

Meeting Cabinet
Portfolio Area Housing
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DRAFT VULNERABILITY POLICY (HOUSING SERVICES) 2025-2027

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KEY DECISION

1 PURPOSE

- 1.1 To present a draft Housing Service Vulnerability Policy 2025-2027 in line with good practice and the expectations from the Regulator of Social Housing and the Housing Ombudsman Service.
- 1.2 The Policy will ensure that the Council is compliant with legislation and has a clear focus on addressing vulnerability within housing services.

2 RECOMMENDATIONS

- 2.1 That Cabinet note the duty placed on the Council under the Equality Act 2010, The Transparency, Influence and Accountability Standard and the Housing Ombudsman Complaint Handling Code for landlords to recognise and respond to vulnerability and to approve the Housing Services Vulnerability Policy at Appendix A.

- 2.2 That Cabinet recommends that the Vulnerability Policy is consulted on with tenants and prospective tenants for no less than four weeks and that following, the Strategic Director (RP), in consultation with the relevant Portfolio Holder, be given delegated authority to approve the Policy and to implement minor updates and changes arising from new legislation or best practice.

3 BACKGROUND

- 3.1 The Council has a duty under the Equality Act 2010 to advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share them. However, the Council as a social landlord recognises that many tenants can be vulnerable for reasons other than the characteristics under the equalities legislation, and this policy sets out how the Council defines vulnerability and how as a landlord, it will respond to tenants' needs.
- 3.2 The Regulator of Social Housing's (RSH) Transparency, Influence and Accountability Standard states that landlords **must take action to deliver fair and equitable outcomes for tenants and prospective tenants** and **must treat tenants and prospective tenants with fairness and respect**. Landlords should also consider how they can adapt their services and communications to meet individual tenants' needs.
- 3.3 The RSH Consumer Standards also require landlords to understand the diverse needs of tenants, including those arising from protected characteristics, language barriers and additional support needs. The importance of accessible and appropriate information and communication is also emphasised.
- 3.4 The Housing Ombudsman Complaint Handling Code provides that landlords should comply with the Equalities Act 2010 and may need to adapt normal policies, procedures and processes to accommodate an individual's needs as well as anticipate the need for reasonable adjustments.
- 3.5 In January 2024, the Housing Ombudsman published a spotlight report on attitudes, respects and rights, titled Relationships of Equals. The report focused on the meaning of vulnerability within social housing and how social landlords could better support the needs of those tenants and their households. It also emphasised the importance of a landlord's approach to customer vulnerabilities in being more flexible and agile, and able to adapt core services to better meet the needs of customers, without stigma or marginalisation.
- 3.6 The Housing Ombudsman Service defines vulnerability as, *"A dynamic state which arises from a combination of a resident's personal circumstances, characteristics and their housing complaint. Vulnerability may be exacerbated when a social landlord or the Housing Ombudsman Service does not act with appropriate levels of care when dealing with a resident's complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced"*. This is the definition that has been adopted within the Policy.

3.7 There are several recommendations from the HOS spotlight report including the introduction of a new duty for agencies to co-operate to enable there to be easier communication to ultimately best support those considered vulnerable within social housing.

3.8 Specific recommendations for social landlords also include;

- A review of whether the Council is currently offering a 'human-centric' service provision.
- The implementation of a Vulnerability Policy, including how vulnerability is defined, who assesses vulnerability, and what the review process is. This must be in line with the Equality Act 2010, the Human Rights Act 1998 and the Care Act 2014.
- To test the policy in practice against the 3Rs – **recognise, respond** and appropriately **record** vulnerabilities.
- Implement a specific reasonable adjustments policy.
- Introduce minimum staff training requirements and training on customer care, mental health and learning disabilities.
- Ensure awareness and accessibility to the complaints' procedure – this is also highly relevant to ensure compliance with the Statutory Complaint Handling Code.

4 REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS

4.1 The Housing Service Vulnerability Policy, sets out the Council's approach to ensure that all customers can easily access housing services, including support required to sustain their tenancy. The policy sets out clearly the approach taken by the Housing Service to 'recognise, record and respond' to customer vulnerability and will help the Council demonstrate how it will achieve the standards.

4.2 Analysis of the continuous recording of lettings and sales (a statutory data return providing a national information source referred to as CORE data), indicates that approximately 80% of new tenants housed by Stevenage Borough Council are considered vulnerable. There is also a higher-than-average number of older persons residing within Stevenage.

4.3 It is recognised that some new and existing tenants require additional support due to vulnerabilities, or specific challenges that are being experienced. In the summer, the Council updated its Tenancy Sustainment Policy to set out the approach to how support will be delivered in these circumstances.

4.4 All households that move into a Council property are assessed and their circumstances reviewed to ensure any vulnerabilities, complexities or special

circumstances are identified and recorded. This information is used to determine how services are delivered.

4.5 Where tenants contact the Council to report a repair or indicate through online reporting tools that there are circumstances that should be considered, the Council records and acts on this data. The Council also proactively captures any vulnerabilities or impairments through its Complaint Handling process and this helps to inform the approach to responding to complaints and any reasonable adjustments that should be considered for future service delivery.

4.6 The Council also gathers vulnerability and impairment information through day-to-day contact with tenants as well as a rolling programme of tenancy audits. The current tenancy audit programme has been developed utilising a range of information including that on residents' diverse needs along with consideration to arrears, repair reporting history and other appropriate information.

4.7 The Council records vulnerabilities on the Housing Management System and can flag key areas which include: -

- Hearing impairment
- Learning Impairment
- Mental/emotional distress
- Mobility Impairment
- Visual Impairment
- Wheelchair Impairment
- Requires Assistance with reading and writing
- English is not the first language

This information is then available to all system users and is highlighted and transferred into third party systems where visits are planned, and to allow information to be reviewed and updated as part of support visits, tenancy audits or other opportunities for details to be checked.

4.8 The delivery of this policy will be monitored on an ongoing basis, to allow service provision to be reviewed and areas for improvement to be identified. The effectiveness and outcomes of the policy will also be reviewed through feedback from sources where customer vulnerability information has been captured, such as via the Council's Complaints Handling Policy. This will be used to shape and steer the next review of the Policy.

4.9 This report recommends that Cabinet approves that the Vulnerability Policy is consulted on with tenants and prospective tenants for no less than four weeks and that the Strategic Director (RP), in consultation with the relevant Portfolio Holder, be given delegated authority to approve the Policy and to make minor updates and changes arising from new legislation or best practice.

4.10 The Executive Housing Working Group has reviewed the Housing Service Vulnerability Policy and endorse the Policy and the recommendations.

5 IMPLICATIONS

5.1 Financial Implications

- 5.1.1 There are no direct financial implications arising from the recommendations contained in this report, however failure to identify and respond to vulnerability may have a consequence in terms of compensation payments from the HOS or through the Complaints Policy as well as not providing support to tenants who make not be able to access services, keep their homes in good repair or pay their rent.

5.2 LEGAL IMPLICATIONS

- 5.2.1 The Housing Service Vulnerability Policy will ensure the Council is compliant with the Consumer Regulations as set out by the Regulator of Social Housing as well as the Housing Ombudsman Complaint Handling Code.

5.3 EQUALITIES AND DIVERSITY IMPLICATIONS

- 5.3.1 An Equalities Impact Assessment has been completed and can be seen at Appendix B. There are no negative equality, diversity and inclusion implications arising from the Vulnerability Policy.

5.4 RISK IMPLICATIONS

- 5.4.1 There are no direct significant risks to the Council in agreeing the recommendation(s). However, officers responsible for implementing any improvement activity set out within this report will need to consider any risk implications that arise.

5.5 CLIMATE CHANGE IMPLICATIONS

- 5.5.1 The Council declared a climate change emergency in June 2019 with a resolution to work towards a target of achieving net zero emissions by 2030. There are no direct climate change implications arising from this report.

5.6 OTHER CORPORATE IMPLICATIONS

- 5.6.1 The Council is at reputation risk if it does not comply with the Regulator for Social Housing's Consumer Standards'. The Council is also at reputation and financial risk if it does not comply with the HOS Complaint Handling Code.

6. BACKGROUND DOCUMENTS

[HOS Spotlight Report](#)

[Transparency Influence and Accountability Standard](#)

APPENDICES

Appendix A – Draft Housing Service Vulnerability Policy 2025-2027

Appendix B - Equality Impact Assessment