



WCHG Help to Access Our Services Policy

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Responsible director	Paul Seymour Executive Director Customers and Communities
Policy monitoring body	Customer Experience Committee
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Support:

We can provide this guide in large print, braille, audio, or other languages, just ask. If you have any questions or need extra support, please get in touch on the details below:

Call us: 0300 111 0000

Email us: customerenquiries@wchg.org.uk

1. Purpose and scope

- 1.1. The purpose of this policy is to set out our high-level position around tailoring our services to meet individual needs.
- 1.2. This policy applies to all WCHG customers and outlines Wythenshawe Community Housing Group's (WCHG) commitment to assisting customers defined as vulnerable and making sure they receive the help they need to sustain their tenancy.
- 1.3. This policy does not set out all the different ways in which we might tailor a service we deliver. We aim to foster a culture where colleagues feel empowered to confidently and sensitively respond to the diverse needs of residents.
- 1.4. This policy will set out:
 - How we define vulnerability and how we respond to those customers' needs, 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 and the support residents can expect from us
- 1.5. This policy centres on residents who may be vulnerable as outlined in section 2 but have the ability to make their own decisions. Where a resident is assessed as not having the ability to make decisions we will work with their chosen spokesperson or advocate.
- 1.6. This policy outlines the commitments WCHG 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 process are reflective of their needs.

2. Defining vulnerability

- 2.1. For the purposes of this policy, the term vulnerable is being used for clarity and to align with the Housing Ombudsman and Ofgem definitions.
- 2.2. We have adopted a fluid definition of the term vulnerable that is situation-based:

'We recognise that vulnerability can be experienced by any customer at any time. Vulnerability arises when a housing or energy consumption issue disproportionately impacts a customer due to their personal circumstances or characteristics (either protected or un-protected).'

2.3. We also align with the Office of Gas and Electricity Markets (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 his or her interests in the energy market and/or;
- Significantly more likely than a typical consumer to suffer detriment, or that detriment is likely to be more substantial.

2.4. Protected characteristics are listed under the Equality Act 2010. They are:

- Age
- Gender reassignment
- Marriage or civil partnership
- Pregnancy or maternity
- Disability
- Race and ethnicity
- Religion or belief
- Sex
- Sexual orientation

2.5. We recognise that not every individual who is protected by the Equality Act (2010) has additional needs related to housing or energy. We recognise customers may not identify with being 'vulnerable' but may have additional needs. These needs may vary over time and may have no bearing on a customer's ability to sustain their tenancy or ask for a service.

2.6. If you identify as being vulnerable, we will give extra support or a quicker response to make sure you are not disadvantaged. For customers on our heat networks this will be recorded on our Priority Services Register (PSR).

2.7. Heat network customers will receive additional information on how to sign up to the PRS including the extra support available to them.

Examples of vulnerability:

- Low income, severe financial insecurity (e.g., debt issues, illegal money lending)
- Housing issues include housing costs, property conditions, including lack of heating or hot water.
- High and low Heat consumption users (indicator of fuel poverty, additional service or medical needs).

- Personal circumstance includes experience of homelessness, experience of domestic abuse, alcohol and drug dependency, bereavement, digital access, a short-term health issue.
 - Communication needs, including language
 - Unprotected characteristics include carer status
- 2.8. 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.

3. Identifying and responding to vulnerability

- 3.1. 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.
- 3.2. A resident's vulnerability may be identified by:
- The resident or their representative contacting us for extra support
 - Any WCHG colleague who is in contact with the resident
 - A referral from an external agency/organisation
- 3.3. There are several touchpoints in which we may confirm with a customer, details of their vulnerability or seek to confirm information we already hold on them. Examples of touchpoints where customers will be asked for information on vulnerability or if there is a support needed for a vulnerability:
- Tenancy application and sign-up
 - Annual home visits
 - Heat network priority services register
 - Conversations with our Customer Hub
 - Financial Inclusion conversations
 - Living well referrals and Tenancy Audit visits
- 3.4. 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 give 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.
- 3.5. We recognise the important role that advocates can play in supporting vulnerable residents to make sure they are receiving a good service. With the resident's explicit consent, we will correspond with a family member or third party on their behalf. 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 WCHG's policies.

4. Reasonable adjustments

- 4.1. Residents can ask for a reasonable adjustment from any colleague at WCHG. We will take into consideration a vulnerable resident's needs and circumstances, to help them live well and carry out their tenancy.
- 4.2. 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 looking at whether an ask is reasonable, we will consider:
 - Effectiveness: the adjustment should fully address the resident's need
 - Practicality: we must be able to practically make the adjustment
 - Resources: how much time the adjustment will take and any related costs
- 4.3. We have clear process' in place for colleagues to assess the reasonableness of a request. If the colleague's response - or lack of one - does not meet your need, you can raise the matter with the Customer Feedback team who will review our response.

5. Recording and monitoring customer data

- 5.1. 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.
- 5.2. 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.
- 5.3. We share this information with our WCHG colleagues and contractors where needed, to provide instructions on how to tailor the service; for example, by explaining that the resident may need more time to answer the door.
- 5.4. Where a resident gives us information it will be used to inform how we deliver our services, this is recorded on their individual account and looked at ahead of all interactions that it affects. 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 our vulnerable heat network customers.
- 5.5. We always collect vulnerable customers' information lawfully and fairly, store it securely and make sure that it is only kept for the length of time it's needed. We explain how we do this in our Data Protection Policy: <https://www.wchg.org.uk/wp-content/uploads/Data-Protection-Policy-Jul-2023.pdf>
- 5.6. We tell customers about how we use their data and how they can exercise their information rights in our privacy notice, which is available at: <https://www.wchg.org.uk/privacy-notice/>

6. Roles and responsibilities

- 6.1. We also work closely with our appointed Heat Network contractors, including Our Metering and Billing Providers and repairs and maintenance teams to ensure that this policy is implemented at all levels of Heat Network management.

7. Legislative framework

- 7.1. This policy statement incorporates several legislative and regulatory requirements, which includes 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

Other relevant documents

- The Social Housing Regulator's Transparency, Accountability and Information Standard require 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.
- Article 8 of the Human Rights Act an individual has a right to privacy, or the right to 'physical or psychological integrity'.
- WCHG Reasonable adjustment statement

Appendix 1

Examples of reasonable adjustments these can be physical or online:

- Aids and adaptations to a property dependent on need.
- Allowing longer for you to answer the door.
- Documents and letters in different formats such as braille or large print or translation of documents and letters into other languages
- Arranging a joint visit with a support worker/representative.
- Hearing loops in our offices
- Visits specifically from female colleagues or in pairs
- When ordering a repair, if a member of the household is vulnerable and a delay will be bad for their health the repair may be sooner than its scheduled target date (but should be booked as scheduled with a note to show the vulnerability).
- If damp and mould are reported and a member of the household is vulnerable the remedial process should be escalated in line with this.
- Visit in person to explain matters or explain the content of a letter by telephone call.