

CROYDON COUNCIL HOUSING

Vulnerabilities and Reasonable Adjustments Policy

The Policy outlines Croydon Councils approach to ensure people with vulnerabilities can access housing services and our approach to make reasonable adjustments to our services.



Residents
Reading
Group

Reviewed

This policy was reviewed with the help
of Croydon Housing Residents

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1. Purpose

- 1.1. Croydon is committed to ensuring that residents with disabilities, long term health conditions and vulnerabilities can access a Housing Service that is as close as is reasonably possible to the standard normally offered to their peers
- 1.2. This policy describes our approach to making reasonable adjustments to our services for tenants, leaseholders and prospective tenants to ensure they are treated fairly and with respect

2. Statement of Intent

- 2.1. This policy describes the principles by which we will make reasonable adjustments for residents with disabilities, long-term health conditions, or vulnerabilities, as outlined in all appropriate Legislation as listed in 5.1 of this policy

3. Scope

- 3.1. This policy applies to Council services provided to secure tenants, tenants in temporary accommodation, leaseholders and people applying for housing that the council owns and manages. They will be referred to as “residents”.
- 3.2. A reasonable adjustment is a change made by Croydon Council to reduce or remove the disadvantage faced by individuals with disabilities. These adjustments to service delivery can be tailored to the specific needs of the individual and increase their independence.
- 3.3. Croydon Council will make reasonable adjustments to support our residents’ needs when they access our services. The term ‘reasonable’ refers to what we can do without compromising our resources, efficiency, or ability to practically fulfil requests. This excludes adaptations that we would make under our Aids & Adaptation Policy i.e., ramps, the widening of doors and installation of level access showers.
- 3.4. For children with support needs, please refer to the Council’s Safeguarding Policy.

4. Definition

- 4.1. The definition of disability is set out in section 6 of the Equality Act 2010. A disability or long-term health condition is defined as:
 - a physical or mental impairment
 - an impairment that has a substantial and long-term adverse effect on the ability to do normal day-to-day activities
- 4.2. Vulnerability is defined as someone who needs special care, support, or protection because of age, disability, risk of abuse or neglect.

- 4.3 A person may be vulnerable because of a single problem or condition, or due to a combination of factors. Vulnerability can also occur at different points in a person's life, for instance someone may need support following a traumatic event for a temporary period, whereas others may require support permanently.
- 4.4 We will not assume that whole groups of people are vulnerable, everyone is assessed based on personal needs and circumstances. We will avoid assumptions based on age, disability, and other group characteristics.
- 4.5 The Housing Directorate recognises that people may be vulnerable for a combination of related or unrelated reasons, the following table provides some examples of these:

Vulnerability/Disadvantage	Protective Factor
Characteristics	
<ul style="list-style-type: none"> • Elderly or frail • Care experienced young people • 18-21 year olds • Disability or caring for disabled children • Living with a terminal illness • Refugees or former asylum seekers • Ex-service personnel • People with a history of abuse or trauma, especially from childhood • Sensory needs • Learning needs/disabilities • Autism spectrum disorder 	<ul style="list-style-type: none"> • Strong family/informal support network • Leisure activities and interests
Life Events	
<ul style="list-style-type: none"> • Bereavement • Children living with social services • Care experienced young people • Recently left an institution (e.g. prison or hospital) • Recently left supported accommodation or refuge • Recently experienced domestic, racist, or homophobic abuse • History of fires/arson • Link to criminal gangs • Multiple debts/financial insecurity • Pregnancy, birth, including still birth and miscarriage 	<ul style="list-style-type: none"> • Professional support in place/previously received where needed
Barriers	
<ul style="list-style-type: none"> • Literacy and language • Low/no English • Mental illness • Chronic poor health • Mobility issues 	<ul style="list-style-type: none"> • Able to ask for help when needed • Generally positive and proactive in dealing with adversity

<ul style="list-style-type: none"> • Self-neglect/hoarding • Social isolation • Potentially violent/abusive • Long-term unemployment • Lack of trust in services • Multiple disadvantages 	
Housing Factors	
<ul style="list-style-type: none"> • Overcrowding • Unsuitable from a medical perspective • Damp and mould or other severe repair issues • Ongoing ASB or criminal activity in the block • Unresolved tenancy issue • Significant rent arrears • Hoarding • Awaiting Housing Transfer 	<ul style="list-style-type: none"> • Adequately housed • No repair issues • No Neighbourhood/ASB related issues.

5 Legal Framework

5.1. This Policy will ensure compliance with the following standards and legislation and promote good practice.

Legislation:

- Equality Act 2010
- Care Act 2014
- Mental Health Act 1983
- Children Act 1989
- Fire Safety (England) Regulations 2022
- Fire Safety (Residential Evacuation Plans) (England) Regulations 2025
- The Building Regulations 2010

Guidance documents:

- Complaint Handling Code – Housing Ombudsman
- Equality Act 2010 Code of Practice
- Consumer Standards, Transparency, Influence and Accountability Standard– Regulator for Social Housing

6. Examples of reasonable adjustments we can offer

6.1. The adjustments we make will vary depending on the needs of the person and their situation. Listed below are some examples of adjustments we can make for:

- Giving residents extra time to complete an action, where the law allows it. For example, we can be flexible with some of the timeframes we set ourselves, such as how long residents have to get back to us. However, we cannot extend deadlines that are set in law; for instance, the legal time limits for responding to a Notice of Seeking Possession.

- Providing information in alternative formats such as large print
- Adapting our communication methods where required.
- Providing a translator or interpreter.
- Ensuring that residents with mobility needs can attend resident meetings, and that selected venues have accessible toilet facilities.

7. How residents can request reasonable adjustments

- 7.1. Residents and/ or their representatives can request a reasonable adjustment at any point in their tenancy, or while they are an applicant. These requests most commonly arise at the point of letting or during an occupancy check with a Housing officer.
- 7.2. Residents may request a reasonable adjustment from any member of Croydon Council staff. The request will then be recorded or referred to the appropriate team. Following the initial notification, further conversations may be required with some residents to clarify or discuss their needs.
- 7.3. How residents will know that we offer reasonable adjustments:
- The Vulnerabilities and Reasonable Adjustments policy will be published on Croydon Council
 - Information about some of the reasonable adjustments available will be included in written communications to residents.
 - Staff delivering the landlord function will make eligible residents aware of the reasonable adjustments available, where it is appropriate to do so.
- 7.4. Residents may request a reasonable adjustment in a variety of ways, including:
- Sending a letter or email.
 - Informing an officer over the phone.
 - Notifying an officer during an appointment or home visit.
 - Communicating their needs and requesting adjustments at the point of sign-up.
 - Asking a third party, such as a social worker or family member, to make the request on their behalf. The list is not exhaustive.

8. Our response to requests for reasonable adjustments

- 8.1. We will determine whether we are able to provide a reasonable adjustment based on the following criteria:
- Effectiveness - how well the adjustment is likely to prevent the resident from experiencing disadvantage in accessing services, or the associated outcomes.

- Practicality - whether the adjustment can be implemented easily and without undue difficulty.
 - Resources – whether the resources are proportionate to the expected benefit.
 - Decision – will be made on a case -by-case basis
- 8.2. Referrals to other services will be made if a request indicates that the resident has a serious vulnerability that poses a risk to their life or safety.

9. Recording reasonable adjustments

- 9.1. Information collected about residents' disabilities, long-term health conditions, or other vulnerabilities will be recorded in our resident database (NEC Housing) so that it is accessible to staff who require it to provide landlord services.
- 9.2. Any reasonable adjustments that a resident requires will also be recorded.
- 9.3. We will ensure that all customer records are factual, accurate, and kept up to date.
- 9.4. With the residents' consent, we will record details of any representatives who may act or communicate on their behalf.

10. Performance

- 10.1. The effectiveness of this policy and its associated actions will be assessed in the following ways:
- Monitoring equitable outcomes for residents who identify as having disabilities, long-term health conditions, or vulnerabilities. This includes assessing compliance with the diverse need's requirements of the consumer standards
 - Reviewing the quality and completeness of resident data, including monitoring the volume and accuracy of information recorded in the NEC Housing database.
- 10.2. Insights from monitoring activity will be used to identify trends, highlight areas for improvement, and inform service changes to ensure residents receive fair and accessible services.
- 10.3. The policy will be reviewed annually, or sooner if there are significant changes in legislation, regulation, or operational requirements. Any revision will be approved through the appropriate governance processes.

11. Roles and Responsibilities

11.1. Director of Housing Management

The Director of Housing Management is accountable for ensuring that the Vulnerabilities and Reasonable Adjustments Policy is effectively governed, resourced, and supported at senior leadership level and implemented across all housing

11.2. Head of Housing Management

The Head of Housing management is responsible for developing, implementing, and monitoring the effective operation of the Vulnerabilities and Reasonable Adjustments Policy. Their responsibilities include:

- Ensuring that reasonable adjustments are embedded across all relevant services.
- Informing and advising on service changes arising from monitoring or legislation.

The Head of Housing Management holds the overall responsibility for ensuring compliance with all relevant legislation and regulations. They must maintain up-to-date knowledge of national and local policy developments and ensure that necessary updates or changes are communicated and implemented across Housing Services.

They must also ensure that the Vulnerabilities and Reasonable Adjustments Policy and its supporting procedures are fully embedded in operational delivery and that staff receive the necessary training to fulfil their responsibilities effectively.

11.3. Council Staff and Contractors

Council staff must follow the Vulnerabilities and Reasonable Adjustments Policy, along with all related policies, procedures, and operational guidelines. They are expected to have an awareness of the relevant property-related legislation and regulations to ensure that services are delivered fairly, consistently, and in line with statutory requirements.

Staff and contractors are responsible for understanding their roles and responsibilities and must complete all mandatory training, as well as any additional personal development training provided, to support effective and compliant service delivery.

12. Related Documents

- Aids and adaptations policy
- Safeguarding Policy: Housing Management
- Repairs and Maintenance Policy: Concessionary repairs
- Housing Assistance Policy: Disabled Facilities Grants (DFG)
- Hoarding and Self-Neglect policy

- Person Centred Fire Risk Assessment and Personal Emergency Evacuation Plan Policy.

Link to: [Housing policies, plans and strategies | Croydon Council](#)

13. Glossary of terms

- 13.1. Vulnerability is a dynamic state that arises from a combination of the residents' personal circumstances and their characteristics. Vulnerability may be exacerbated when a social landlord does not act with appropriate levels of care when providing a landlord services.
- 13.2. A reasonable adjustment refers to changes made to policies, practices or terms of an agreement to remove barriers that could disadvantage someone with a vulnerability or disability compared to residents without those vulnerabilities or disabilities.

14. Equalities

- 14.1. The Council is committed to promoting fair and equal access to services and equal opportunities in employment, the procurement of goods and as a community leader. The Council's policies, procedures and day to day practices have been established to promote an environment which is free from unlawful and unfair discrimination, while valuing the diversity of all people.
- 14.2. Discrimination on the grounds of race, nationality, ethnic origin, religion or belief, gender, marital status, sexuality, disability, and age is not acceptable: the Council will take action to ensure no person using the council's premises or services receives less favourable treatment or is disadvantaged by requirements or conditions that cannot be justified. The Council will tackle inequality, treat all people with dignity and respect and continue to work to improve services for all service users.
- 14.3. The legal framework for the Council's approach is provided by the Equality Act 2010 and specifically by the Public Sector Equality Duty, under which a public authority must work consciously to eliminate discrimination, harassment, and victimisation, and to advance equality of opportunity and foster good relations between people with differing characteristics.
- 14.4. Further detail on the Council's duty, and the Council's approach to fulfilling its requirements, can be found on our website.

15. Complaints

- 15.1. Should there be a complaint from a tenant concerning, any aspect of the Vulnerabilities and Reasonable Adjustments Policy, this will be dealt with via the Council's Corporate Complaints policy.

16. Consultation

- 16.1. Stakeholders with responsibility and operational knowledge of the ways in which we can modify housing services for residents who require reasonable adjustments, have been consulted during the development of this policy.
- 16.2. Residents have also been engaged and consulted in the development and review of the Vulnerabilities and Reasonable Adjustments Policy.

17. Monitoring and review

- 17.1. This policy will be reviewed annually, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Council wide policies.

18. Document Control

- 18.1. This is a controlled document and should not be changed unless by authorisation of the policy owner.

Monitoring		
Approved Date:	12.03.2026	
Next Review Date:	01.02.2027	
Effective date:	13.03.2026	
Consultation Review		
Stakeholders review:	28.11.2025	
Legal review date:	21.01.2026	
Residents reading group:	14.12.2026	
Policy owner:	Director of Housing Management	
Ratified by:	Housing DMT	
Equality impact assessment:	The impact of this policy will be measured as it is implemented and used as part of a scheduled 1-year implementation compliance review.	
Compliance review date:		
Version Control		
Version Number	Summary of change	Author and Approver
1.0	New Policy drafted	Developed and reviewed with subject matter experts in Housing and our Residents Reading Group