



# **Diverse and Additional Needs Policy**

**Accent Housing: Diverse and Additional Needs Policy**

**Diverse and Additional Needs Policy v 1.0**

**ACCENTGROUP.ORG**

## Diverse and Additional Needs Policy

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### Purpose:

The purpose of this policy is to ensure that we deliver fair inclusive services that meet the diverse needs of all customers, including those who may be experiencing vulnerability.

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## **1. Introduction**

At Accent, we are committed to recognising and responding to all our customers' needs.

These include customers who may be vulnerable due to a range of circumstances, such as, but not limited to, personal, social or health-related dynamics.

We are committed to recognising and responding to our customers' individual needs with empathy, flexibility and professionalism, ensuring that no customer is disadvantaged in accessing our homes and services.

This policy provides a framework for identifying and recording customer needs and vulnerabilities, adapting service delivery accordingly and embedding inclusive practices across all customer interactions. It supports our wider equity, diversity and inclusion commitments by ensuring colleagues are equipped to recognise and empathise with individual needs and requirements, identify any barriers, make reasonable adjustments and tailor support appropriately.

Through this approach we aim to build trust, improve customer satisfaction and ensure every customer is treated with dignity, respect and fairness at all times.

## **2. Scope**

We recognise customers may have different needs based on their protected characteristics (section 4, page 5), language requirements or additional support requirements. We will adapt our services accordingly ensuring fair, inclusive and accessible support and outcomes for all existing customers and, where possible, future customers.

This policy sets out our approach to:

- Recognising Protected Characteristics (page 5).
- Defining Vulnerability.
- Embedding Key Principles.
- Engaging with customers.
- Making reasonable adjustments.
- Training.
- Monitoring.

## **3. References**

For further guidance and information, please refer to the following documents:

- [The Social Housing \(regulation\) Act 2023](#)
- [The regulator of Social Housing – Consumer Standards](#)
- [The Housing Ombudsman Complaint Handling Code](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [UK General Data Protection \(GDPR\).](#)
- [Equality Act 2010](#)
- [Mental capacity Act 2005](#)
- \*Accent Equity, Diversity and Inclusion Policy
- \*Accent Safeguarding Policy

\*Accent Policies and Procedures can be found in the [Corporate Library](#).

#### 4. Definitions

- **Protected Characteristics:** Specific attributes that are legally safeguarded against discrimination under the Equality Act 2010 in the UK.
- **Vulnerable Customer:** *“Someone whose personal circumstances may make them less able to protect or represent their interest and who may require additional support to access services or achieve fair outcomes.”* Guidance from the Housing Ombudsman.
- **Intersectional Approach:** How various identities, (such as their gender, ethnicity, and sexuality) affect their access to opportunities and privileges.
- **Triaging Process:** How we identify which interactions are the most important and therefore given priority using the data we have available, the information provided and the knowledge of intersectional characteristics.

#### 5. Overview of Protected Characteristics

The Equality Act 2010 outlines nine protected characteristics to prevent discrimination in various settings, including employment, education, and access to services. These characteristics are:

1. **Age:** Protection against discrimination based on a person's age or age group.
2. **Disability:** Individuals with physical or mental impairments that significantly affect their daily activities are protected.
3. **Gender Reassignment:** Protection for individuals who are undergoing or have undergone gender reassignment.
4. **Marriage and Civil Partnership:** Protection against discrimination for individuals who are married or in a civil partnership.

5. **Pregnancy and Maternity:** Protection for women during pregnancy and maternity leave, including breastfeeding.
6. **Race:** Protection against discrimination based on race, colour, nationality, or ethnic or national origins.
7. **Religion or Belief:** Protection for individuals based on their religious beliefs or lack thereof.
8. **Sex:** Protection against discrimination based on a person's sex (male or female).
9. **Sexual Orientation:** Protection for individuals based on their sexual orientation, including heterosexual, homosexual and bisexual orientations.

## 6. Overview of Vulnerability

Vulnerability is not always permanent, it can be short term, long term or fluctuate over time. Vulnerability may arise from a wide range of factors including, but not limited to:

- Physical or mental health conditions.
- Learning disabilities or cognitive impairments.
- Age-related challenges.
- Language or communication barriers.
- Financial hardship or being in debt.
- Domestic abuse or safeguarding concerns.
- Bereavement, trauma or life events.
- Lack of digital access or literacy.
- Social isolation or lack of support networks.
- Social dynamics because of current socio-political.
- Lacking capacity, or believed to lack capacity, to make decisions.

There are various risk factors which may increase the likelihood of someone becoming vulnerable. These include, but are not limited, to:

- Individual factors, such as behavioral difficulties, learning difficulties, alcohol and substance misuse.
- Relationship factors, such as abuse, neglect, household substance misuse, household mental health.
- Community factors, such as low social integration, lack of recreational possibilities, and how communities change and interact over time. Social factors, such as employment status, discrimination based on a protected characteristic, difficulty accessing services.

The presence of these factors does not automatically make someone vulnerable. Protective factors, conditions or attributes that reduce risks and build resilience in individuals facing challenges, can make someone less likely to experience vulnerability.

Therefore, vulnerability is complex and will not be narrowly defined or treated as a defining label. Instead, vulnerability is an indicator of the need for greater support, awareness and intervention to ensure fair, inclusive and equitable service delivery.

## **7. Our Approach**

Our approach is to ensure every customer receives fair, respectful and accessible service, without unnecessary repetition or barriers. To achieve this, colleagues will embed inclusive practices into everyday service delivery.

We are committed to ensuring that no customer is disadvantaged or discriminated against based on any of these characteristics. We recognise that customers may have multiple protected characteristics and that these come together in ways that do not necessarily pre-determine experiences.

As vulnerability is complex, and as diverse needs are intersectional, we are committed to a dynamic approach that aims to understand the specific activities and interventions needed for an individual customer. We will recognise how individual circumstances can impact a customer's ability to access our services or sustain their tenancy.

Our normal service will offer reasonable adjustments, such as alternative forms of communication, flexible appointment times or adaptations to services. We will respond with empathy, fairness, and respect, adapting our approach to meeting individual needs and removing barriers wherever they exist.

We will continually improve our knowledge about the needs of our customers by:

- Routinely asking customers if they need any additional support.
- Regularly checking on vulnerability 'flags' and following up with customers to check on their wellbeing and needs, and if there are any changes to their circumstances.
- Proactively maintaining an awareness of social factors, both nationally and locally, that may impact on service needs and the risk of vulnerability and adapting our engagement with customers based on this.
- Regularly updating customer data during multiple interactions including about relevant protected characteristics, in line with our [Privacy policy](#)
- Avoiding stereotyping, generalising or assuming realities for customers based on any personal information held on file.

## **8. Accent's Key Principles**

To ensure that services are tailored in a fair and equitable way, we adopt and embed four key principles. These principles will also consider the household dynamics and needs of the customer.

1. **Inform us once:** As their needs change, customers should only have to provide the information once for their update to be assessed, recorded and validated for future consideration.
2. **Customer inclusion:** We will design services that are flexible enough to ensure that, with the relevant adaptations or adjustments, they are accessible for all. All service offerings will be created in line with our EDI, (Equality, Diversity and Inclusion), principles and will be considered from an impact perspective.
3. **Positive and proactive approach:** We will build an organisation-wide culture of awareness and proactive support for customers. This will include a proactive 'triaging' process. We will embed solution-focused practices across all teams with a clear focus on mitigating risks that could lead to customer harm. Where appropriate, we will work with external agencies to ensure customers receive the right support at the right time.
4. **Collaboration based on needs:** Where a customer has an appointed representative, guardian, carer and/or support person/s, we will work closely with these individuals to provide the appropriate service needed to meet the needs of the customer.

## 9. Reasonable Adjustments

### What is a reasonable adjustment?

- Using a 'triaged' approach in our tenancy management and enforcement service delivery, we will sensitively balance individual customer circumstances with an awareness of vulnerability risk factors to inform responses and actions.
- We will proactively ask customers if they require any specific services based on their individual needs.
- We will consider any additional needs and, where appropriate, vary our service delivery to ensure all our customers can receive equitable levels of service.
- We will help customers access any additional services they may require.
- Each service area will consider what additional support, consideration or variation in usual service provision is appropriate to meet customer need.
- Some examples of this variation are listed below:
  - Adjusting our repair response times.
  - Ensuring our contractors are aware of specific service adjustments, such as allowing extra time for a customer to open a door if they have mobility needs.
- Proactively offering and providing additional support for customers with communication barriers or learning disabilities.
  - Providing more regular checks where needed.



- Referring customers who have financial difficulties to our Inclusion Service and/or external agencies.
- Providing interpretation services and information in different languages, and ensuring customers know they can ask for this.
- Ensuring customer engagement opportunities are inclusive and flexible.

Any safeguarding concerns for adults or children at risk should be reported in line with our *Safeguarding Policy*.

## **10. Training**

We will take a continuous learning approach to training to ensure colleagues are aware and understand all evolving risk and need factors. Training will include specific focus on:

- Data protection.
- Trauma-informed responses (Trauma Informed Approach).
- Safeguarding protocols.
- Awareness of social dynamics and realities.
- Specific terminology that colleagues may encounter, and how best to respond.
- Signposting to relevant resources or services.

In certain circumstances, this approach may not be the complete solution. For example, if a customer has specific needs due to gender reassignment, they may not be necessarily vulnerable, but there is a risk that may lead to vulnerability.

In situations such as these, we will assess customer needs individually with guidance, support and additional learning as required provided by senior leadership, the people services team and line managers, with any appropriate expert advice from specific sources.

## **11. Monitoring**

We have set processes to regularly monitor and update customer data, responses to vulnerability flags, compliance with training and reasonable adjustments being offered.

We will shape monitoring with a continuous improvement approach influenced by customer feedback and customer needs.

## **12. Exceptions**

There may be certain circumstances under which the terms of this policy may be reconsidered. Colleagues should be mindful of customer vulnerabilities and their specific needs. We will assess extenuating circumstances on a case-by-case basis and apply exceptions that require empathy and flexibility, to ensure customers are treated fairly, compassionately and with respect.

At the agreed time for this policy to be reviewed, and as legislation and guidance changes, customers will be invited to feedback and influence future content to ensure co-creation continues.

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