

1. Introduction

- 1.1 This policy sets out Peabody's approach to **identifying, assessing and recording** of residents and customers who have additional needs in order to provide tailored services that meet residents' and customers' needs, where appropriate.
- 1.2 We aim to ensure we promote early intervention, positive engagement, empowerment and maximise choices and opportunities for residents and customers to engage with our support services. We recognise the importance of engagement with support services in a way suited to the individual's lifestyle and circumstances.
- 1.3 We will seek to proactively identify people who may require assistance at the earliest opportunity and aim to ensure that we secure the most appropriate, tailored solution for that resident and their household. We will therefore alter our service delivery to residents and customers with additional needs to ensure they receive an excellent service and are not placed in a disadvantaged position.
- 1.4 We will take a holistic approach to the wellbeing needs of a person, not only looking at their additional needs in isolation but how their additional needs impacts their wider wellbeing needs.
- 1.5 Where there is a risk of harm to adults or children who are experiencing, or are at risk from, abuse or neglect we will follow our safeguarding policies and procedures.
- 1.6 This policy has links to some of our other policies, and should be read in conjunction with the following:
 - Safeguarding Adults Policy
 - Safeguarding Children Policy
 - Reasonable Adjustments Policy
 - Antisocial Behaviour Policy
 - Data Protection Policy
 - Equality, Diversity and Inclusion Policy
 - Mental Capacity Policy
 - Responsive Repairs Policy
 - Aids and Adaptations Policy

2. Scope

- 2.1 This policy applies to all Peabody residents and customers, and those of our subsidiaries. This includes leaseholders and shared owners.
- 2.2 In cases where a resident lives in a Peabody property and receives specialist support through an external provider, or where other contractual agreements are in place, this policy will apply to only our housing management responsibilities.

Additional Needs policy

2.3 This policy does not apply to freeholders however we will provide signposting advice, where appropriate.

3. Key terms and definitions

3.1 At Peabody we recognise that at points during our lives we all experience moments of vulnerability. That does not mean however, that we aim to categorise everyone as vulnerable.

3.2 We define requiring **additional needs** as being any condition or circumstance that puts an individual or household at significant risk of losing their home, or any situation which, without support or intervention, places them at risk of abuse, neglect or causes serious detriment to their overall wellbeing.

3.3 Vulnerability is a dynamic state which can be influenced by multiple factors and experiences such as age, disability, bereavement, mental health etc. Having additional needs can be temporary, periodic, or recurring as well as ongoing and developing over time.

3.4 This policy does not assume that whole groups of people have additional needs. For example, it is not correct to assume that all older people or all disabled people will require additional support. Many do not need any additional assistance to sustain their tenancy and remain independent.

Mental Capacity

3.5 Where it is identified that an individual does not have the mental capacity to make decisions for themselves, we will work with carers, advocates and legal representatives of residents and customers with additional needs to ensure they are able to access the services they need in line with the Mental Capacity Act 2005. We are committed to working in partnership with other agencies that support our residents and customers with additional needs.

3.6 We will meet our statutory safeguarding requirements in line with our existing policies and procedures where there are safeguarding concerns about a resident or customer with additional needs.

4. Our approach

Identification of residents with additional needs

4.1 As a housing provider we come in to contact with our residents in a number of ways and some of these ways are listed below:

- Lettings information including information obtained at sign up.
- Residents when they contact us or self-refer.
- Peabody staff who has contact with residents in person, on the phone or through any other channel of communication.
- Our contractors
- A referral from an external agency or partner organisation.

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4.2 We will ensure that Peabody employees who have regular contact with residents and customers receive appropriate training to enable them to identify and support individuals with additional needs.

Recording additional needs

4.3 We may collect and record information about our residents and customers for the purpose of undertaking an additional needs assessment, or to help us to take residents' support needs into account when delivering services. We will conduct reviews on this information to ensure that it is relevant and kept up to date. If a resident or customer is assessed as having additional support needs, we will use this information wherever possible to deliver services with the aim that the individual receives the same service they would have, had they not experienced a support need. We will also help them to access appropriate support. This support may be delivered either by Peabody itself or through referral to external agencies.

4.4 We will notify any resident or customer who the assessment process determines to have additional needs. They will be informed that they will be recorded as needing additional support. If an individual objects to this, we will only process additional needs information without their consent if we can satisfy one of the conditions in the Data Protection Act and General Data Protection Regulation; further advice on this should be sought from the Data Protection Team.

How we will provide services

Communication

4.5 We will advertise and communicate about our services using a variety of platforms to engage with our residents in a way which meets their needs.

4.6 Residents are asked about any communication needs when they start their tenancy and at other opportunities during their tenancy. We will normally expect the resident to have made arrangements to communicate effectively, but in some exceptional circumstances where not to do so would severely disadvantage the resident, we will consider making documents available in other languages and formats such as large print and braille.

Complaints

4.7 When we receive complaints, we utilise the additional needs information stored in the system, along with any information provided by the resident at the time of the complaint, to ensure their needs are considered when resolving the issue. This could involve offering alternative accommodation during home renovations, accommodating specific communication methods required, or making special arrangements to address mobility issues or mental health needs. All responses to complaints will consider the impact of any problems caused by us on our residents, including any additional inconvenience caused by particular additional needs.

Lettings (renters only)

4.8 When allocating our homes, we will review any information we receive on a resident who has additional needs to make sure that any offer of housing is right for the individual and their household members as a commitment to longer-term tenancy sustainment and the resident's safety and wellbeing.

Additional Needs policy

- 4.9 As part of the housing application process, we ask new residents about their needs and that of any needs of a household member and any existing care and support services received. Where appropriate a referral may be made to an external support agency. If a resident chooses not to disclose their full information to us, this may impact the effectiveness of our service to them.
- 4.10 For internal transfers, we require evidence from a medical professional or other support agency of the resident's circumstances before giving any additional priority due to their additional needs in line with our Rehousing policy.
- 4.11 We will assist residents with additional needs to search for homes if they are unable to access our Choice-based lettings website due to their needs.

Rent and service charge Arrears

- 4.12 In line with tenancy and lease agreements, all residents are obligated to pay their rent and service charge on time and we will advise and support those who are struggling to make these payments. We will refer residents and/or their carers who approach us for help or who fall in arrears to our financial inclusion team, or subsidiary equivalent and other money advice services to ensure the resident is managing their finances and has a realistic plan to repay their rent and arrears.
- 4.13 When taking action to recover rent arrears, additional needs risk assessments are completed early in the process, and this is reviewed prior to any decisions to proceed with eviction proceedings.

Anti-social Behaviour

- 4.14 We recognise that antisocial behaviour or harassment may be directed towards an individual or household with additional needs. We will deal with any reports of ASB in line with our ASB policy and Hate Crime policy.
- 4.15 We also recognise that in some instance residents with additional needs may be reluctant to report ASB and may be less able to cope with what may traditionally be regarded as low-level anti-social behaviour. We will be alert to repeat incidents of such behaviour and will not underestimate its potential impact on people with additional needs.
- 4.16 We have a victim-centred approach to all reports of ASB and consider carrying out an additional needs assessment in all cases. This tool helps us measure any additional risks to victims with additional needs and in some cases may advance as safeguarding.
- 4.17 We recognise that perpetrators as well as victims of ASB can have additional needs. Therefore, before commencing legal proceedings, we will ensure that proportionality assessments are carried out in line with the Public Sector Equality Duty to make sure our actions are fair, reasonable and proportionate.
- 4.18 We acknowledge that some residents may act in an anti-social way due to behaviours related to their additional needs and we will try to engage them and relevant support services and carers to improve the situation before taking any tenancy enforcement action. As a landlord we have to balance the safety and well-being of neighbouring residents with the well-being of an ASB perpetrator with additional needs when considering the most appropriate response.

Additional Needs policy

Repairs

- 4.19 We recognise that residents with additional needs may find it more difficult to cope if something goes wrong in their home and they need a repair. When a resident contacts us to request a repair, we will confirm if there are any support needs which should be taken into account.
- 4.20 We aim to work with our repairs contractors to make sure that adjustments to services provided required by our residents with additional needs are taken into account.
- 4.21 We prioritise repairs for elderly and residents with additional needs wherever possible where the nature of the repair could risk the health or wellbeing of that person or household.
- 4.22 We will support adaptations to a property to accommodate a resident's disability/need or that of one of their dependents in accordance with the Aids and Adaptations policy.

5. Equality, Diversity and Inclusion

- 5.1 Peabody acknowledges that not everyone with a protected characteristic will be defined as someone who has additional needs for the purpose of this policy. We will give due consideration to any protected characteristics in deciding any enforcement action under the terms of a tenancy or lease to avoid any inadvertent discrimination.
- 5.2 Peabody will ensure that we address barriers to support/adjustments for those with protected characteristics who may also have additional needs.
- 5.3 Peabody aims to take an intersectional approach when working with people with additional needs. Intersectional approaches offer a way to understand and respond to the way different factors, such as gender, age, disability and ethnicity, overlap to shape individual identities, thereby enhancing awareness of people's needs, interests, capacities and experiences. Taking an intersectional approach will help us to understand the needs of a resident but also resilience of an individual or household.
- 5.4 We will handle and process personal data in accordance with the Data Protection Act, General Data Protection Regulation and our Data Protection Policy.

6. Legislation and regulations

- Mental Capacity Act 2005
- Equality Act 2010
- Care Act 2014
- Data Protection Act 1998 and General Data Protection Regulation
- Mental Health Act 1983
- Homes and Communities Regulatory Framework 2015

7. Responsibilities

- 7.1 The Managing Directors of all regions has overall accountability for this policy and its implementation

Additional Needs policy

7.2 For Town and Country Housing, the Operations Director has overall accountability for this policy and implementation

Approval

Version number	V1
Effective from	27 th January 2026
Policy owner	Managing Director of North Counties