



Vulnerability policy

1.0 Purpose and scope

The purpose of this policy is to set our high-level position around tailoring our services to meet individual needs and respond to identifiable risks.

We are aware of the impact that housing can have on health. That is evident in many of the service requests we receive. We understand that our role as a landlord to provide good quality homes that allow our residents to live well requires a dynamic approach.

The aim of this policy is to:

- Set out how we recognise and uphold the legal housing rights of our residents, specifically how we respond to requests for a 'reasonable adjustment'
- Outline how we further consider additional needs not covered by legislation, in line with best practice
- Demonstrate transparency around the support residents can expect from us

We strive to develop a culture where staff can confidently and sensitively respond to the diverse needs of residents. This policy does not set out all the different ways in which we might tailor a service we deliver. Instead, it highlights our over-arching commitment to maintaining fairness and inclusivity in delivering services to our residents, ensuring transparency and accountability. Examples of how housing management services can be tailored are set out in relevant policies.

This policy applies to all households living in properties that we own or manage.

This document should be read in conjunction with our [Equality, Diversity and Inclusion Policy](#).

2.0 Defining vulnerability

We recognise that not every individual who is protected by the Equality Act has additional needs related to housing. Personal or health factors may have no bearing on a resident's ability to sustain their tenancy or request a service. The severity of a vulnerability can also fluctuate. It can have a long-lasting impact, deteriorate over time or may only temporarily arise when an external factor renders a person vulnerable.

Here we have adopted a fluid definition of the term **vulnerable*** that is situation-based:

A vulnerability arises when a housing issue disproportionately impacts a customer due to their personal circumstance or characteristic (either protected or un-protected). As a result, we provide additional support or a quicker response to ensure they are not disadvantaged.

Examples of **housing issues** include housing costs, property conditions, including lack of heating or hot water, safety.

Examples of a **personal circumstance** include experience of homelessness, experience of domestic abuse or violence, alcohol/drug dependency, or financial security, digital access, a short-term health issue.

Protected characteristics are listed under the Equality Act 2010. They include age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation.

Examples of **unprotected characteristics** include carer status, socioeconomic class, education, height, weight.

*The term 'vulnerable' can also be employed in a specific, statutory context. For example, the term 'vulnerable' in statutory 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 supersede the definition set out here.

3.0 Identifying vulnerability (Recognise)

While the definition of vulnerability used here is situation-based, we proactively seek to prevent or mitigate any increased risk to residents with additional needs.

Through all interactions and touchpoints during a customer's residency, including at the beginning of their residency, we ask them whether there is any information about them or anyone in their household that they believe it is important that we should be aware of. This allows us to mitigate any increased risk that a housing issue may have to the person's wellbeing should it arise.

Our programme of annual visits to each rented home gives us a routine opportunity to ask residents if they would like to share any information with us. This also provides us with the opportunity to update information previously provided, in recognition that a residents' individual circumstances might change. Where we have been informed about a long-term health impact or disability, we do not ask residents to update us on their circumstances.

We have incorporated other proactive measures to prevent risks, such as conducting regular wellbeing checks in care and support schemes.

Staff are also alert to any additional needs and will advocate for a quicker or adapted service where they suspect a person is vulnerable.

In specific circumstances, we will request evidence of any additional needs, usually in the context of lettings, where a transfer is required on medical grounds. Where we provide support for tenancy sustainment, for example support with a housing benefit application, we may also ask the resident to provide us with relevant information.

We recognise the important role that advocates can play in supporting vulnerable residents to ensure 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 our [safeguarding policy](#).

4.0 Addressing individual needs (Respond)

Consideration of vulnerability underpins all the services we deliver. We are clear that a person who is struggling with a housing issue can always contact us for support.

We anticipate diverse needs by completing a diversity and inclusion assessment for each housing management policy. This assessment considers the actual or potential impact a service might have on different groups and uses insight from complaints and best practice reports to highlight common issues and propose solutions. We use the outcome of these assessments to shape communication, procedures and guidance so that both staff and customers are clear about the support available before having to request it.

Specific examples of how we adapt services are provided in housing-management specific policies. As a set of general principles, we consider the following factors when determining how to tailor services:

- The impact a housing issue is having on an existing vulnerability: to what extent a housing issue is a contributory factor to or exacerbating an existing circumstance
- How a housing issue might be the sole cause of a vulnerability: usually a physical or mental health condition, some issues themselves give rise to a vulnerability
- How the risk to safety a housing issue might pose might increase due to a person's vulnerability

We do not complete a detailed vulnerability assessment; where the needs of a person are severe and complex, we work with social services and external agencies to determine what level of support might be required.

We are clear and realistic about the way in which a service can be optimised to meet the needs of a resident.

If a resident would like to nominate a person to act on their behalf in their relationship with Notting Hill Genesis, also concerning repairs, they can do so by following the process outlined here: [Authority of representation](#).

5.0 Reasonable adjustments

In addition to informing us about any additional needs, residents can make a formal request for a reasonable adjustment to their local officer.

A reasonable adjustment is a physical change to premises or a change to how we deliver a service to ensure a person with a disability is not disadvantaged. A reasonable adjustment can be a one-off request or a change to how we regularly deliver a service. An adjustment can be short-term or long-term.

In considering whether a request is reasonable, consideration is given to the following:

1. Effectiveness: the adjustment should fully address the resident's need.
2. Practicality: we must be able to practically make the adjustment
3. Resources: how much staff time and how much the adjustment will cost

We have clear procedures in place that staff must follow when assessing whether a request is reasonable. Residents will receive a formal response to their request.

6.0 Record keeping and monitoring (Record)

Diversity data

We are careful and concise in our record keeping, making sure that diversity data is not stored on a resident's file. As this data is used for research purposes only, it is anonymised.

This includes information about disability and age, which we will also ask about in the context of service delivery.

Other information

Where a resident provides us with information on the basis of it being used to inform how we deliver our services, this is recorded on their individual account and reviewed ahead of all interactions that it affects. Sensitive data, such as specific health conditions, is never shared with contractors. Instead, we provide contractors with instructions on how to tailor the service, for example, by giving the resident time to answer the door.

Monitoring

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 potential requirements. (See section 3).

We also rely on residents to keep us informed about any changes to the household's circumstances. We dynamically review our records once we are alert to a change in circumstances.

7.0 Complaints

Complaints about discrimination or failure to recognise vulnerability are responded to in line with our [complaints and compliments policy](#), as well as our code of conduct. If appropriate, the disciplinary policy will also be followed and working within the requirements of data protection, the complainant will be given a comprehensive response as to the outcome of the complaint.

8.0 Reference

The following legislation and regulatory standards are relevant to this policy:

- Under the Equality Act 2010, NHG has a duty to “advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it”
- The Social Housing Regulator’s Transparency, Accountability and Information Standard requires 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’.

The following procedures are relevant to this policy:

- [Reasonable adjustment procedure](#)

Document control

Author	Iona McHugh, Policy Manager
Approval date	2 April 2024
Effective date	13 June 2024
Approved by	Policy Group
Policy owner	Managing Directors of Operations

Version Control

Date	Amendment	Version
13/06/2024	New policy published.	1.0
21/10/2024	Statement added around authority of representation.	1.1