Customer Inclusion and Support Policy

Accent Housing: Customer Inclusion and Support Policy

Customer Inclusion Policy v 1.0

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Customer Inclusion and Support Policy

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1.0	Board (11/02/2026)	04/11/2025	04/11/2027	New Policy	Jo Gallagher, Head of Customer and Community Engagement

Purpose:

The purpose of this policy is to outline our commitment to supporting customers with a wide range of needs, including those that may be complex or challenging. It also sets out how we will adjust our services and processes to ensure fairness, accessibility, and inclusion for everyone.

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1. Introduction

Accent is committed to understanding and responding to each customer's diverse needs with empathy, flexibility, and professionalism. We will ensure fair and accessible services, adapting our approach to meeting individual circumstances and prioritising support for those most at risk of harm or disadvantage.

This policy underpins our wider equity, diversity, and inclusion commitments by ensuring our teams are equipped to recognise individual needs, make reasonable adjustments, and work with external partners where specialist support is required.

Through this inclusive approach, we aim to build trust, enhance customer satisfaction, and experience, and ensure every customer is treated with dignity, respect, and fairness.

What this means for our customers

We will always treat our customers with dignity, respect, and fairness during every interaction with us. Customers will be made to feel included, listened to, supported, and valued. Any requests for support will be recorded, and we will make reasonable adjustments to our services to meet those needs. The information customers share with us will be stored securely, used appropriately.

2. Scope

This policy sets out our approach to:

- Recognising Protected Characteristics (see page 5).
- Defining vulnerability.
- Embedding key principles.
- Engaging with customers.
- Making reasonable adjustments.
- Training.
- Monitoring.

3. Definitions of protected characteristics and other vulnerabilities

We recognise customers may have diverse needs based on their protected characteristics, language requirements, or additional support requirements. We will reasonably adapt our services, accordingly, ensuring fair, inclusive, and accessible support and outcomes for all existing customers and, where possible, for the benefit of our future customers.

In line with our Equity, Diversity, and Inclusion Policy, we take an intersectional approach to understanding our customers' needs. This means recognising that a person's experiences and access to opportunities can be shaped by the combination of various aspects of their identity, such as gender, ethnicity, age, disability, or sexuality.

By understanding how these factors interact, we can adapt our processes and services to ensure fairness, inclusion, and equitable outcomes for all customers.

In addition to protected characteristics, customers' needs may also be shaped by a range of other factors, such as language requirements, vulnerabilities, or risks, such as a change in circumstances or a threat of harm.

Protected characteristics

Protected characteristics are specific attributes that are legally safeguarded against discrimination under the Equality Act 2010 in the UK. The Equality Act 2010 outlines nine protected characteristics to prevent discrimination in various settings including employment, education, and access to services. These include:

1. **Age** – Protection against discrimination based on a person's age or age group.
   Guidance: We will ensure our services are accessible and appropriate for customers of all ages, from young people to older residents, avoiding assumptions or age-related bias.
2. **Disability** – Protection for individuals with physical or mental impairments that have a substantial and long-term effect on their ability to carry out daily activities.
   Guidance: We will make reasonable adjustments to our homes, services, and communication methods to ensure equal access and opportunity for disabled customers.
3. **Gender Reassignment** – Protection for individuals who are undergoing, have undergone, or intend to undergo gender reassignment.
   Guidance: We will respect each customer's gender identity and preferred name or pronouns, ensuring our systems and interactions reflect their identity appropriately.
4. **Marriage and Civil Partnership** – Protection against discrimination for people who are married or in a civil partnership.
   Guidance: We will ensure our services and policies treat all relationships equally, without assumption or prejudice.
5. **Pregnancy and Maternity** – Protection for women during pregnancy and maternity leave, including breastfeeding.
   Guidance: We will provide flexibility and understanding to support customers during pregnancy, maternity, and early parenthood, ensuring their housing and service needs are met sensitively.
6. **Race** – Protection against discrimination based on race, colour, nationality, ethnic or national origins.
   Guidance: We will promote cultural awareness, challenge racism in all forms, and ensure our services are inclusive and accessible to all communities.
7. **Religion or Belief** – Protection for individuals based on their religious beliefs or lack thereof.

Guidance: We will respect and accommodate customers' beliefs, customs, and observances wherever reasonably possible, including consideration of dietary, prayer, and cultural needs.

8. **Sex** – Protection against discrimination based on a person's sex (male or female).
   Guidance: We will ensure that all services, communications, and opportunities are delivered equitably to all, regardless of sex or gender.
9. **Sexual Orientation** – Protection for individuals based on their sexual orientation, including heterosexual, homosexual, and bisexual orientations.
   Guidance: We will provide a safe and supportive environment for LGBTQ+ customers, ensuring that everyone feels respected, included, and free from discrimination or harassment.

Our approach is not to focus on these characteristics in isolation, but to ensure that our services do not create barriers or place customers at a disadvantage because of them. Some customers may choose not to share personal information about these characteristics, and we respect their privacy.
Instead, we focus on identifying where customers may experience barriers, risk of harm, or unequal access to services, for example:

- Experiencing harassment, discrimination, or anti-social behavior
- Difficulty understanding or accessing information
- Challenges accessing or maintaining their home
- Barriers to engaging with services or reporting concerns
- Situations where reasonable adjustments may be needed

Our role is to ensure that all customers feel safe, respected, and able to access our services without disadvantage. Staff are not expected to make assumptions about customers' personal circumstances, but to respond appropriately where needs or risks are identified.

We will ensure staff are supported through guidance and training, so they feel confident engaging with customers respectfully and inclusively.

We will never disadvantage or discriminate against any customer based on any protected characteristics. We also recognise that customers may have multiple characteristics or additional support needs that require a flexible and sensitive approach.

Other vulnerabilities

We have chosen to align how vulnerability is defined in line with the Housing Ombudsman's guidance, which states:

"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." Housing Ombudsman Service

Vulnerability may not always permanent. It can arise suddenly and unexpectedly, be short-term or long-term, or change over time. Individuals may experience vulnerability for many varied reasons, including:

- Physical or mental health conditions.
- Learning disabilities or cognitive impairments.
- Age-related challenges.
- Language or communication barriers.
- Financial hardship or debt.
- Domestic abuse or safeguarding concerns.
- Bereavement, trauma, or significant life events.
- Lack of digital access or digital literacy.
- Social isolation or limited support networks.
- Social pressures linked to current socio-political issues.
- Reduced or uncertain capacity to make decisions.

There are also broader factors that may contribute to vulnerability, such as:

Individual factors
These are personal circumstances that may increase vulnerability or create barriers to accessing services. These can include:

Health or cognitive conditions – such as learning disabilities, mental health conditions, or other long-term health needs that may affect how a customer accesses or manages their home and services.

Behavioural factors – including alcohol or substance misuse that may impact a customer's wellbeing, tenancy sustainment, or engagement with services.

Relationship factors
Experiences of abuse, neglect, domestic abuse, or household mental health concerns.

Community factors
Social isolation, exclusion, limited recreational opportunities, or changes within communities over time.

Social or economic factors
Unemployment, discrimination linked to a protected characteristic, or barriers in accessing essential services.

It is important to recognise that these factors do not automatically make someone vulnerable. Many people may face such challenges yet have personal strategies, support networks, or coping mechanisms that reduce risks and help them manage their situation effectively.

Safeguarding

We will consider safeguarding whenever we assess a customer's needs. Where a customer with care and support needs may be at risk of abuse and/or neglect, we will need to provide additional care and tailored support, even when our interaction is not related to the safeguarding issue. As a colleague, you should report any safeguarding concerns for adults or children at risk in line with our *Safeguarding Policy,* which can be found in our corporate library.

Personal pronouns

Respecting someone's personal pronoun is crucial for affirming their identity and creating a sense of belonging. By asking for pronouns, and using them correctly, we will value someone as an individual, building an inclusive environment that promotes trust and emotional safety.

4. References

- 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 (bringing together 116 pieces of separate legislation into a single framework for easier understanding and application and reinforce compliance.
- Mental capacity Act 2005
- *Accent Equity, Diversity, and Inclusion Policy
- *Accent Safeguarding Policy
- Accents Data Protection Policy and Privacy Notice

*Accent policies and procedures are available on request to customers. As a customer, you can request copies through our Housing Hub or through your Housing Partner when you speak with us. Some key customer policies are also available to view and download on our website, www.accentgroup.org.

5. Our approach

Our approach is to ensure every customer receives a fair, respectful, and accessible service, without having to make repeated requests or face any barriers. To achieve this, colleagues will embed inclusive practices into their everyday service delivery.

To ensure our services are tailored in a fair and equitable way, we adopt and embed four key principles.

- **Tell us once:** As customers' needs change, they should only have to provide the information once for their information to be securely recorded for future use, (with their explicit consent to record their information). This will ensure our customers feel heard and understood, and, with the right knowledge and support, colleagues will be able to anticipate the need for future interactions.

- **Customer inclusion:** We will design services that are flexible enough to ensure that, with any relevant adaptations or adjustments, they are accessible to everyone. All services will be created in line with our EDI (Equity, Diversity, and Inclusion) principles, and their impacts will be fully considered. For more information on our principles, please visit our website How we're prioritising equality, diversity and inclusion | Accent

- **Positive and proactive approach:** We will build an organisation-wide culture of awareness and enthusiastic 'can do' support for our customers. We will prioritise interactions which could potentially lead to customer harm. Where appropriate, we will work with our external and specialist partner agencies to ensure customers receive the right support at the right time.

- **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. If a customer asks how they may appoint a representative, we will explain the process and offer support to enable the set up as needed. Once a representative has been established, we will make the necessary checks to ensure the representative continues to have permission to speak on behalf or represent the customer.

- **Single Point of Contact (SPOC)** When needed, a Single Point of Contact (SPOC) may be assigned to ensure provision of consistent, tailored, and integrated support. This ensures smoother communication and reduces confusion for vulnerable customers, particularly where muti-disciplinary or multi-agency support is required.

By embedding this approach across all areas of our work, we aim to deliver services that are inclusive, compassionate, and responsive ensuring no customer is disadvantaged due to their circumstances.

6. Understanding our customers and their reasonable adjustments

- **Asking and listening:**
- Regularly asking customers if they require any specific services, support or adjustments to meet their individual needs.

- Regularly checking on vulnerability 'flags.'
- Regularly following up with customers to check on their wellbeing and needs, and if there are any changes to their circumstances.
- Regularly updating customer data during multiple and everyday interactions, including their relevant protected characteristics, in line with our Privacy Notice.
- **Awareness of changing environments:**
    - Staying aware of current social factors, both nationally and locally. For example, a change in entitlement to benefits that may impact service needs and cause vulnerability and adapting our engagement with customers accordingly.
- **Responding to individual needs:**
    - Assessing each customer's own situation and, where appropriate, varying our usual service delivery to ensure fairness and inclusivity for customers based on personal information we hold, rather than generalising, stereotyping or making our own assumptions.
- **Supporting access to services:**
    - Helping customers access any additional services they may need, whether internally or via external agencies.
- **Service area responsibility:**
    - Each service area will have responsibility for considering and agreeing what additional support, flexibility, or variation in standard processes is necessary to meet individual customer needs.

Examples of service adjustments include:

- Adjusting repair response times to accommodate customer circumstances.
- Informing contractors of specific adjustments, such as allowing extra time for a customer with mobility needs (e.g., using a wheelchair) to access their home.
- Providing proactive support for customers with communication barriers or learning disabilities, including alternative methods of contact, such as telephone instead of written communications.
- Offering more frequent or regular checks where needed.
- Referring customers experiencing financial difficulties to our Inclusion Service or appropriate external agencies.
- Providing interpretation services and information in different languages, ensuring customers know they can request this support.
- Ensuring all customer engagement opportunities are flexible and inclusive to encourage participation from everyone.

Through our approach, we will deliver services that are fair, accessible, and tailored to the individual circumstances of every customer.

7. Training

Accent is committed to ensuring all colleagues have the knowledge, skills, and awareness needed to recognise and respond effectively to customers' diverse needs. We will provide regular training on:

- Understanding vulnerability and protected characteristics.
- Equality, diversity and inclusion principles.
- Identifying and responding to individual customer needs with empathy and professionalism.
- Making reasonable adjustments and removing barriers to access.
- Safeguarding, data protection, and working with external support services.
- Awareness of social dynamics and realities, how individuals, groups and communities interact and change over time.
- Specific terminology colleagues may encounter, and how best to respond.
- Sign-posting customers to other relevant resources or services.

By equipping colleagues with this training, we ensure that our services are delivered fairly, consistently, and in a way that respects the dignity and individuality of every customer.

8. Monitoring

We will regularly monitor the implementation and effectiveness of this policy to ensure it meets the needs of our customers by:

- Collecting and analysing information on service accessibility, how we are meeting reasonable adjustments and in what volume, and the support we are providing to customers with diverse needs.
- Reviewing feedback from customers and colleagues to identify areas for improvement.
- Assessing whether this policy is achieving its objectives of fairness, inclusion and equity in service delivery.
- Updating the policy and associated practices as required to reflect changes in legislation, customer needs or organisational priorities.

This monitoring ensures continuous improvement and accountability, and that our services remain inclusive, responsive, and aligned with our commitments to equity, diversity, and inclusion.

9. Exceptions

There may be circumstances in which the application of this policy requires reconsideration. In such cases, we will assess each situation on an individual basis, applying empathy, flexibility, and professional judgement to ensure customers are treated fairly, compassionately, and with respect.

When the policy is due for review, and as relevant legislation or guidance changes, we will invite customers to provide feedback and contribute to the policy's development.

This ensures this policy continues to be co-created and reflects the needs and experiences of the people we serve.

10. Privacy and GDPR compliance

All personal and sensitive personal information (for example, relating to protected characteristics, health conditions, or safeguarding), we collect is handled in strict accordance with GDPR regulations and in accordance with the Accent Group Data Protection Policy and Standards.

We will limit the information collected to what is necessary for providing adequate support, ensure transparency with the customer about how their data will be used, and offer the right for customers to withdraw their consent to use their information at any time. Please refer to our Privacy Notice for more information about this. If you are reading, or have requested a hard copy of this policy, you can find our privacy statement on our website, www.accentgroup.org

We are happy to provide this information in alternative formats (including large print, audio, Easy Read, and language translated versions). Please request any other format you prefer through our Housing Hub when you contact us.