

# Vulnerability Strategy

2025-2028





# Action Plan - Year One

1. Understanding and identifying vulnerability				
Action	Detail	Timescale	Lead	Monitoring arrangements
Use Project Synergy as an opportunity to review how vulnerability data is recorded on our housing management system	Review vulnerability classifications and communication preferences.	30/09/2025	Synergy Project Team/ Director of Customer Experience Director of Homes and Communities/ Director of Quality and Compliance	Team Data Stewards to monitor compliance with recording standards.
	Develop a procedure for the use of system markers that covers consent and data review/deletion.	30/09/2025		To be included in Vulnerability review to be completed by Operations Quality Team in October 2025.
	Ensure associated training covers how to use the system correctly with appropriate guidance.	30/09/2025		
Training on meeting the needs of customers who may be vulnerable	Complete roll-out of e-learning on meeting the needs of customers who may be vulnerable in housing or C&S.	30/06/2025	L&D/ Director of Quality and Compliance	Via L&D monitoring of Legal and Regulatory training and role-specific training. New course completion due by 30/6/25.  Compliance levels included in Vulnerability review to be completed by Operations Quality Team in October 2025

1. Understanding and identifying vulnerability <small>continued</small>				
Action	Detail	Timescale	Lead	Monitoring arrangements
Use touch points to check vulnerability data is up to date	Complete review of Call Centre scripts and processes to ensure data is checked at each call and consider use of automated options to update data for those able to use these.	30/09/2025	Director of Customer Experience / Head of Customer Experience	Progress/ completion to be monitored through Vulnerability review to be completed by Operations Quality Team in October 2025
	Review processes such as lettings, complaints and annual boiler checks to ensure there are processes in place to check on vulnerability or flag any issues. The use of systems solutions should be optimised where possible.	30/09/2025	DPS / Head of Heating	
	<p>Continue to review Tenancy Audit framework to ensure relevant updates are collected (with customer consent) and fed back into the HMS. The use of systems solutions should be optimised where possible.</p> <p>Ensure culture where all customer touch points are maximised to ensure:</p> <ul style="list-style-type: none"><li>▪ We know our customers</li><li>▪ We know our homes</li></ul> <p>This culture is wider than identifying vulnerability and extends to identifying issues that may impact customer wellbeing including: safeguarding, hoarding, health and safety concerns and domestic abuse.</p>	30/09/2025	Director of Homes and Communities / Head of Director of Homes and Communities	

2. Data and Analytics				
Action	Detail	Timescale	Lead	Monitoring arrangements
Data cleansing and data update.	In line with the Customer Data project and digital strategy, complete review of data to improve data quality and relevance.	(add links to other docs)	Director of Customer Experience / Head of Customer Experience	Through data workstream
Access to vulnerability data across systems	Complete review to ensure that information on vulnerability is shared appropriately through systems, while maintaining adequate access controls.	30/9/2025	Project synergy / Director of Quality and Compliance / Director of Homes and Communities	Data stewards to be identified.  Vulnerability review to be completed by Operations Quality Team in October 2025 to validate that systems are in place.
Automation of alerts	Review the possibility for systems to trigger alerts where contact points are missed or there is a change in patterns of customer behaviour that could act as an early warning sign that more support is required- e.g. reporting on missed visits; missed payments.	31/3/2026	BI team / Digital	
BI reporting used to measure equity of outcomes	Complete a baseline assessment of current functionality.  Consider how data in other systems (React/ SharePoint) can be linked to core data to measure outcomes by diversity strands/ vulnerability.	30/4/2025	BI team / Digital	Progress/ completion to be monitored through Vulnerability review to be completed by Operations Quality Team in October 2025
Using data to inform locality offers and inform local letting plans	We will use data to identify any pockets of vulnerability or specific needs, either in specific geographical areas, or in specific schemes.  We will use this information to inform our locality offers and local lettings plans.	30/09/2025	BI team / Digital / Homes and Communities	
Digital Access	Through the Digital Strategy, ongoing development to improve customer access channels and create a range of options to meet individual needs and preferences		Digital	Via monitoring of the Digital Strategy at IGG

3. Person-Centred Tailored Support				
Action	Detail	Timescale	Lead	Monitoring arrangements
Housing and Needs Assessments	<p>Complete a comprehensive review of Housing Support Needs Assessments (HSNA) across the business to ensure they are capturing information that can help us tailor our services more appropriately.</p> <p>Ensure all HSNA include appropriate information to customers about data sharing and use of personal information.</p>	30/9/2025	Director of Homes and Communities / Head of Localities / Head of Q&C	Progress/ completion to be monitored through Vulnerability review to be completed by Operations Quality Team in October 2025
Support in emergencies	Ensure emergency procedures (including evacuation/ decant) provide clear guidance on meeting the needs of those with additional support needs.	30/9/2025	Director of Homes and Communities / Head of Localities / Head of Q&C	Progress/ completion to be monitored through Vulnerability review to be completed by Operations Quality Team in October 2025
Reasonable Adjustments	Develop a clear procedure for Reasonable Adjustments that provides specific detail on how requests and decisions about reasonable adjustments should be recorded	30/9/2025	Director of Quality and Compliance	Progress/ completion to be monitored through Vulnerability review to be completed by Operations Quality Team in October 2025
Communication on additional support	Review how we publicise opportunities for additional support- to tie in with further agreement on workforce structures to support the needs of customers who may have additional or specific needs.	30/9/2025	Director of Homes and Communities / Head of Localities / Head of Q&C / Head of Comms	Progress/ completion to be monitored through Vulnerability review to be completed by Operations Quality Team in October 2025

4. Inclusive service design and workforce strategy				
Action	Detail	Timescale	Lead	Monitoring arrangements
Board session on vulnerabilities	<p>Scheduled for 14th May 2025, with a focus on:</p> <ul style="list-style-type: none"><li>Review and reflection on our self-assessment against the Housing Ombudsman spotlight report ‘Attitude, Respect and Rights- Relationship of Equals.’</li><li>The customer of the future and how we may need to change our strategic approach / delivery model to adapt.</li><li>To provide an overview of digital tools / data and how they can support us in making better decision making.</li></ul>	31/05/2025	Director of Quality and Compliance	
Outputs Review/ Next Steps	Paper detailing discussion and outputs to be shared at May Board Meeting	27/05/2025	Director of Quality and Compliance	
Increase scope of wider customer feedback on service design and approach	Put in place arrangements to customer views that reflects the diversity of customer needs; to include feedback on our approaches to increased self-service/ automation and increased tailored support for those who need it.	31/10/2025	Director of Quality and Compliance / Head of CE	Through annual reviews of customer engagement activity and thematic reviews of our approach to customer engagement. Through annual reviews of customer engagement activity and thematic reviews of our approach to customer engagement.
Explore the use of a lived experience panel when creating new services or testing existing services	<p>Increase opportunities to use customers with lived experience when developing policies or agreeing processes.</p> <p>Consider using customers with lived experience as part of our service review processes.</p>	31/03/2026	Director of Customer Experience / Head of CE / Director of Quality and Compliance / Head of QC	
Values-based recruitment and induction	To ensure models in C&S are replicated across the business and there is a clear focus on ‘recruitment for attitude.’	31/12/2025	DofP / Recruitment Manager	
Embedded training offer on vulnerability	Ensure planned and new courses on vulnerability and additional needs become embedded as part of the core training offer for identified audiences.	30/9/2025	L&D Manager / Director of Quality and Compliance	Monitored via KPI compliance.

4. Inclusive service design and workforce strategy *continued*

Action	Detail	Timescale	Lead	Monitoring arrangements
Review workforce structures in relation to meeting customers with additional needs and vulnerabilities- links to work on organisational design being led by the People Team in 2025/26.	<p>Review options for enhancing our approach to vulnerability and colleague access to more specialist advice and guidance.</p> <p>Options may include having vulnerability champions within teams are reconfiguring resource into a centralised team.</p>	31/03/2026	DoP / Director of Quality and Compliance and other relevant Ops Directors	

5. Partnership Working

Action	Detail	Timescale	Lead	Monitoring arrangements
Localised mapping of partnerships and key links	At a locality level, map out key partnerships and signposting opportunities.	31/10/2025	Director of Homes and Communities / Director of Care and Support / HoS	
Locality Based Community Partnerships and Investment Initiatives	Through our locality model, and links to social value, we are working to further develop local partnerships	01/10/2025	DHS / HoS	Through Locality Boards
Review of signposting information both on website and as available to local teams	<p>Produce clear signposting information, both on our website and available to email customers.</p> <p>Put in mechanisms to ensure details are reviewed at an agreed interval to ensure information remains up to date.</p>	30/09/2025	Head of Comms	Progress/ completion to be monitored through Vulnerability review to be completed by Operations Quality Team in October 2025

6. Monitoring and Continuous Improvement				
Action	Detail	Timescale	Lead	Monitoring arrangements
Review and update our vulnerability policy	Update vulnerability policy in line with feedback from HOS and to reflect changes in regulation.	31/03/2025	Director of Quality and Compliance	Via Vulnerability Review October 2025
Service review on approach to vulnerability scheduled for October 2025	As part of the Operations Quality timetable, a service review will be completed by the Quality Team in October 2024 and will be used to monitor progress on strategy objectives and actions.	31/10/2025	Director of Quality and Compliance / Head of QC	Compliance with review schedule, and key outcomes, reported to Operations Committee.
Approaches to vulnerability to be a cross-cutting consideration in relevant service reviews/ audits	As part of scoping for both Quality Team reviews, and internal audits completed by auditors (and where relevant to review type), we will consider opportunities and how well the system/ process under review meets the needs of customers with vulnerabilities.	01/04/2025	Director of Quality and Compliance / Head of QC / Head of Compliance (Governance)	
Use Evergreen and other reflective learning sessions to show commitment to reflective practice and appropriate follow-up action	Consistently use reflective learning sessions as an opportunity to learn from incidents where we there are opportunities to improve how we tailor services to individual needs.  Embed this approach across the business and evidence a commitment to openness and transparency.  Actively use sessions to drive forward improvement actions, ensuring agreed actions are monitored for completion.	01/04/2025	Director of Quality and Compliance	Progress/ completion to be monitored through Vulnerability review to be completed by Operations Quality Team in October 2025