

Contents

1	Aims	1
2	Scope	1
3	Policy Statement	1
	3.1 Equality Act 2010	1
	3.2 Definition of Vulnerability	2
	3.3 Our Approach	2
4	Monitoring and Delivery	3
5	Legislation and Regulation	3
6	Related Policies and Procedures	3
7	Glossary	4
8	Document Control	4
Αp	pendices	5
Α	Appendix 1	6

1 Aims

- 1. In providing its services as a landlord, managing agent, support provider, contractor, partner and purchaser Jigsaw Homes Group recognises its responsibilities to ensure that customers are not unfairly disadvantaged by their individual circumstances.
- 2. This policy sets out the common principles that underlie how Jigsaw Homes Group will assess the need for, and make, appropriate adjustments to its service delivery to assist customers with vulnerabilities.

2 Scope

3. The policy applies to all customers of the Jigsaw Homes Group and its subsidiaries.

3 Policy Statement

4. This policy sets out how Jigsaw Homes Group will help identify and adapt its services to ensure that service adjustments are made for residents, their carers or advocates, visitors to our premises and its suppliers.

3.1. Equality Act 2010

- 5. The Equality Act 2010 sets out the following protected characteristics;
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation.
- 6. The Act also places a duty on the Group to make service adjustments. This duty can be categorised into three areas:
 - Alterations to our practices, policies and procedures.
 - · Providing additional aids and services.
 - Overcoming a physical feature which is a barrier to access by altering or removing the feature, or providing a service by an alternative method.

3.2. Definition of Vulnerability

- 7. Given that each person's circumstances are unique to them there is no standard definition of vulnerability within the social housing sector.
- 8. In 2023, the Housing Ombudsman Service indicated that vulnerability should be considered as a characteristic that a resident possesses, either permanently or temporarily, that may mean they need care or support to complete landlord-tenant transactions. These characteristics may also mean that service adjustments are appropriate to actively prevent harm or distress.

3.3. Our Approach

9. We may make service adjustments not covered by the Equality Act but this policy also recognises that protected characteristics may overlap with vulnerabilities, compounding the needs of residents, their carers or advocates, visitors to our premises or suppliers.

Identifying Customers with Vulnerabilities

- 10. The Group seeks to record additional needs or vulnerabilities on a transactional basis. In doing so, staff are guided by the following principles;
 - Ask, don't assume Additional needs or vulnerabilities may not necessarily be visible or obvious.
 - Listen People with additional needs or vulnerabilities are likely to know what works for them best.
 - Individuality There is not a uniform response to a particular vulnerability, the service adjustment should be tailored to the individual.

Assessing Service Adjustment

- 11. In assessing service adjustments there may be consistent service adjustments which could be applied to residents in a similar circumstances, for example, someone with limited mobility afforded extra time to open their door. However, there will be circumstances that are unique to an individual and in these cases service managers will be responsible for identifying and implementing the adjustment.
- 12. When determining a service adjustment Jigsaw Homes Group will, where appropriate, consider the following;
 - the views of the individual who we are considering making the adjustment for,
 - in the case of a resident, the suitability of their current home,
 - the effectiveness of any adjustment,

- the practicability of the adjustment,
- the financial and other costs of any adjustment,
- the availability of financial or other assistance,
- the extent of disruption caused to both the individual and the business in adopting the adjustment,
- the extent of our financial and other resources, and the amount of resources already spent on adjustments.
- 13. It is not possible to provide an exhaustive list of service adjustments since an adjustment is based on a customer's individual circumstances. Appendix 1 sets out examples where we have applied service adjustments within the business.

4 Monitoring and Delivery

- 14. Given the consumer regulation requirements placed upon the Group from 1 April 2024 the policy will be reviewed a minimum of once every year, unless changes in statute, contract, or regulatory code and guidance require otherwise.
- 15. All employees will be responsible for maintaining and continually improving fairness and equality of access for customers, staff and partners according to the person's needs regardless of who they are. Learning from complaints handling will be reported back to the Executive Management Team.
- 16. The Group will review the type and frequency of service adjustments made to understand the future potential needs and aspirations of customers. This knowledge will be used to assist in developing future service delivery.

5 Legislation and Regulation

- 17. The Equality Act 2010
- 18. Social Housing (Regulation) Act 2023
- 19. Housing Ombudsman Complaint Handling Code

6 Related Policies and Procedures

- 20. Asset Management Strategy
- 21. Complaints Policy
- 22. Customer Contact Strategy
- 23. Equality and Diversity Policy
- 24. Independent Living Strategy

- 25. Aids & Adaptations Policy
- 26. Allocations Policy
- 27. Anti-Social Behaviour Policy
- 28. Current Rent & Service Charge Collection Policy
- 29. Tenancy Policy

7 Glossary

30. None

8 Document Control

Responsible Officer/s:	Mike Murphy - Operations Director Governance and Regulation
Date of Approval:	
Approved by:	
To be Reviewed Every:	[annually]

Appendices

A Appendix 1

- A.1. Examples of service adjustments are below:
- A.2. Agreeing a specific day and time of the week to contact a neurodiverse tenant to assist them in resolving a query with their personal independence payment entitlement.
- A.3. An applicant who struggled to use the Choice Based Lettings system due to low literacy, and had no other support network, received a weekly call to identify any properties they wished to bid for.
- A.4. Our Allocations Policy allows flexibility with regards to age criteria for over 55's accommodation where there is a medical need for this type of accommodation.
- A.5. A tenant who had limited mobility had a flag placed on their tenancy record stating "allow extra time to answer the door". This alert shows on the electronic device for any operative calling to their home to complete a repair.
- A.6. As part of investigating a noise nuisance complaint regarding everyday living noises, such as traffic, it was established that the tenant had a previously undiagnosed health condition which amplified sounds to an uncomfortable and unbearably level. In response we liaised with health professionals and agreed coping strategies such as listening to calming music through headphones.
- A.7. Where a physical or mental health condition prevents a tenant from maintaining their garden, and their garden has become overgrown, an assessment of their ability to arrange for the garden to be cleared is undertaken. In the event the tenant does not have the support network, financial means or capacity to arrange this then a one-off clearance is undertaken to return the garden to a manageable state.
- A.8. A tenant with a severe respiratory condition reported condensation issues at her home. They lived alone at the property and were reluctant to open a bedroom window for fear that it may entice an opportunist burglar. In response we installed an opening restrictor on the bedroom window to allay these fears.
- A.9. At our offices visitors can access translation services and there are wheelchair accessible interview rooms with hearing loop devices.
- A.10. Home User Guides explaining how the features of new properties work have been made available in a video format to assist tenants when they first move into their new home.
- A.11. A tenant with severe anxiety and insomnia, who only slept during the day, notified us that they were unable to cope with the several weeks of noise associated with major planned works at the building. Arrangements were made for the tenant to be temporarily decanted to another property for the duration of the works.



Creating homes. Building lives.

Jigsaw Homes Group Ltd.

Cavendish 249 Cavendish Street Ashton-under-Lyne OL6 7AT

https://www.jigsawhomes.org.uk 0300 111 1133 info@jigsawhomes.org.uk

Regulated by the Regulator of Social Housing Registration No. LH 4345 $\,$

Registered under the Co-operative and Community Benefit Societies Act 2014 Registration No. 29433R