Vulnerability Policy (Housing Service)

Stevenage Borough Council

2025 - 2027

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1. Purpose

1.1 Stevenage Borough Council (SBC) recognises that some residents may be vulnerable for a range of reasons and is committed to helping to meet their needs through the provision of suitable accommodation and appropriate, responsive landlord services.

1.2 We recognise that some residents will have a degree of vulnerability that may impact how they are able to manage their home or engage in their community and that a resident may become vulnerable over the course of their time with SBC.

1.3 Vulnerability can be a variable state and can occur at different points in a person's life. It can be temporary, periodic or recurring as well as on-going and there are a number of indicators that someone may be vulnerable or in need of individual support.

1.4 We are aware that the word 'vulnerable' can have limitations and stigma attached to it, however recognising that there is a need for staff, contractors and stakeholders to recognise vulnerable residents, we continue to use the word vulnerable as a universally understood term.

1.5 As a responsible social landlord, a key objective is to ensure that all customers have equal access to SBC services and that we identify, understand, and respond to our customers' particular needs in providing services and communicating with vulnerable customers, making flexible housing and support services available where we can, and supporting all people to thrive in their homes and communities. This policy outlines how we will;

- Use available information and customer contact points to help identify vulnerabilities and establish the best course of action to meet their needs
- Record details of vulnerabilities where it is appropriate to do so and highlight actions required on our housing management systems to ensure consistency of services
- Record any known representatives who have authority to act on a customer's behalf including where a relevant Lasting Power of Attorney is in place
- Adopt a personalised approach to ensure customers can access services in a way that works for them and their individual circumstances

- Refer customers to other council services and use onward referrals and signposting where appropriate Make safeguarding referrals in line with our safeguarding policy
- Work with our tenants and leaseholders to identify service improvements to enable us to better meet the diverse needs of our customers

1.6   This policy supports the Council's Equality and Diversity Policy, the Reasonable Adjustments Policy, The Tenancy Sustainment Policy and the Council's Safeguarding Policies.

2.   Scope

2.1   This policy applies to all residents living in properties owned by the Council and all prospective tenants. Council employees and contractors within the are responsible for ensuring that the policy is implemented effectively.

2.2   This policy provides guidance in relation to the consideration of vulnerability and sets out the general approach that SBC will adopt in relation to the provision of accommodation and services to customers who may be vulnerable.

2.3   The policy sets out our approach to partnership working with statutory and specialist services in relation to vulnerabilities. SBC recognise that we are not always best placed or sufficiently specialist to meet customer needs and will often need to work in effective partnership to respond to customer vulnerabilities.

3.   Legal and Regulatory Framework

3.1   This policy sets out how the Council will comply with the requirements of the following:

- Social Housing (Regulations) Act 2023
- Section 149 of the Public Sector Equality Duty
- Equality Act 2010
- Care Act 2014 & Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012
- Mental Capacity Act 2005

3.2   The Regulator of Social Housing's Consumer Standards and Code of Practice state that landlords must take action to deliver fair and equitable outcomes for tenants and prospective tenants in the services they provide and should consider how they can adapt their services and communications to meet individual tenants' needs. They also expect 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.

3.3   The Housing Ombudsman has stressed the importance of a landlord's approach to customer vulnerabilities, including the need to recognise, adjust and respond to customers' individual circumstances. Landlords must be flexible and agile and able to adapt core services to better meet the needs of customers, without stigma or marginalisation. Effective communication is seen as critical in maintaining positive relationships, and landlords should move to a 'human centric' model of service provision.

4   Equalities

4.1   Under the Equality Act 2010 the Council has a legal duty to fulfil the requirements of the Public Sector Equality Duty (PSED). Through this duty, the Council will carry out its functions in a way that:

  a) Removes discrimination, harassment, victimisation and any other conduct that is unlawful under the Equality Act 2010
  b) Promotes equal opportunities between people who have a protected characteristic(s) and those who don't
  c) Encourages good relations between people who have a protected characteristic(s) and those who don't

4.2   Further information on the Council's fulfilment of the PSED is set out in the Equality, Diversity and Inclusion (EDI) Policy (2024) which is applicable to all employees of the Council, Councillors and contractors or suppliers who provide services on behalf of the Council.

5   Data Protection

5.1   The Council regards respect for the privacy of individuals and the lawful and careful treatment of personal information as very important to its successful operations and to maintaining confidence between the Council and those with

whom it carries out business. The Council will ensure that it treats personal information lawfully and proportionately as set out in the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

5.2   The Council's principal aim is to ensure that all personal data processing carried out by the Council, or on its behalf, complies with the seven data protection principles and other key legislative requirements. For further information on the Council's approach to handling information please see the Data Protection Act web page at www.stevenage.gov.uk

6   Policy

6.1   Vulnerability can be defined as ***a dynamic state which can arise from a combination of a resident's individual circumstances, characteristics and external factors.*** Everyone experiences vulnerability differently; therefore, this policy outlines our person-centred approach to meeting the individual needs of our residents.

6.2   Vulnerability is not static; it can be permanent or temporary and is often multi-dimensional. No group of people is inherently vulnerable, it can occur at different points in a person's life, for instance for a temporary period following a bereavement, or it may be a permanent health condition which requires us to personalise our services in a specific way. Vulnerabilities may put someone at risk of harm, cause them to be unable to comply with the terms of their tenancy agreement or prohibit access our housing services.

6.3   We will aim to identify customers and potential customers who are or may later be more likely to become vulnerable. This will be achieved through a mix of capturing data on the commencement of service with us, tenancy audits and through ongoing contact customers have with us. We will use data to identify customers who may be struggling and when delivering a service and we will ask customers to share with us any vulnerabilities which they feel will impact the way we deliver that service and what reasonable adjustment they feel could help. We will capture this information including where a customer declines or identifies that no changes are required.

There may also be circumstances in which we will receive information from third parties, or from a family member or carer about a resident, and we understand that in some cases residents may not always understand or accept that they are vulnerable, but we will consider the information available to determine an appropriate response.

6.4   SBC will educate all staff and contractors to be aware of the possibility that a customer may be vulnerable e.g. from information they receive or following their own interactions with the customer during customer contact or working in a customer's home.

6.5 The Housing Ombudsman Service (HOS) recommends that landlords should consider the 3R's approach to vulnerability.

RECOGNISE – identify and understand customer vulnerability

REPOND – adopt a person-centred approach to meeting residents needs

RECORD. – keep accurate data of known vulnerabilities

6.5 Recognising Vulnerabilities

Employees will receive training to recognise potential signs of vulnerability such as:

- Being the perpetrator of antisocial behaviour due to mental health issues
- Being the victim of antisocial behaviour, harassment, domestic abuse or crime
- Hoarding, self-neglect or other behaviour which results in a person's home or garden becoming neglected or damaged
- Failing to maintain the conditions of tenancy such as regular rent payments

Employees will also receive additional training relevant to their role including:

- Safeguarding Training
- Equality and Diversity Training
- Mental Health Training
- Conflict Management Training

The Council uses different contact points to identify resident vulnerability including:

- Reviewing any support needs or vulnerabilities indicated in a Housing Application Form
- At the sign-up stage for a new tenant
- During home visits, rent discussions and tenancy audits
- Information provided by relatives, care givers and advocates
- Reports via external agencies e.g. support agency, police, fire service
- Observation through housing management activities e.g. a repairs operative raising a concern about a tenant following a visit to their home, or through assessments in our supported accommodation
- Proactively asking during contact for repairs and complaint handling. Other contact including phone contact, face to face visits and online interactions
- There is no single list of what would be considered to define vulnerability, however there are circumstances or factors which but the list in Appendix A can provide

some guidance on issues or instances when a person be considered as vulnerable and should be considered.

6.6   Responding to Vulnerability

We will embed in our way of working consideration of vulnerable residents' needs, abilities and circumstances in the delivery of our services and ensure they receive the required service, advice or assistance.

Where we do not have expertise relating to a particular vulnerability, we will work with suitable partner organisations to ensure that appropriate support is made available. We fully recognise the need to work with qualified professional services and we actively build and maintain links with these partners. We will support those with vulnerabilities to sustain their home and tenure when it is safe to do so, and their wish, by signposting and accessing support services from relevant local partners. We will always aim to seek a residents' consent before referring to a partner agency.

We ensure that we proactively attend and participate in key multi-agency meetings to ensure we have strong and relevant local connections. We will regularly attend multi-agency forums and where we have a particular concern relating to vulnerabilities, we may coordinate a multi-agency case conference, to ensure a coordinated community approach.

Reasonable Adjustments: Reasonable adjustment means a change to service provision which seeks to, as far as possible, remove any disadvantage faced by those with a protected characteristic or a vulnerability. Each of our service areas will consider any variation or adjustment that might be required and is appropriate in the circumstance to meet individual needs. This will vary by service, but some examples are:

- Allowing longer for a customer to answer the door
- Arranging a joint visit with a support worker/representative
- Having male/female only officers present when visiting or working in the home
- Visit in person to provide information or explain the content of a letter by telephone call
- Providing information in different formats
- Providing interpreting services

Representatives and Advocates: Residents can choose to appoint a relative, friend or other representative such as an advocate or local ward member to be able to speak to us and act on their behalf in relation to council services.

Lacking Capacity: If we are notified that a customer lacks capacity, then in line with the Mental Capacity Act 2005, we will liaise with those who have legal authority to act on their behalf.

Additional Support: Where a concern related to customer vulnerability is reported, a tenancy audit will be prioritised where appropriate. Home visits provide an opportunity for our housing officers to visit tenants at home to discuss any issues. During the visit housing officers will:

- Check tenant and household details
- Check that the home is safe and identify any repairs
- Provide advice and support to help tenants to manage their tenancy
- Make onward referrals to other agencies and services if needed
- Make safeguarding referrals if needed

Where someone is struggling to maintain their tenancy, they may be referred to our specialist support officers. This specialist team works with tenants with more complex needs. This includes those who have:

- Physical and mental health needs
- Learning difficulties and disabilities
- Difficulty in maintaining their tenancy (e.g. first tenancy or rent arrears)
- Experiencing domestic abuse
- Hoarding and property condition

6.7 Recording Vulnerabilities

SBC will record customer details on the customer record within our housing management and associated systems to enable us to meet individual needs. This includes any support, communication or access needs, and where anyone other than the tenant is authorised to speak to us on the tenant's behalf.

We will share relevant information across appropriate council services to support consistency of service. This is to ensure that when any contact with a customer is made, there is a record of the actions required to enable the member of staff to act accordingly to meet individual needs. We will work collaboratively with customers to ensure that the actions we take result in a positive outcome.

Safeguarding concerns will be raised in line with our Safeguarding children and vulnerable adults' policy and procedure which set out how we ensure that the relevant partner agencies such as social care are notified when we have a concern.

7   Consultation

7.1   This policy has been consulted on with the relevant teams within the Housing and Neighbourhoods Directorate and the Portfolio Holder for Housing.

8   Monitoring and Review

8.1   This policy will be reviewed by Head of Housing every 2 years or earlier if there is a change in legislation. Where more than 10% of the policy content is changed this will require sign-off from the Assistant Director and appropriate Portfolio Holder.

8.2   Any person who is dissatisfied with the way that the Council has implemented this policy or delivered services arising from this policy has the right to make a complaint. The Councils Complaints Policy and Procedure should be followed in this instance.

9   References and Resources

SBC Tenancy Sustainment Policy (2024)

SBC Reasonable Adjustments Policy (2024)

SBC Safeguarding Policy

10   Abbreviations and Definitions

EDI   Equality, Diversity and Inclusion
GDPR   General Data Protection Regulation
PSED   Public Sector Equality Duty
SBC   Stevenage Borough Council

11   Appendices

Appendix A – Factors in Defining Vulnerability
Appendix B – Vulnerability Policy Equality Impact Assessment 2024

12 Version History

Date	Outlined Amendments	Author
November 2024	**Draft version 1**	**Kerry Clifford**
January 2025	**Draft version 2**	**Matt Gough**

APPENDIX A

FACTORS IN DEFINING VULNERABILITY

The categories below do not list every possible factor as the whole spectrum of who could be regarded as vulnerable at any point in time is wide, but these are the more common factors to take into consideration when considering a customer's state of vulnerability.

Factor 1 Underlying characteristic (people in these groups may not always require additional support just because of this characteristic)

- Older people (particularly those 75 years or older)
- 16 – 21-year-olds
- Very young children and babies (particularly those 2 years old or under)
- Disabled people
- Care leavers
- Lone parents under 21 years old
- Refugees or asylum seekers
- Carers
- Families with disabled children
- Ex service personnel
- Those living with a terminal illness

Factor 2 Ability to act, engage and cope – (people may lack ability because of having one or more of these factors)

- Learning disability
- Mental illness
- Autism Spectrum Disorder
- Permanently impaired mobility or frailness
- Chronic, debilitating health conditions
- Addiction/serious substance or alcohol abuse
- Low level of literacy
- Low or no English language skills
- Age related conditions that impact on independent living

Factor 3 Exceptional life event (people may not have factors 1 and 2 but may have recently experienced an exceptional or traumatic event and so may be vulnerable at this

point in time)

- Recent history of street homelessness
- Recently moved from supported accommodation to independent living
- Bereavement following the death of a partner, child, or other close relationship
- Having recently left care as a young person
- Sexual or racist abuse or serious harassment or other hate crime
- Recent experience of domestic violence
- Living in or recently left a refuge or homeless persons' hostel
- Recently discharged from hospital or other institutional care
- Periods of sustained physical or mental illness at home
- Multiple debts and unable to meet basic needs e.g. fuel or food poverty
- Pregnant women
- Recently given birth, still born or miscarried
- Recently released from prison after a custodial sentence
- Families with children excluded from school
- Ex-service personnel returning from area of conflict