Help to Access our Services Policy

Policy Owner	Paul Seymour, Executive Director of Customers and Communities
Approval Level	Customer Experience Committee
Resident Input	Joint Residents Group, August 2026
Policy Review Due	November 2028
EIA Date	August 2026
Linked strategies/policies	This Policy applies to the delivery of all our services to residents, including our Complaints Policy.
Version	1
Date of Approval	September 2026
We want everyone to be able to access and understand this policy. If you need this information in another language or format, such as large print, audio, Braille or Easy Read, please contact us and we will support you.	

Contents

1. What this policy is for 3
2. Who this policy applies to 4
Our definitions of 'vulnerability' 4
3. Regulation and Legal Requirements 6
4. What we will do 7
Priority Services Register for heat network customers 7
Identifying vulnerabilities 7
Making reasonable adjustments 8
Reviewing decisions 10
Recording and monitoring customer data 10
5. Equality, Diversity and Inclusion 11
6. Who is responsible 12
7. Monitoring and Reporting 12
8. Glossary 12

1. What this policy is for

1.1 The purpose of this policy is to help residents experiencing vulnerabilities to access our services. It also sets out Southway Wythenshawe Homes's commitment to making reasonable adjustments to ensure residents with disabilities have fair access to services.

1.2 We aim to foster a culture where colleagues feel empowered to respond confidently and sensitively to the diverse needs of residents. Some examples of how we can help residents access our services are described in section 4.11 of this document. If you would like to discuss how we can adapt our services to meet your individual needs, please contact us.

1.3 This policy sets out how we define individual needs and how we respond to them, including:

- Specific support for heat network customers
- How we respond to requests for a reasonable adjustment
- How we consider additional needs not covered by legislation in line with best practice
- The support residents can expect from us

1.4 This policy centres on residents who may be experiencing vulnerabilities, using the definition in Section 2, but can make their own decisions. If a resident is unable to make a particular decision for themself (also known as lacking the mental capacity), we will work with their chosen representative, attorney, or deputy appointed by the Court of Protection.

1.5 This policy outlines the commitments Southway Wythenshawe Homes has for maintaining inclusivity and fairness when delivering services to residents. Residents are at the heart of all we do as an organisation. We will continue to talk to, co-create and engage with them to make sure our policies and processes reflect their needs.

2. Who this policy applies to

2.1 This policy applies to all Southway Wythenshawe Homes customers and residents. We recognise that people may experience vulnerability at different points in their lives and that their circumstances and support needs may change over time. Our approach is to understand each person's individual circumstances, identify any support or reasonable adjustments needed, and avoid applying fixed labels.

2.2 We also recognise that the term 'vulnerable' has specific meanings in law, regulation and guidance. Where we use this term, we do so to provide clarity for residents and colleagues, and to align with the Housing Ombudsman Service, Ofgem and relevant legal definitions.

2.3 We will respect residents' wishes about how their individual needs and any vulnerabilities are recorded and responded to, recognising that personal circumstances and required reasonable adjustments may change over time.

Our definitions of 'vulnerability'

2.4 The table below summarises the key definitions and principles used in this policy:

	Definition or consideration
Housing Ombudsman Service definition	We recognise that vulnerability can be experienced by any resident at any time. Vulnerability arises when an issue disproportionately impacts a resident due to their personal circumstances or characteristics, whether protected or unprotected.
Ofgem definition	Any customer who identifies themselves, or a permanent resident of their home, as being significantly less able than a typical consumer of energy to protect or represent their interests in the energy market, and/or significantly more likely than a typical consumer to suffer detriment, or where that detriment is likely to be more substantial.

Protected characteristics	The Equality Act 2010 lists the following protected characteristics: age; gender reassignment; marriage or civil partnership; pregnancy or maternity; disability; race and ethnicity; religion or belief; sex; and sexual orientation.
Listening to you and respecting your needs	We recognise that not every individual who is protected by the Equality Act (2010) has additional needs related to housing or energy. We also understand our residents may not identify with being 'vulnerable' but may have additional needs. These needs may vary over time and may have no bearing on a resident's ability to sustain their tenancy or ask for a service.
Recognising that circumstances and support needs change over time	Vulnerability is not static or fixed; a person can become vulnerable at any time. A person can become vulnerable because of their characteristics, circumstances or the market, all of which can change. Some people may become vulnerable for a period of time due to their changing circumstances.
Legal definitions	The term 'vulnerable' can also be used in a specific, legal context. For example, the term 'vulnerable' in legal homeless guidance has a precise and technical meaning that is not adopted here. The definition here applies to all general housing management policy. Any technical definition set out in any other policy, for example safeguarding, will replace the definition set out here.

2.5 We will consider vulnerabilities in line with this Policy to ensure we understand residents' needs. Examples of vulnerability could include:

Resident circumstances	Examples and indicators

Disabilities and long-term health conditions	The way we deliver a service (or how we resolve an issue) may not meet your individual needs because of a disability or health condition, such as dyslexia, sight loss, autism, ADHD, or chronic pain.
Financial circumstances or financial exploitation	Low income, severe financial insecurity, debt issues, or illegal money lending.
Housing issues	Housing costs, property condition, lack of heating, or lack of hot water.
Heat consumption	High or low heat consumption, which may indicate fuel poverty, additional service needs, or medical needs.
Personal circumstances	Experience of homelessness, domestic abuse, alcohol or drug dependency, bereavement, digital exclusion, or a short-term health issue.
Communication needs	Language needs, accessible information needs, or other support needed to understand or engage with services.
Other relevant circumstances	Carer status, armed forces status, or wider socio-economic circumstances.

3. Regulation and Legal Requirements

3.1 This policy incorporates several legislative and regulatory requirements, including but not limited to:

- Equality Act 2010
- UK General Data Protection Regulation (UK GDPR) / Data Protection Act 2018
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- The Human Rights Act 1998
- Domestic Abuse Act 2021

- Ofgem regulations for heat network providers

3.2 We have also referred to requirements outlined in key regulation, including but not limited to:

- The Regulator of Social Housing's Transparency, Influence and Accountability Standard requires landlords to consider the diverse needs of their residents.
- The Housing Ombudsman Complaints Handling Code 2024 states that landlords must consider whether a resident is vulnerable or at risk when responding to complaints.

4. What we will do

Priority Services Register for heat network customers

4.1 For customers on our heat networks, this will be recorded on our Priority Services Register (PSR). Heat network customers will receive additional information on how to sign up to the PSR, including the extra support available to them.

Identifying vulnerabilities

4.2 A resident's vulnerability may be identified by:

- The resident or their representative contacting us for extra support
- Any colleague who is in contact with the resident
- A referral from an external agency/organisation

4.3 There are several touchpoints where we may confirm details of a resident's vulnerability or seek to confirm information we already hold about them. Examples of touchpoints where residents may be asked for information about a vulnerability or support need include:

- Tenancy application and sign-up
- Home visits

- Heat network Priority Services Register
- Conversations with our Customer Hub
- Financial Inclusion conversations

4.4 If you identify as having a vulnerability, we will provide extra support to make sure you are not disadvantaged. In specific circumstances, we will ask for evidence of any additional needs, usually in the context of lettings, where a transfer is needed on medical grounds or where a service adjustment is likely to be particularly costly. Where we provide support for tenancy sustainment, for example support with a Universal Credit or housing benefit application, we may also ask the resident to give us relevant information.

4.5 We recognise the important role that advocates and representatives can play in supporting residents who are vulnerable to make sure they receive a good service. With the resident's explicit consent, we will correspond with a family member or third party on their behalf.

4.6 We will not share any personal data with advocates or third parties if consent is not freely given, except where there are specific safeguarding concerns, as outlined in Southway Wythenshawe Homes's policies.

Making reasonable adjustments

4.7 Residents can ask for a reasonable adjustment from any colleague. We will take into consideration a resident's needs and circumstances, to help them live well and carry out their tenancy.

4.8 A reasonable adjustment is a change to how we deliver a service or a physical change to a property to make sure a resident is not disadvantaged. When considering whether a request is reasonable, we will consider:

- Effectiveness: the adjustment should fully address the resident's need
- Practicality: we must be able to make the adjustment in practice
- Resources: how much time the adjustment will take and any related costs

4.9 We will review recorded support needs and reasonable adjustments periodically and when we become aware of a significant change in circumstances.

4.10 Colleagues can assess the reasonableness of your request for a reasonable adjustment. If the colleague's response, or lack of one, does not meet your need, you can raise the matter through our Customer Hub and a manager will review the response you have been given.

4.11 Examples of reasonable adjustments could include:

Type of adjustment	Examples
Property adaptations	Providing equipment and adaptations to a property, based on the resident's assessed needs.
Communication support	Providing documents and letters in different accessible formats, such as Braille, large print or translation into other languages; explaining the content of a letter by telephone; or arranging an in-person visit to explain matters. We may be able to offer a named contact for some services.
Advocacy support	If you need someone to communicate with us on your behalf or join you in meetings, but do not have someone who is able to fulfil this role, we may be able to support you in finding an advocate.
Access and visit arrangements	Allowing longer for a resident to answer the door; arranging a joint visit with a support worker or representative; offering hearing loops in our offices; or arranging visits from female colleagues or in pairs where appropriate.
Home visits	For some services we may be able to offer home visits.
Repairs and service response	Considering whether a repair should be completed sooner than its scheduled target date where a vulnerable household member

	may be adversely affected by a delay, and ensuring relevant vulnerability information is recorded when the repair is booked.
Damp and mould response	Escalating the remedial process where damp and mould are reported and a member of the household is vulnerable.

4.12 We will provide colleagues with guidance and training to help them identify individual needs, make reasonable adjustments and deliver services consistently.

Reviewing decisions

4.13 If you do not receive a response to your request for help to access our services or you are not satisfied with our response, you can challenge us by raising a complaint. We will acknowledge your complaint within 5 working days. Your case will be referred to a manager who has not been involved in the decision-making so far, and you will receive a full response.

4.14 If you remain dissatisfied after we have provided our stage 2 final response, you can raise the matter with the Housing Ombudsman for an independent review.

Recording and monitoring customer data

4.15 We regularly ask residents if there is any information that they wish to share with us, while also using our professional curiosity to proactively identify possible needs.

4.16 We rely on residents to keep us informed about any changes to their personal and/or household circumstances. We may carry out audits and review our records from time to time and/or once we are alerted to a change in circumstances. Residents do not have to share this information; however, by providing it they are helping us to tailor our services.

4.17 We share this information with our colleagues and contractors where needed and in keeping with our Data Protection Policy, to provide instructions on

how to tailor the service; for example, by explaining that the resident may need more time to answer the door.

4.18 Where a resident gives us information, it will be used to inform how we deliver our services. This information is recorded on their individual account and reviewed ahead of relevant interactions.

4.19 For heat network customers, it will also be stored on our Priority Services Register to ensure we can reduce the impact of any temporary loss of heat or hot water for heat network customers who are vulnerable.

4.20 We always collect information about customers who are vulnerable lawfully and fairly, store it securely and make sure it is only kept for as long as it is needed. We explain how we do this in our Data Protection Policy and privacy notice, which can be found on our websites.

5. Equality, Diversity and Inclusion

5.1 An Equality Impact Assessment (EIA) was completed on 31 July 2026. The actions from this are:

Policy Change
Information about available formats is now highlighted on the front page of the Policy, making it easier for residents to identify how they can access information in a format that meets their needs.
Updated our approach to individual needs and vulnerabilities to reflect Housing Ombudsman Service best practice on language, tone and person-centred communication. This is reflected in Sections 1 and 2.
Made explicit reference to our commitment to providing colleague guidance and additional training to help them identify individual needs, make reasonable adjustments and deliver services consistently. This is reflected in Section 4.
Introduced specific information about how we will monitor and report the delivery of this Policy in Section 7.

6. Who is responsible

6.1 The person responsible for overseeing this policy is listed below.

Officer	Responsibility
Executive Director of Customers and Communities	Owner

7. Monitoring and Reporting

7.1 The Help to Access our Services Policy will be reviewed by the Customer Experience Committee every three years. The Board will receive an annual update on how the policy is being delivered. This will include reviewing reports on:

- complaints involving individual needs or vulnerabilities;
- accessibility and communication feedback;
- equality and customer insight data where lawfully collected;

7.2 The next review date for this policy is shown on the cover sheet.

8. Glossary

Accessible Information	Information provided in a format that meets a resident's communication needs, such as large print, Braille, translation or other alternative formats.
Additional needs or individual needs/circumstances	Any requirement for us to change the way we do things to help a resident access our services. An example of an additional need could be sending a letter in large print. Another example is using an interpreter for a conversation with a resident whose first language is not English.
Advocate	An individual or organisation that supports a resident to express their views, understand information and communicate with service providers.
Consent	A resident's clear agreement for information to be shared or for someone else to act on their behalf.

Heat Network	A communal heating system that supplies heating, cooling or hot water to more than one property in a building, or to more than one building from a central source. Examples of networks that are excluded from this regulation include: • Houses of multiple occupation (HMOs) where heating is supplied through a shared heating system of single-dwelling capacity • Conversions of existing buildings where a property is divided to create multiple dwellings within a shared building, that have one energy source with a capacity of no more than 45kWth
Mental Capacity	The ability to make a particular decision for yourself. Under the Mental Capacity Act 2005, a person may be assessed as lacking mental capacity to make a specific decision if they cannot understand, remember, use or weigh up the relevant information, or communicate their decision. Note: A person should not be assumed to lack mental capacity simply because they make a decision that others consider unwise.
Personal Data	Information relating to an identified or identifiable individual which is handled in accordance with data protection legislation.
Priority Services Register (PSR)	A register used to identify heat network customers who may need additional support if there is a loss of heating or hot water services.
Protected characteristics	The characteristics protected by the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
Reasonable adjustment	A change to the way we provide a service, communicate or carry out our work to remove barriers for a resident and better meet their individual need.
Representative	A person authorised by a resident to act or communicate on their behalf. This may include a family member, advocate, support worker or other trusted individual.
Tenancy Sustainment	Support provided to help residents successfully maintain their tenancy and remain in their home.
Vulnerability	A situation where a person's circumstances, characteristics or experiences mean they may need additional support to access services or avoid disadvantage.