



**Green  
Square  
Accord**

# **VULNERABLE CUSTOMER POLICY**

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Quality and Compliance**

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## 1. Our purpose

We're proud to be able to support tens of thousands of people across England by providing affordable housing and care to help people live independently.

Everything starts at home, and we are privileged to be able to do work which makes a real difference to the lives of people in our communities. Everything we do is about people – whether that's providing a good quality, safe home or providing care which helps someone to live an independent life.

We live and breathe this social purpose.

## 2. Introduction

- ◆ We know some of our customers will have vulnerabilities which may impact how they are able to manage their home, tenancy or engage with their community. And we recognise customers can become vulnerable for many different reasons during their tenancy and may need more help from us to support their needs.
- ◆ We also recognise that low-income households are becoming more vulnerable as they deal with the stress of trying to manage their finances against a backdrop of increasing basic living costs and cuts to Universal Credit. For many, this pressure and worry will also have a damaging effect on their resilience levels and general health and wellbeing.
- ◆ As part of our Simpler, Stronger, Better business strategy; we are committed to ensuring tenancy sustainment sits at the heart of our customer offer. Our aim is to prevent a tenancy from coming to a premature end by providing the necessary information, advice and targeted support to those customers who need it most. This will be underpinned by a review of the

quality of customer data we hold, the creation of a tenancy sustainment fund and extending our range of resources to support customers with the greatest need. Alongside this we are also refreshing our community investment strategy to focus on our communities and localities and strengthen our locality model.

- ◆ We always aim to respond flexibly to customers who are vulnerable, and we have already invested in our own in-house tenancy support services to provide enhanced support for those customers who need additional help to manage and sustain their tenancies. Our cost-of-living hub has also been developed to provide information and signpost customers to a wide range of support and assistance available including financial, mental health and job seeking.
- ◆ We know there is more we can do, and this policy helps to ensure we are fair, clear, and consistent in our approach to vulnerabilities.
- ◆ The aim of this policy is to establish a framework and set of objectives to ensure we take a more consistent approach in how we understand and support customers and future customers who are vulnerable.
- ◆ Our objectives are:
  - To have a clear approach to vulnerability across GSA and understanding of vulnerability to help standardise our approach and ensure consistency when providing services to all customers.
  - To improve the way, we identify vulnerable customers and record vulnerabilities to ensure the timely and meaningful provision of support and guidance to help customers sustain their tenancy and access our services.
  - To assess our services and operational procedures to identify where we can apply further flexibility and prioritisation for vulnerable customers, including the provision of tailored services that meet their needs where appropriate.
  - To improve the way we collate, monitor and report on data and information on vulnerabilities to ensure we continuously drive service standards and improvements to maximise equal access to our services.
  - To help customers understand what vulnerability may look like for them and how they can access additional support.

### 3. Scope of Policy and Exclusions

- ◆ This policy applies to all our customers and members of their households.
- ◆ Where there is a risk of harm to adults or children who are experiencing, or are at risk from, abuse or neglect, we will follow our safeguarding policies and procedures.
- ◆ Additional arrangements will be in place across care and support services, to provide specialist support services in line with customer needs and contractual requirements.

## 4. Definitions

- ◆ It can be difficult to identify someone who is vulnerable and to what extent they need support as vulnerability is fluid and a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic violence, and poverty.
- ◆ Some of these factors are constant and some can occur because of a life event that does not necessarily remain a permanent state. Anyone can become vulnerable at any time, and the vulnerability may be permanent, temporary, or sporadic and could also be situational. It's essential to consider any and all factors to understand how they contribute to how vulnerable a person is at any point in time and how much additional assistance they may require in sustaining their tenancy.
- ◆ An individual's ability to act, engage or cope with everyday activities varies and is also an important factor in considering vulnerability. For example, many older people or those with disabilities are very independent and active and often do not need any additional assistance to sustain their tenancy and remain independent.
- ◆ Many definitions of vulnerability have been considered by our Customer Panel and our colleagues who agree our policy should align with the following:  
***'Customer vulnerability is fluid and dynamic, and consumers can move in and out of periods of vulnerability. A customer's circumstances – for example, going through a bereavement – can make them more vulnerable at a given time'.***
- ◆ More specifically we define a vulnerable customer as someone who: Has a protected (particular) characteristic and/or condition and/or circumstance that puts them or their household at risk of losing their tenancy, or any situation which, without support or intervention, place them at risk of abuse, neglect or causes detriment to their overall wellbeing.
- ◆ Vulnerability not only includes those who may be considered as vulnerable for the purposes of those in need of our community care and support services but also extends to customers who experience difficulties with everyday living and/or need additional support to meet their obligations under their tenancy.

### Protected Characteristics

- ◆ Under the Equality Act 2010, we may be considered as exercising a public function in the provision of our services and so have to "in the exercise of our functions, have due regard to the need to: (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;"
- ◆ The protected characteristics are age, disability, gender re-assignment, marriage & civil partnership, race, religion or belief, sex and sexual orientation.

- ◆ While we do not necessarily define all people with a protected characteristic as ‘vulnerable’, for the purposes of this policy, we will give due consideration to any protected characteristics in deciding any enforcement action under the terms of a tenancy or lease to avoid any inadvertent discrimination.
- ◆ In managing tenancies and leases and delivering services such as our repairs service, we will consider whether our decision would have an unfair or disproportionate impact on the customer compared with another customer who does not have a protected characteristic.
- ◆ In particular, where possession action is being considered, we will ensure pre-action consideration is given to:
  - Whether the customers’ behaviour, actions or lack of action is related to their disability.
  - Whether the behaviour is putting the health and safety of others at risk, neighbours for example.
  - Alternatives to possession action and why they were not suitable.
  - Whether possession action is justifiable and a proportionate means of achieving a legitimate aim and whether the effect on the occupier is outweighed by the advantages of our action.

## 5. Roles and Responsibilities

- ◆ It is the responsibility of all colleagues, managers, committee, and board members to be aware of how vulnerability might act as a barrier to customers accessing and receiving services, and to identify how their operational areas or function can be improved to meet the needs of vulnerable people.
- ◆ Overall responsibility for this policy lies with Operations Directors. However, all Heads of Service and Departmental Managers are responsible for the application of this policy at an operational level and must ensure the policy objectives have been considered when reviewing or developing customer facing service-related policies and procedures.
- ◆ All colleagues are required to apply this policy as part of their role.

## 6. Policy

### Policy Statement

- ◆ One of our principal purposes is to provide housing for people in housing need and to create stable and sustainable communities where people want to live. To maintain balanced and sustainable communities we believe a strong community benefits from the inclusion of, and responds to the needs of, all its members, including those who are vulnerable.
- ◆ Whilst our customers have an obligation to fulfil the conditions of their contractual agreement, being vulnerable does not mitigate a customer from these responsibilities. We do recognise some customers will require additional support in meeting their obligations and

we must be able to provide enhanced support to help vulnerable customers to sustain their tenancies, as well as allowing them to be supported by a representative or advocate in interactions about our services.

- ◆ This policy demonstrates our commitment to supporting vulnerable customers and it is the responsibility of all colleagues to be aware of how vulnerability might act as a barrier to customers accessing and receiving services, and to identify how their own area or function may be improved to meet the needs of vulnerable people.

## Policy Outline

- ◆ This policy has been developed with our Customer Panel and colleagues to provide a framework which sets out our commitment to supporting vulnerable customers.
- ◆ This policy will help us to ensure:
  - Compliance with all legal and regulatory requirements and standards.
  - Equality of the customer experience for all customers and that no one is disadvantaged because of their vulnerability.
  - Increased awareness and understanding of vulnerability across the business with colleagues taking this policy into account and applying its principles when developing strategies, policies, and procedures for their own service areas.
  - We take into consideration individual circumstances in the provision of services, and we do not apply blanket policies when decision-making.

**Objective 1:** To introduce a new working definition of a vulnerable customer and improve colleagues' awareness and understanding of vulnerability to help standardise our approach and ensure consistency when providing services to customers with additional needs. We will ensure all colleagues are made aware of this policy and our new working definition through a campaign and official launch of the policy endorsed by our Executive, Board, Operations Committee and our Customer Panel

- ◆ We will embed our approach by equipping all colleagues with the necessary skills, knowledge, guidance, and tools to deal effectively with the multiple factors of vulnerability, so they feel able to respond positively and appropriately to vulnerable customers' needs.
- ◆ We will provide mandatory training in Safeguarding, Equality in the Workplace and Unconscious Bias.
- ◆ We will ensure 'front line' colleagues are empowered to be flexible in how they provide services, to best support vulnerable customers.

**Objective 2:** To improve the way we identify vulnerable customers and implement a standardised approach to assessing, and recording vulnerable customers so that we can provide timely and meaningful support and guidance to help a vulnerable customer sustain their tenancy.

- ◆ We will identify vulnerability as early as possible together with appropriate support mechanisms and/or ways we can adapt our service to meet the needs of our vulnerable customers.
- ◆ We will listen to what customers tell us about their needs and be guided by them and consider how services could be delivered, taking their vulnerability into account.

- ◆ We will record our decisions and the reasons for them in customer's individual records.
- ◆ We will carry out a Housing and Support Needs Assessment (HSNA) for all new customers, using this to guide and improve the services we deliver to them. Where this demonstrates a vulnerability issue, we will review this annually, or as requested by the customer, or where events indicate a customer may have become more or less vulnerable.
- ◆ We will review our service offer with existing customers when they tell us they have a vulnerability; this includes but is not limited to our services for repairs, property improvements, tenancy management, rent payments and complaints.
- ◆ We will use all available information to identify if a customer is vulnerable and record any vulnerabilities on a customer's contact record and keep this up to date.
- ◆ We will obtain a customer's permission before we talk to other organisations about them or on their behalf unless we have a duty to share information.
- ◆ We will record any known representatives who act as a 'delegated authority' or with power of attorney to act on the customers behalf.
- ◆ We will raise safeguarding concerns with relevant local authorities in line with our Safeguarding Policy which sets out how we identify and support vulnerable adults and children at risk, and ensure statutory agencies are involved immediately if we have a concern.

**Objective 3:** To assess our services and operational procedures to identify where we can apply further flexibility, variances, or prioritisation for vulnerable customers, including the provision of tailored services that meet our residents' and customers' needs, where appropriate.

- ◆ We will undertake screening assessments for all services. Where the screening assessment indicates a full assessment is necessary and/or advisable, we will carry out a full impact assessment and understand the importance and positive influence these assessments can have.
- ◆ We will consider possible adjustments to our standard services due to customer's individual circumstances and vulnerabilities and ensure any changes we make are reasonable and appropriate. In all cases we will record our decision making. This may include ensuring appropriate provision of translation services or written communications available in chosen languages. Please refer to the Reasonable Adjustments Policy.
- ◆ We will consider any additional needs due to vulnerability and where appropriate vary our service delivery to ensure vulnerable customers receive the same level of service.
- ◆ We will review our services and operational procedures to identify where we can apply further flexibility, variances, or prioritisation for vulnerable customers.

**Objective 4:** Improve the way we collate, monitor and report on data and information in relation to vulnerable customers to ensure we continuously drive service standards and improvements to maximise equal access to our services.

- ◆ We will review how we capture details of customers vulnerability in our systems and ensure colleagues who need access to this information can do this.
- ◆ We will instigate measures to increase the level of vulnerability data we record on customer records.
- ◆ We will ensure we have the necessary data fields to record specific requirements relating to vulnerability.



**Objective 5:** To help customers understand what vulnerability may look like for them and how they can access additional support.

- ◆ We will let customers know what types of support we can provide and other external support which may be available.
- ◆ We will signpost and assist customers to obtain support available from both internal and external sources.
- ◆ We will allow vulnerable customers to be supported by a representative or advocate in interactions about our services.
- ◆ We will assist vulnerable customers in accessing additional support through our own Tenancy Sustainment and Money Advice Services or referrals to other external partner support agencies where appropriate

## Policy Requirements

- ◆ The requirements of this policy will be summarised in an appended procedure to this policy.

## 7. Reporting and Monitoring

- ◆ This policy will be reviewed every three years, unless legislation, business or sector developments require otherwise, to ensure we can continue to meet the objectives and take account of good practice developments.
- ◆ We will monitor the effectiveness of this policy by regularly reviewing:
  - The number of evictions, abandonments or otherwise failed / failing tenancies involving a vulnerable person or household.
  - The number of cases of anti-social behaviour or harassment involving a vulnerable people (either as victim or perpetrator).
  - Feedback we gather on Tenancy Sustainment case work and experience of using our Aids & Adaptations service.
- ◆ Our annual assessment of compliance with the Regulator of Social Housing consumer standards is a further test that we are meeting our responsibilities to vulnerable customers.

## 8. Assurance

### Internal Audit

- ◆ Adherence to this policy will be assessed, annually as part of an internal assessment of our adherence with regulatory standards, with assurance being provided to the appropriate Committee.
- ◆ In addition, line managers will ensure regular spot checks are carried out to identify and remedy any issues.



## External Audit / Validation

- ◆ Adherence to this policy may be audited / validated by the following external bodies.
- ◆ Regulator of Social Housing through any regulatory inspection

## Service Standards

- ◆ Customers will be involved in developing service standards and in monitoring and scrutinising performance; this is led through the locality working groups and Customer Panel.

## 9. Equality Impact Considerations

- ◆ This policy will be applied to ensure that all our customers have a fair and equal access to our services, and it does not discriminate against any protected group.
- ◆ An Equality Impact Assessment has been completed and the outcome of the evaluation is that this policy has no significant negative impact on any group of customers who have a protected characteristic. The likelihood and any impact felt by customers will continue to be assessed as part of the policy's monitoring and reporting.
- ◆ We will always consider a customer's vulnerability, circumstances and information given to us when determining our speed of response.
- ◆ When considering possible adjustments to our standard services due to customer's individual circumstances and vulnerabilities, we will ensure any changes we make are reasonable and appropriate. In all cases we will record our decision making.
- ◆ We will also ensure customers have fair access, which suits their individual needs. This could include providing translations for community languages and additional support for customers who have difficulty reading and writing when required for example.
- ◆ This policy is essential to ensuring we promote equal access to our services as it outlines our approach to identifying customers who are vulnerable and our response across a range of services.
- ◆ It will help us to develop a better understanding of our customers' needs.
- ◆ It will ensure no person or group of persons will be treated less favourably than another person or group of persons on account of any diversity strand or protected characteristics.
- ◆ We will make reasonable adjustments as necessary to ensure that all customers are not disadvantaged by reason of any protected characteristic under the Equality Act 2010.

## 10. Data Protection Considerations

Ensuring we maintain records relating to vulnerability is important in meeting customer needs. However, this data may also be sensitive and needs to be handled appropriately.

The development of any new or updated data fields in our housing management or care management systems will be subject to appropriate data controls and new DPIA's will be completed where there are any significant changes to our systems.

## 11. Training and Competency

- ◆ All colleagues will receive adequate training in the use of policies, documentation, systems, and records required as part of their role. Meeting the needs of customers who may be vulnerable is mandatory for all operational colleagues, as is additional learning on mental health, learning disabilities, dementia and sensory needs. Induction, supervision, and appraisal processes will be used to monitor colleagues understanding and compliance with expectations and we will also explore ways of checking colleagues' knowledge and understanding on an annual basis.
- ◆ Where data anomalies indicate, changes are needed to training programmes, changes will be made to reduce the risk of recurrence and ensure expected standards are clear.

## 12. Communication and Implementation

- ◆ Line managers will ensure this policy and any team responsibilities are communicated appropriately and reflected in meetings and performance reviews, and are included in departmental business plans, standard operating procedures, contingency plans, and strategies. Any updates to the policy will be shared with colleagues; for operational colleagues, this will be included in the monthly briefing on policy and procedure changes, and cascaded through meeting structures.
- ◆ Where policy reviews, audits or performance indicate the need for whole-scale change, then a fit-for-purpose implementation project plan will be produced and delivered.

## 13. Legal and Regulatory Framework

- ◆ All public authorities, or bodies exercising public functions (which includes us for certain services), must act compatibly with **The Human Rights Act 1998**. The human rights most relevant to housing are the right to respect for private life, family life and the home, right to a fair trial and the prohibition of discrimination. This means that we must act in a legal, fair, transparent, and proportionate way in line with our own policies. It is important, however, to avoid applying 'blanket' policies and we must allow individual circumstances to be considered in our decision-making, particularly in relation to vulnerability. The ability to take account of individual circumstances will be an important consideration in undertaking impact

assessments, when developing or reviewing our strategies, policies, procedures, or functions.

- ◆ We have a duty under the **Equality Act 2010** to “advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it” (see Section 7 on Protected Characteristics) but as a social landlord we recognise many other customers can be vulnerable for reasons other than the characteristics protected under the equalities legislation, and this policy sets out how we define vulnerability and how we aim to respond to those customers’ needs.

**The Social Housing Regulator’s Transparency, influence and accountability Standard (2024), part of the Consumer Standards** states “tenants and prospective tenants should be treated with fairness and respect” and “registered providers should consider how they can adapt their services and communications to meet individual tenants’ needs” with consideration being “integral to the culture of the organisation”. **In relation to the housing and landlord services they provide, registered providers must take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants.**

- ◆ **Pre-Action Protocol for Possession Claims by Social Landlords (2015)** sets out the requirements that a Registered Provider of Social Housing must have either considered or complied with in relation to possession proceedings. To encourage more pre-action contact and exchange of information between landlords and tenants; enable the parties to avoid litigation by settling the matter if possible; and to enable court time to be used more effectively if proceedings are necessary.

Courts will take into account whether the protocol has been followed when considering what orders to make.

If we are aware the customer has difficulty reading or understanding information, we must take reasonable steps to ensure we have communicated appropriately, and the customer understands any information we have given.

When a tenant is under 18, or particularly vulnerable, we need to consider at an early stage:

- Whether the person is likely to have mental capacity to defend the proceedings (if not we should make an application for the appointment of a litigation friend)
- Whether or not any issues are likely to arise under the Equality Act 2010 (e.g., possibility of tenant with a disability, which includes mental health issues, making a disability discrimination claim).

- ◆ **The Housing Ombudsman Complaints Handling Code 2020** states landlords should “comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs. Landlords shall have a reasonable adjustments policy in place to address this”.

## 14. Information Sharing and Confidentiality

We will provide information as required in line with relevant law and regulation.

We collect information (personal data) to enable us to:

- ◆ manage and support our relationship with customers to comply with legal obligations
- ◆ improve our services
- ◆ achieve our legitimate business aims

We are committed to complying with data protection legislation when handling data.

Customers have rights including access to their data and to object to the way it is processed. For more information on how and why we process customer data and how customers can exercise their rights please view our full Privacy Policy on our website at [Privacy notice – GreenSquareAccord](#).