



Bristol City Council Housing and Landlord Services

Resident Vulnerability and Reasonable Adjustments Policy

Version 1.1

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Date approved: 14/01/2026

Date for Review: 3 years

Service Area: Housing and Landlord Services

Classification: Operational

History of most recent policy changes			
Date	Page	Change	Origin of change (e.g. legislation)
09/09/2026		New template and title	

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Definitions

Care experienced	Someone who has spent time in care, such as foster care, residential care, or being looked after by a local authority.
Carer	A person who provides unpaid support to a family member, partner, friend, or other person who could not manage without that help.
Council resident	Includes Council tenants, leaseholders, shared owners, prospective tenants, and anyone living in a Council home.
Data protection	Rules that help make sure personal information is collected, stored, used, and shared safely and lawfully.
Digital exclusion	When someone finds it difficult or impossible to access online services because they do not have the equipment, internet access, skills, or confidence to use technology.
Disability	Bristol City Council uses the Social Model of Disability which means that people are Disabled by barriers in society such as lack of physical access and communication and not by any impairment. Impairments are specific to individuals and can include mental health conditions, a physical or sensory impairment, learning difficulties, neurodivergence, or long-term health conditions.
Domestic abuse	Any form of abusive behaviour between people who are or have been personally connected, including physical, emotional, psychological, financial abuse, or controlling behaviour.
Public Sector Equality Duty [PSED]	A legal duty under the Equality Act 2010 that requires public bodies, such as Bristol City Council, to think about how their decisions and services affect people with different protected characteristics. This duty requires the Council to: • Eliminate discrimination, harassment, and victimisation. • Advance equality of opportunity between different groups of people. • Foster good relations between people from different backgrounds and communities. This means the Council must consider residents' different needs when delivering housing services and take appropriate steps, such as making reasonable adjustments where appropriate, to ensure services are fair and accessible to everyone.
Protected characteristics	These are characteristics that are legally protected under the Equality Act 2010. The list includes age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
Reasonable adjustment	A change to the way a service is delivered to help remove barriers that make it harder for a resident to access or receive the service.
Resident vulnerability	A situation, characteristic, or circumstance that makes it more difficult for someone to access or receive landlord or housing-related services. Vulnerability can be temporary or long-term.
Safeguarding	Actions taken to protect children and adults who may be at risk of abuse, neglect, exploitation, or harm.
Subject Access Request	A request made to the Council to find out what personal information it holds and how it is being used.
Support agency	An organisation that provides advice, assistance, care, advocacy, or support to residents who may need additional help.

1. Purpose

Bristol City Council's Housing and Landlord Services strives to treat all residents fairly, respectfully and with sensitivity when delivering services. This policy sets out how colleagues support residents who may have temporary or long-term needs to access housing-related services.

Specifically, it aims to assist and inform our staff and contractors how to collect and handle resident information in a clear and responsible way. It also seeks to help inform good decision making by:

- Explaining what it means for someone to be vulnerable.
- Showing how the Equality Act 2010 applies to the delivery of housing and landlord services
- Giving clear guidance on handling resident information.

2. Scope

This policy concerns the treatment of Bristol City Council residents in the delivery of Housing and Landlord Services. The term 'resident' for the purposes of this policy includes tenants, prospective tenants, shared owners, leaseholders and/or any other individual who resides in a tenanted Council home.

It refers to all Council homes owned, maintained, and managed by Bristol City Council as a Registered Provider of Social Housing.

3. Aims and Objectives

The main aims of this policy are to:

- Centrally record, and make effective use of, resident information so we can better understand the different needs of our residents to improve accessibility, communication, and ensure compliance with the requirements of GDPR.
- Take positive action by making reasonable adjustments to ensure residents' needs are met and their homes are safe.
- Support colleagues and those working on our behalf to better understand resident vulnerability and
- Meet our legal duties through effective knowledge and information management.

4. Roles and Responsibilities and Authority

As the Information Asset Owner [IAO], the Director of Housing and Landlord Services is responsible for the processing of resident data within Housing and Landlord Services.

The Head of Housing Management is the Lead Information Custodian for resident data and is responsible for defining the standards and quality of data management and use.

The Director of Housing and Landlord Services and the Head of Housing Management are responsible for the implementation of this Policy and for ensuring that all Housing and Landlord Services staff are trained on the requirements of the Equality Act 2010.

All Bristol City Council Housing and Landlord Services colleagues are responsible for delivering this policy.

A full list of relevant roles and responsibilities is in Appendix A.

5. The Policy

5.1 Legal Context and Consumer Standards

This Policy supports Bristol City Council to meet its Public Sector Equality Duty under the Equality Act 2010 to:

- 1) Eliminate discrimination, harassment, victimisation and any other prohibited conduct.
- 2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not.
- 3) Foster good relations between persons who share a relevant protected characteristic and persons who do not.

Under the Regulator of Social Housing's Transparency, Influence and Accountability Consumer Standard, Bristol City Council must:

- Consider the diverse needs of tenants across all landlord services and housing.
- Understand the barriers different groups of tenants might face in accessing services and work to remove those barriers.

The Housing Ombudsman requires compliance with the Equality Act 2010 through implementation of policies, procedures or processes which accommodate individuals' needs.

A list of further statutory authorities relevant to this Policy are in Appendix B.

5.2 Tenants Rights

Relevant to this policy, all Council residents have the right to expect their landlord to act within the requirements of the Equality Act 2010, Care Act 2014, and Human Rights Act 1998.

5.3 Recognising Resident Vulnerability

All staff or those acting on behalf of the Housing Directorate are trained to be able to identify potential vulnerabilities and to respond to these sensitively, in accordance with clearly defined processes.

5.3.1 Definition

Vulnerability can mean different things in different situations and can change over time. Bristol City Council understands that some residents may not wish to be considered vulnerable because it can be viewed negatively by some people.

For Housing and Landlord Services, a resident may be defined as vulnerable if something in their life makes it more difficult for them to manage tenancy related tasks, such as filling out forms or contacting their landlord.

A resident might be considered vulnerable when their needs aren't being met. It can be temporary, such as when experiencing grief, or long-term, such as living with a chronic or progressive health condition.

5.3.2 Protected Characteristics

As a local authority landlord, Bristol City Council must have due regard to the protected characteristics set out in the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

We recognise that simply having a 'protected characteristic', such as being older, does not automatically make somebody vulnerable. BCC Housing and Landlord Services will not make assumptions based solely on a resident's protected characteristic.

5.3.3 Disability

The Equality Act 2010 defines a Disabled person as somebody who has a physical or mental impairment which has a long-term adverse effect on their ability to carry out day-to-day activities.

Bristol City Council uses the 'Social Model of Disability' which recognises the right to self-identify as a Disabled person and that people are disabled by the barriers in society, such as lack of physical access, not by their impairment.

The statutory definition for each protected characteristic can be found in Appendix B.

5.3.4 Circumstantial Characteristics

There are other characteristics or life experiences which do not fall under the remit of the Equality Act 2010, but which may have an adverse impact upon a resident's ability to access Housing and Landlord Services. Examples of circumstances include, but are not limited to:

- Care experienced (treated as a Local Protected Characteristic).
- Bereavement.
- Fuel poverty.
- Carer.
- Digital exclusion.
- Domestic abuse.
- Experience of housing instability or homelessness.

Bristol City Council recognises its role in relation to residents' access to services and that failure to meet additional needs disadvantages the resident and can further exacerbate their experience of vulnerability.

When determining resident vulnerability, Housing and Landlord Service will always consider the entire resident household and the cumulative effects of characteristics and circumstances.

5.4 Responding to Resident Vulnerability

Bristol City Council is committed to taking positive action to respond to any particular need that might reasonably arise from a resident's characteristic or circumstance that adversely impacts their ability to access Housing and Landlord Services.

It is accepted that not everyone's experiences of a protected characteristic are the same nor that a protected characteristic will always give rise to the same particular needs.

Where staff find barriers which prevent residents from accessing services, they will take reasonable steps to consider what person-centred solutions should be offered to assist that individual.

Bristol City Council Housing and Landlord Services understands that treating everyone equally does not always mean treating everyone the same.

People with different needs may need different types of support. By taking positive steps to meet these needs, especially those linked to protected characteristics, the council helps make sure everyone has fair opportunity to access services.

5.4.1 Reasonable Adjustments

5.4.1.1 Definition

A reasonable adjustment involves making a change to how a service is provided to, as far as practicable, remove any disadvantage experienced by a resident who has a protected characteristic or other vulnerability factor.

Reasonable adjustments might also require taking alternative measures to achieve the same desired outcome. For example, some services may not be offered where there is an evidenced safeguarding risk.

BCC Housing and Landlord Services may seek opportunities to work with other agencies to make reasonable adjustments by making referrals to relevant, or link in with existing, support.

A non-exhaustive list of reasonable adjustments is in Appendix D.

5.4.1.2 Requesting Reasonable Adjustments

When interacting with Housing and Landlord Services, for example when requesting a service, residents can ask for reasonable adjustments based on their needs or situation, whether temporary or long-term. Residents can also ask that someone makes this request on their behalf. BCC Housing and Landlord Services needs to be able to make the adjustments and not at the expense of other residents, which means requests must be reasonable.

Examples of reasonable adjustments include:

- Allowing extra time to answer the door.
- Choosing a preferred method of communication (e.g. text, email, phone, letter).

Otherwise, Housing and Landlord Services will take steps to anticipate reasonable adjustments based on previous requests from the resident or other information held about the resident household. For example, residents who need a lift to access their home will be offered support before and for the duration of lift maintenance repair works.

Residents can refuse reasonable adjustments; however, this will not stop Housing and Landlord Services offering and recording this interaction in accordance with the Public Sector Equality Duty.

Reasonable adjustments are not to be made by the resident to assist the landlord.

5.5 Recording Resident Vulnerability

In order to meet statutory obligations, BCC Housing and Landlord Services must hold quality information about our homes and who is living in them.

5.5.1 How We Collect Data

Information about resident vulnerability is usually gathered from when an application for housing is made and at regular points during the tenancy. A non-exhaustive list is as follows:

- Council interaction with the resident either in person, by telephone, or through digital communication. This includes contractors who attend residents' homes to carry out works.
- Operational data or other data collection activities (e.g. Tenancy Audit, Repair Request).
- Third party information, for example referrals from support agencies.

Housing and Landlord Services encourages all colleagues to engage in 'active listening' when interacting with residents so that they can identify changes in resident circumstances.

5.5.2 How We Store Data

Bristol City Council Housing and Landlord Services stores resident vulnerability information centrally on the Housing Management System.

Resident information is recorded in this way to:

- Ensure that decisions are made, and actions taken, based on good quality, up-to-date information.
- Avoid making reactive reasonable adjustments which may delay service delivery.
- Protect the resident from needing to repeat their personal information each time they interact with the Council which may cause inconvenience and/or distress.

Housing and Landlord Services staff and those working on our behalf shall only use accepted language and not opinions to record resident information to ensure consistent and fair treatment.

Because information about resident vulnerability is sensitive, it has extra legal protection. Housing and Landlord Services follow clear rules and processes to make sure this information is handled safely and lawfully.

Housing and Landlord Services will not record the specific nature of the resident household's health conditions unless explicitly requested by the resident or required for legitimate business purposes, such as in a Care Act assessment.

Bristol City Council will share information with third parties where appropriate in accordance with approved procedures.

5.4 Complaints

Residents can request information about how their information is used by Bristol City Council Housing and Landlord Services by submitting a Subject Access Request.

Residents are encouraged to make a complaint if they are unhappy with how the Council has handled their information and can expect their complaint to be responded to in accordance with this policy.

6. Quality Assurance

This policy will be published on the Bristol City Council Website and communicated to relevant operational teams via policy briefings and other appropriate communications.

The policy will be reviewed by the Policy and Practice team in 3 years in accordance with our procedures.

BCC monitor satisfaction, using data and insight from, as a minimum reporting in relation to Complaints and Tenant Satisfaction Measures.

Decisions and related actions taken in accordance with this policy will be recorded in the Housing Management System for performance monitoring.

Appendices

Appendix A – Roles and Responsibilities

Job/Team Name	Description of responsibilities
Head of Service	- Consider the best strategies for implementing this policy at a service level. - Consider resident vulnerability and reasonable adjustments when planning services. - Balance out the potential cost of making reasonable adjustments to account for resident vulnerability within agreed spending limits.
Service Managers	To commission audits and reports to check data entry for reasonable adjustments is consistent, robust and of sufficient quality to enable right first time service delivery.
Team Manager	Ensure staff have undertaken all the relevant training and any refresher training and/or additional training that may be required.

	• Ensure staff and contractors are familiar with this policy and associated guidance and incoming staff are made aware through induction. • Contribute to developing and organisational culture which recognises and responds to resident vulnerability through a practice of effective knowledge and information management.
Housing and Landlord Services Staff	• Read and understand this policy. • Follow guidance for making reasonable adjustments. • Always act in accordance with Bristol City Council's Corporate Code of Conduct for Employees, which highlights the 'statutory requirement for the Council and its employees to protect children and vulnerable adults'. • Undertake all training as well as any refresher courses and/or additional training that is required. • Seek input from management if unsure how to proceed.
Housing Policy and Practice Team	• Monitor and review the policy on an agreed cycle. • Ensure guidance is updated as appropriate.
Citizen Services	• To check, update and record access requirements onto the housing management systems at point of contact with residents

Appendix B – Legal and Policy Context

External

- Equality Act 2010
- Data Protection Act 2018
- Care Act 2014
- Human Rights Act 1998
- The Domestic Abuse Act 2021
- The Children Act 1989
- Housing Act 1996
- Family Law Act 1996
- Protection from Harassment Act 1997
- Crime & Disorder Act 1998 S.17
- Freedom of Information Act 2000

Internal

- Bristol City Council Data Protection Policy
- Housing and Landlord Services Gain Access Policy
- Housing and Landlord Services tenancy Sustainment Policy
- Housing and Landlord Services Data Governance Framework for resident data
- Accessible homes Policy
- Heat Network Vulnerable Customers Policy

Appendix C – Definitions of Protected Characteristics

Protected Characteristic	Definition	Statutory authority
Age	For persons over 18 years, age is a protected characteristic and persons with this characteristic must not be discriminated against or be disadvantaged on account of their age. As a local housing authority, Bristol City Council does not consider age a protected characteristic for persons under the age of 18 and therefore is not obligated to provide services to this group where they are not eligible. However, to persons over the age of 18, Bristol City Council will take positive action to ensure that needs arising from their age are addressed to ensure fair treatment.	Equality Act 2010 Part 3 (28).
Disability	Only a person who meets the Act's definition of disability has the protected characteristic of disability. A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.	Equality Act 2010 Section 6(5).
Gender reassignment	A person who has proposed to undergo gender reassignment, even if it is never gone through with, has a protected characteristic and persons with this characteristic must not be discriminated against or be disadvantaged on account of their gender reassignment.	
Marriage and civil partnership	Marriage and civil partnership is a protected characteristic under the Equality Act 2010 but as it is not included under the Public Sector Equality Duty, it is not dealt with in this Policy.	Equality Act 2010 Section 149 (7).
Pregnancy and maternity	This refers to persons who might experience discrimination or disadvantage because of their pregnancy and maternity in the	

	provision of services and exercising of public functions. Unfavourable treatment might include being denied a service, being given a poorer service, being denied an opportunity or excluded from an opportunity.	
Ethnic and national origin	The protected characteristic of “race” is defined in the Act as including ethnic and national origins. Persons with this protected characteristic must not be discriminated against or be disadvantaged on account of their ethnic or national origin. An ethnic origin is defined as having a long-shared history and a cultural tradition. It may also have a common language, literature, religion, geographical origin or be a minority or oppressed group. The courts have confirmed that the following groups are protected under the Act: Sikh, Jewish, Romany Gypsy, Irish Traveller, Scottish Gypsy, and Scottish Traveller. National origin is different from nationality as the latter is the specific legal relationship between a person and a state, whereas the former describes the country of origin which might dictate language use.	
Religion or belief	A person who has, or does not have, a religion or belief is protected under Act from discrimination or disadvantage on account of that religion or belief. The meaning of religion and belief is broad and is consistent with Article 9 of the European Convention on Human Rights. For a philosophical belief to be protected under the Equality Act 2010, it cannot be incompatible with human dignity or in conflict with the fundamental rights of others. Similarly, manifestations of a religion or belief are a qualified right which might be	Article 9: Freedom of thought, belief and religion EHRC.

	limited where they interfere with others' convention rights.	
Sex	Sex is a protected characteristic and refers to a male or female of any age; it does not include gender reassignment as this is its own protected characteristic under the Act. Discrimination or disadvantage on account of a person's sex is prohibited under the Act. For the purposes of showing sex discrimination, the comparator of a person of opposite sex is used.	
Sexual orientation	A person's sexual orientation is protected under the Act from discrimination or disadvantage on account of that orientation. It includes discrimination or disadvantage connected with manifestations of that orientation, such as appearance, places they visit or persons they associate with.	

Appendix D – Examples of Reasonable Adjustments

Below is a list of characteristics and suggested relevant reasonable adjustments; this is intended as guidance only and decision-makers should use resident information to make bespoke reasonable adjustments to each individual.

Please note that the 'details' column is for descriptive purposes only and Housing and Landlord Services shall not record the precise details of a resident's characteristics unless explicitly requested by the resident.

Characteristic	Details	Reasonable Adjustment
Employed	• Full-time employment • Part-time employment • Shift working • Night working	• As far as practicable, avoid contacting the resident or attending their home during their working hours.
Caring responsibilities	• Member of the family • Children	• As far as practicable, avoid times when the resident is unavailable due to caring responsibilities.
Sensory impairment	• Blind • Deaf	• Organise support from nominated person (e.g. Support

		Worker, family member or friend) • Interpret using lip-speaker, deaf-blind communicator, sign-language interpreter, braille text.
Non-English speaker	• Polish • Spanish • Somali • Romanian • Arabic • Italian • All Other Chinese • Portuguese • French • Urdu	• Provide written translation into preferred language • Use telephone interpreter in preferred language • Organise support from nominated person (e.g. Support Worker, family member or friend (over-18 years old)).
Chronic or progressive condition	• Rheumatoid arthritis • Myalgic encephalitis [ME] • Chronic fatigue syndrome [CFS] • Fibromyalgia • Epilepsy • Cancer • Multiple sclerosis • Motor neurone disease • Muscular dystrophy • Dementia • Auto-immune condition	• As far as practicable, adhere to resident's stated preferred times • Send appointment reminders • Allow the resident more time to answer the door • Attempt contact by phone once more after first failed call • Organise support from nominated person (e.g. Support Worker, family member or friend).
Physical impairment	• Asthma • Thrombosis • Stroke • Heart disease • Long-term injury (includes to the brain)	• Allow more time to answer the door • Support from nominated person
Developmental disorder	• Autistic Spectrum Disorder [ASD] • Learning disability (e.g. dyslexia, dyscalculia)	• Appointment reminders • Read letters aloud to resident over the phone • As far as practicable, adhere to resident's

	• Attention Deficit/Hyperactivity Disorder [ADHD]	preferred methods of communications (e.g. post, phone-call, text, email) • Organise support from nominated person (e.g. Support Worker, family member or friend)
Mental health disorder	• Anxiety • Eating disorder • Bipolar affected disorders • Obsessive Compulsive Disorders [OCD] • Personality disorder • Post-Traumatic Stress Disorder [PTSD] • Depression • Schizophrenia	• As far as practicable, adhere to resident's stated preferred times • As far as practicable, adhere to resident's preferred methods of communications (e.g. post, phone-call, text, email) • As far as practicable, ensure a person of the same gender as the resident is in attendance • Support from nominated person (e.g. Support Worker, family member or friend) • Identify and collaborate with other agencies • As far as practicable, keep the resident informed as to the status of the repair or assessment.