

## Vulnerability Strategy 2026-2029



**“Making Services Accessible to  
Everyone”**

# Neighbourhoods & Housing Vulnerability Strategy

## 1. Introduction

- 1.1 The aim of the Vulnerability Strategy (the Strategy) is to provide a framework for Neighbourhoods and Housing (N&H) to provide people-centric, accessible services to ensure that everyone can fully participate in and benefit from these services regardless of their specific needs.
- 1.2 "People-centric" means putting people and their individual needs at the heart of the service design process.
- 1.3 Accessible" means making sure services can be used by as many people as possible all the time.
- 1.4 Beyond making services accessible to everyone, N&H recognise some customers may require additional support to sustain their tenancies or access services. Additional individual reasonable adjustments can be made where this benefits a customer with specific needs or vulnerabilities to make sure no-one is disadvantaged as a result of their vulnerabilities.
- 1.5 For N&H to be able to turn its aim into reality it will need all staff, partners and stakeholders to be able to identify, understand and act on customers' collective and individual needs. This requires a change of culture.
- 1.6 N&H current mission statement is:

***“Delivering neighbourhood and housing services which meet the changing needs of residents and strengthen their local communities”***

- 1.7 This Strategy meets N&H's values which are:
- **People First** - We strive to improve the quality of life for all people and families
  - **Respect** - We treat everyone with respect, integrity, honesty, and fairness
  - **Learning** - We are curious and open to different ideas, we value feedback and constructive challenge
  - **Ambition** - We are ambitious for our city and push the boundaries of what we can achieve
  - **Partnership** - We work closely together across communities, the council and with our partners
- 1.8 This Strategy fits with the 'People' theme in N&H's Housing Strategy:
- Support vulnerable residents across different housing and non-housing services, including through supported accommodation, tenancy sustainment, and a best-in-class adaptations service

## 2.0 Scope



- 2.1 This Strategy applies to all services delivered by N&H and is tenure neutral applying to all N&H customers, this may be current or former customers, an applicant for housing, or person(s) affected by N&H's range of services.
- 2.2 This Strategy applies to:
- Customers and household members, who live in accommodation owned managed by N&H
  - Customers N&H deliver community-based services to
  - All stakeholders / partners commissioned by N&H
  - All staff working in teams within N&H that respond to and provide services to customers, as well as contractors.
- 2.3 This Strategy follows guidance and references from the Housing Ombudsman Relationship of Equals and Knowledge and Information Management spotlight reports and the two sets of recommendations.

### 3.0 Defining Vulnerability

- 3.1 N&H are aware that the word 'vulnerable' can have limitations and stigma attached to it, however N&H understand that there is a need for staff, contractors and stakeholders to recognise vulnerable customers as a group who will have very individual needs and N&H will continue to use the word vulnerable as a universally understood term.
- 3.2 N&H have adopted a fluid definition of vulnerability, which can be applied across multiple housing services as the strategic housing authority and a social landlord:

***A vulnerable person can be defined as a person (or households in which there is a person), whose characteristics, personal circumstances and / or individual needs means they may be disproportionately impacted and / or, makes them more susceptible to experiencing harm or the risk of harm.....Certain individuals may be impacted by multiple vulnerabilities, and we recognise that this is a dynamic state, which can change over time.***

#### Vulnerability Risk Factors

- 3.3 Risk factors can increase the likelihood that a person may become vulnerable or have heightened risk if a vulnerability is already known. Risks may also be a contributing factor, and not always a direct cause of a vulnerability. In general, across N&H, there are four broad stands of risks
- 3.3.1 *Individual* - Inherent potential vulnerability due to demographic and/or circumstances such as age, disability, physical health, mental health (incl. hoarding), inequality/discrimination (due to language/religion etc), economic deprivation (low income), gender, poor social mobility, and having/being a caregiver.
- 3.3.2 *Occupancy* - There are some identified occupancy risks, such as: domestic abuse, overcrowding (family size), property condition and repair status (incl. frequent repairs), alcohol/substance misuse, indicators of tenancy stress (e.g. high rent arrears, capped gas).
- 3.3.3 *Community / Society* - Community Safety Risk such as crime hot spots, cuckooing, county lines, violent offenders in the community, homelessness, difficulty accessing services and areas with high levels of anti-social behaviour.
- 3.3.4 *Short Term Impact* - Life events which may have a short-term detrimental impact such as illness or injury, care leavers, bereavement, pregnancy, family breakdown/social services involved, recently left supported accommodation or institution.

### 4.0 Key Principles of the Vulnerability Strategy



### Reasonable Adjustments

- 4.1 A reasonable adjustment is a legal term defined by the Equality Act 2010. Its purpose is to ensure all services can be equally accessed by customers with disabilities, as well as those without so as not to be disadvantaged through the provision of service.
- 4.2 A 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. It is not possible to produce an exhaustive list of reasonable adjustments since an adjustment can only be determined as reasonable or not in relation to a specific set of circumstances. However, the Equality and Human Rights Commission recommends consideration of the following factors in determining what is 'reasonable':
- How effective the adjustment will be in avoiding the disadvantage the customer would otherwise experience
  - The practicality of the adjustments
  - The extent of any disruption the adjustments might cause
  - The costs of making the adjustment, whether they are possible within N&H resources
- 4.4 Specific needs and vulnerabilities will often be known before any interaction with a customer, and reasonable adjustments can therefore be made in advance of any customer interaction and staff will be trained to understand and implement reasonable adjustments as they interact with customers
- 4.5 Each service area will consider what additional support, consideration or variation in service provision is appropriate for customers. This will be at the service areas discretion and supported by staff training on what are and how to make reasonable adjustments.
- 4.6 This Strategy focuses on customers who have the capacity to make their own decisions. Where a customer is assessed as lacking the capacity to make decisions N&H will follow its own Mental Capacity Act guidance and work with their appointed representatives.
- 4.7 The Mental Capacity Act 2005  
The Mental Capacity Act 2005 provides the legal framework for acting and making decisions on behalf of people (aged 16 or over) who lack the mental capacity to make a particular decision for themselves.
- 4.8 This Strategy does not replace Safeguarding Children and Safeguarding Adults Policies and Procedures and associated roles and responsibilities. Where staff, partners and contractors identify a risk of harm, abuse, or neglect, these safeguarding issues will be reported by following safeguarding procedures.

## 5. Key Principles of the Strategy

- 5.1 N&H does not define whole groups of people by default e.g. 'the young,' 'the old' or 'single parents. N&H will embed into its routine service delivery, consideration of and response to protected characteristics, vulnerabilities, different needs, abilities, and circumstances.
- 5.2 The Strategy has been informed by the Housing Ombudsman Service recommendation to apply the 3R's approach to customers, particularly vulnerable customers:
- *Recognise* – identify and understand customer's needs, vulnerabilities and differences and the impact on service delivery
  - *Record* – keep accurate up to date information of customers, including their known vulnerabilities and differences on housing management systems that are visible for staff to use
  - *Respond* – adopt a person-centred approach to meeting customers' needs and vulnerabilities and differences by making reasonable adjustments or referral



## 6. Strategic Themes

6.1 This strategy contains 3 themes based on the Housing Ombudsman Services recommendations above at 5.2.

### THEME 1 - Identify Customer Needs – (Recognise)

6.2 N&H encourages customers to be open and honest around their specific needs and vulnerabilities. N&H will ask customers to share and self-refer any protected characteristics, specific needs and vulnerabilities which they feel will impact the way N&H deliver a service and, if necessary, what reasonable adjustment they feel could help so that N&H can provide human-centric, accessible services. N&H will capture this information including where a customer declines or identifies that no changes are required.

6.3 Having specific needs and vulnerabilities can be a variable state and can occur at different points in a customer's life. It can be temporary, periodic, or recurring as well as on-going and there are a number of indicators that someone may have specific needs and vulnerabilities.

6.4 Specific needs and vulnerabilities may be recognised at multiple points of a customer's journey.

6.5.1 Needs may be identified by, but not limited to, the following people:

- Customers or their representative
- A family member or carer
- Any member of N&H or Hull CC staff
- Any member of a contractor's staff when working on behalf of N&H or Hull CC who are in contact with, or are contacted by the customer
- A referral from an external agency / organisation
- A local Councillor or M.P.
- The Housing Ombudsman

### Representatives and Advocates

6.6 Customers can choose to appoint a relative, friend or other representative such as an advocate or local ward member to be able to speak to N&H and act on their behalf in relation to N&H services including but not limited to:

- Their rent account including any rent arrears
- Another part of the housing service such as tenancy support
- A housing application
- Reporting a complaint on their behalf
- Customers can also choose to have their correspondence sent to their appointed person, subject to meeting data protection requirements.

6.7 In such cases third party consent for a representative or an advocate is required.

6.8 Information is key to developing and providing routine service delivery by design. Providing human-centric, accessible services to ensure that everyone can fully participate in and benefit from services regardless of their specific needs and vulnerabilities is based on identified vulnerability information

### THEME 2 – Effective Recording and Use of Customer Data – (Record)

6.9 Information and data are the key to being able to provide services that meet customer's needs. Information and data may not be relevant to all staff; however, it is important that all staff recognise the value of information and data to N&H.

6.10 All N&H staff have a responsibility to accurately record information on a customer's needs and vulnerabilities after they have been identified onto the appropriate IT system either doing this



themselves or requesting others do so, this is regardless of if they will use this information and data in the job role.

- 6.11 Documentation that supports the identification of a customer's needs and vulnerabilities will be stored securely on N&Hs document management systems.
- 6.12 Most needs and vulnerabilities can be a fluid state and may change over time. N&H staff will conduct reviews of needs and vulnerabilities and ensure they are relevant and kept up to date.
- 6.13 All personal and sensitive information, however received, is treated as confidential. This includes anything of a personal nature that is not a matter of public record about a customer.
- 6.14 N&H will ensure that they only involve other agencies and share information where there is a legal basis for processing the information.
- 6.15 N&H will only disclose information to third parties once we have the consent to do so, unless there are safeguarding concerns which override this.

#### THEME 3 - Responding to Customer Needs (Respond)

- 6.16 Providing human-centric, accessible services to ensure that everyone can fully participate in and benefit from these services regardless of their specific needs is done by providing both proactive and reactive services.
- 6.17 The provision of proactive services that are based on reasonable adjustments and specifically for some, must be the basis of N&H's service provision.
- 6.18 As part of N&H routine service delivery it already provides a significant response to customers through both proactive reasonable adjustments and reactive dedicated support and support services, as well as having robust safeguarding processes.
- 6.19 Proactive reasonable adjustments ensure all specific needs and vulnerabilities can be met on a day-to-day basis.
- 6.20 N&H want every tenancy to thrive and provides human-centric, accessible services to ensure that everyone can fully participate in and benefit from these services regardless of their specific needs and vulnerabilities.

## 7. Delivery of the Strategy

### Support Services

- 7.1 N&H have continually realigned our services to ensure customers are at the heart of our activities and already provide a range of dedicated support, and support services for tenants to help them manage their tenancy.
- 7.2 The Tenancy Sustainment Team: which can provide help to manage tenancies, especially for those tenants with specific needs and vulnerabilities. The ways in which the Team can support tenants and those who reside with them include:
  - Helping the tenant to settle into their tenancy
  - Settling into the neighbourhood
  - Using local services
  - Benefits advice
  - Advising on employment and training opportunities
  - Helping to develop the skills a tenant needs to live independently
  - Managing money, including any debts
  - Accessing sources of financial support



- Understanding and keeping to the Tenancy Agreement

7.3 Any tenant struggling to maintain their tenancy may self-refer or might be identified by any N&H staff member or its partners and will be supported by their Tenancy Officer who will assess both the situation and the specific needs/vulnerabilities of the tenant and those who reside with them, to understand what support can be given.

#### Making External Referrals and Signposting

7.4 N&H make referrals (including safeguarding referrals) to a range of external agencies and signpost customers on to other Hull CC services and where required N&H will work with these services to meet customer specific needs and vulnerabilities. These services might include but are not limited to:

- Adult Social Care
- Citizens Advice Bureau
- Children's Social Care
- Debt advice and welfare benefit services
- Domestic abuse services
- GPs and health visitors
- Health professionals and health visitors
- Mental health services
- Neighbourhood Nuisance Team
- Occupational health services
- Substance misuse services

7.5 N&H will ensure that it proactively attends and participates in key multi-agency meetings to ensure it has strong and relevant local connections. N&H representatives will regularly attend multi-agency meetings. Where N&H have a particular concern relating to vulnerabilities, it may coordinate a multi-agency case conference, to ensure a coordinated approach.

#### Policies & Procedures

7.6 Effective Policies and Procedures are essential in the management of vulnerability as they provide a structured, consistent framework for identifying, mitigating, and responding to risks, thereby protecting people and data.

7.7 N&H shall ensure appropriate Policies and Procedures specifically relating to vulnerability are in place, and those existing are periodically reviewed. This includes but is not limited to:

- Vulnerability Strategy & Reasonable Adjustment Policy
- Reasonable Adjustment Procedures
- Personal Information Alert Procedures

7.8 Wider Policies and Procedures when developed/reviewed shall also capture how it can accommodate the needs of vulnerable residents.

#### Data and IT Systems

7.9 In order to meet Theme 2 – Effective Recording and Use of Customer Data N&H shall:

7.9.1 Review the vulnerability information N&H currently collect and hold, to ensure collection of the correct information and that staff can access the information relevant to them.

7.9.2 Review how N&H report on information and use this to tailor its services.

7.9.3 Ensure the necessary data fields are available within its IT system to effectively record specific requirements. Also, ensuring that that N&H staff are proficient in using the IT system, with regular refresher sessions provided to keep staff up to date with system changes.



- 7.9.4 Ensure accuracy of data by undertaking a data cleansing exercise of vulnerability information currently held. This in turn shall increase the level and quality of information and data that we hold and capture on protected characteristics, specific needs, and vulnerability
- 7.9.5 Implement a mechanism for updating this data and using automation to support this wherever possible
- Training
- 7.10 Staff develop and deliver human-centric, accessible services. Trained staff are N&Hs greatest resource, possessing the skills, knowledge, passion, and motivation essential for innovation, problem-solving, and operational success.
- 7.11 To support this, a suite of mandatory training shall be developed which shall be proportionate to the job role to:
- 7.11.1 Provide an awareness of protected characteristics, specific need, and vulnerabilities
- 7.11.2 Equip staff with the necessary skills to identify vulnerabilities and assess information received to decide as to any immediate action that may be required by self or others
- 7.11.3 Direct staff on how to record that information and how systems can be used to support an improved customer experience
- 7.12 To further aide the embedding of this Strategy and ensure we respond in a positive way to our customers, delivering human-centric, accessible services proposed 'Culture Programme' and 'Values and Behaviour' training shall be rolled out during 2026/2027.
- 7.13 Contractors and others delivering services on behalf of N&H will also be offered access to training and / or be expected to ensure that their staff can recognise and respond appropriately to customers protected characteristics, specific needs, and vulnerabilities.
- 7.14 As part of this strategy and any related Policies and Procedures, an assurance framework and key performance indicators shall be developed, implemented, and monitored on an ongoing basis. This will allow N&H to review the services it provides and help N&H identify whether there are any wider steps that it can take to improve its services.
- 7.15 The effectiveness and outcomes of the Vulnerability Strategy will also be reviewed through feedback from customer satisfaction surveys completed, complaints and any other sources where customer vulnerability information has been captured. Feedback will be used to shape and steer the next review of the Strategy.



## 8. Compliance, Monitoring and Impact Assessment of the Change

- 8.1 Actions taken in relation to specific needs and vulnerabilities, should always be appropriate to the individual. They should not discriminate (either directly or indirectly) based on any protected characteristic.
- 8.2 N&H will ensure that it addresses barriers to support / adjustments for those with protected characteristics, who may also identify as having specific needs or are vulnerable.
- 8.3 N&H will aim to take an intersectional approach when working with people with specific needs or who are vulnerable. Intersectional approaches offer a way to understand and respond to the ways 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 vulnerability but also resilience of an individual or household.
- 8.4 An EIA of the Strategy will be used to guide actions.
- 8.5 This Strategy will be reviewed every five years unless there are significant changes to legislation or regulation or, where there are changes to best practice identified. If this occurs, an immediate review will be initiated.
- 8.6 This Strategy will be communicated internally to staff. Key stakeholders and key staff where this policy has specific impact will be briefed individually or collectively as required.
- 8.7 Performance against this Strategy will be reported to the agreed appropriate forums



