where needed.
Contact restriction	Do not impose a method the person cannot use; retain a safe, accessible route.
Legal / contractual action	Confirm adjustments were delivered, relevant impact considered and decision recorded.
Review / appeal	Use a manager not involved where practicable and provide the decision accessibly.

FAIRNESS IS NOT LOWERING STANDARDS

An adjustment changes how a person accesses or participates in a process. It does not automatically excuse conduct, remove contractual responsibilities or decide disputed facts.

10. Representatives, advocacy and decision-making

Situation	NEWPOINT approach
Informal supporter	With permission, allow a trusted person to attend or help communicate.
Advocate	Work constructively and send information through the agreed route while keeping the person involved.
Attorney / deputy	Verify scope and authority; do not assume it covers every decision or all personal information.
Possible capacity concern	Do not infer incapacity from disability, disagreement or an unwise decision; seek appropriate advice.
Communication difficulty	Provide support and time before concluding that the person cannot understand or decide.
Conflicting instructions	Pause non-urgent action, verify authority and seek management/legal/safeguarding advice.
Children interpreting	Use an appropriate adult interpreter except where an immediate emergency leaves no safe alternative.

PRESUME CAPACITY

Adults should be supported to make their own decisions. NEWPOINT does not conduct clinical capacity assessments but will seek the correct statutory or professional route when a decision-specific concern exists.

11. Partnership working and service boundaries

Partner	Typical role
Council / commissioning partner	Placement, statutory assessment, contract decisions and coordinated support.
Landlord / property owner	Consent and funding for property changes within the underlying agreement.
Health / social care	Clinical care, care-needs assessment and statutory support routes.
Occupational therapist	Functional assessment and recommendations for aids or adaptations where available.
Advocacy / voluntary services	Independent support, communication help, benefits or specialist advice.
Emergency / safeguarding agencies	Protection where a child or adult may be at risk of abuse or neglect.
Contractors	Deliver the specified accessible service or works; report barriers to NEWPOINT.

NEWPOINT's role

- Coordinate accessible housing management, make adjustments within authority and escalate needs promptly.
- Do not promise care packages, adaptations, rehousing or partner decisions outside NEWPOINT's control.

A REFERRAL DOES NOT CLOSE THE BARRIER

NEWPOINT remains responsible for its own accessible service and must track agreed actions until ownership and next steps are clear.

12. Staff and contractor responsibilities

Role	Minimum responsibility
All workers	Recognise barriers, offer support, follow recorded adjustments and report failures.
Case owner	Agree the operational adjustment, coordinate teams and confirm implementation.
Managers	Decide escalations, resource reasonable changes and review refusals or repeated failures.
Data / safeguarding leads	Advise on sensitive records, sharing, risk and linked safeguarding routes.
Repairs / property teams	Build adjustments into appointments, access, works and completion communication.
Complaints / enforcement teams	Ensure accessible participation and consider relevant impact before decisions.
Contractors	Follow the instruction provided, maintain dignity and report anything preventing delivery.

Training

- Relevant workers need practical training in disability confidence, accessible communication, trauma awareness and reasonable adjustments.
- Quality checks should test whether staff followed the adjustment, not merely whether an alert existed.

OWN THE HANDOVER

The staff member receiving a request must act or transfer it to a named owner. The person should not be sent from team to team to repeat their needs.

13. Monitoring, complaints and learning

Control	Standard
Adjustment review	Check effectiveness after implementation and when circumstances or services change.
Service failure	Make the immediate process accessible, apologise where appropriate and restore the adjustment.
Complaint	A person may challenge delay, refusal, poor implementation or discriminatory treatment.
Independent review	A manager reviews evidence, reasonableness, alternatives, communication and impact.
Quality monitoring	Use anonymised themes to identify inaccessible processes and repeat contractor failures.
Equality analysis	Consider whether outcomes differ for groups and take proportionate improvement action.
Governance	Leadership reviews significant risks, refusals, complaints, training and improvement actions.

LEARN WITHOUT PROFILING

Use aggregated service information to improve access. Do not create risk scores, stereotypes or adverse decisions from disability or vulnerability labels.

14. Quick-reference adjustment card

Situation	Action now
Person asks for a simple change	Agree and implement it; record the operational instruction.
You notice a possible barrier	Ask privately what would help; do not diagnose or demand disclosure.
Urgent repair / visit	Use the safest accessible route and brief attending staff on essential instructions.
Requested change needs authority	Provide an interim adjustment and escalate to a named owner with a timescale.
Request may not be reasonable	Explore impact and alternatives; obtain a documented management decision.
Representative contacts you	Verify permission or authority and retain accessible direct involvement.
Adjustment was missed	Remove the immediate barrier, apologise where appropriate and prevent recurrence.
Risk or safeguarding concern	Use the relevant emergency/safeguarding policy alongside the adjustment.

Four checks before closing

- Can the person actually use the agreed communication route?
- Do all relevant teams and contractors know what they must do?
- Is sensitive detail restricted while the instruction remains visible?
- Has the person been told the decision, owner, timescale and review route?

ACCESS IS THE OUTCOME

A note in the CRM is not completion. The adjustment is complete only when the person can use the service in practice.

15. Document control and authoritative sources

Version	Date	Owner	Review
1.0	August 2026	NEWPOINT Housing Group	August 2027 or earlier trigger

Authoritative framework

- **GOV.UK - Disability: quick start guide for service providers**

<https://www.gov.uk/government/publications/equality-act-guidance/disability-quick-start-guide-for-service-providers-html>

- **Legislation.gov.uk - Equality Act 2010**

<https://www.legislation.gov.uk/ukpga/2010/15/contents>

- **GOV.UK - Transparency, Influence and Accountability Standard**

<https://www.gov.uk/government/publications/transparency-influence-and-accountability-standard>

- **Housing Ombudsman - Attitudes, respect and rights**

<https://www.housing-ombudsman.org.uk/reports/spotlight-reports/spotlight-on-attitudes-respect-and-rights-relationship-of-equals/>

- **GOV.UK - Care and support statutory guidance**

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

- **GOV.UK - Inclusive communication**

<https://www.gov.uk/government/publications/inclusive-communication>

CONTROL NOTE

Before formal adoption, name the policy owner and escalation manager; configure CRM adjustment instructions and access controls; publish accessible request routes; map council, landlord, advocacy, occupational-therapy and safeguarding pathways; brief contractors; define decision and review timescales; and obtain equality/legal review against each operating model and contract.