

Vulnerability Strategy

2025-2028





Contents

Foreword	2
Introduction	3
The six pillars of our vulnerability strategy	4
Links with other strategies	8



Foreword

Our GSA business strategy ‘Simpler, Stronger, Better’ recognised that we needed to improve our customer offer and further bring to life our commitment to ‘our customer is everything’, as set out in the GSA Way. We had started to work on how we could make changes that put improved customer experience at the heart of everything we do.

On 23 January 2024, the Housing Ombudsman published its Spotlight report on the attitudes, respect and rights titled, ‘Relationships of Equals’. The focus of the report is on the meaning of vulnerability within social housing, and how social landlords could better support the needs of those tenants, and their household. It also encourages landlords to consider residents of the future and how services can be shared to meet their likely level of needs.

We define a vulnerable customer within our vulnerability policy as: ‘someone who has a protected (particular) characteristic and/or condition and/or circumstance which puts them or their household at risk of losing their tenancy, or any situation which, without support or intervention, places them at risk of abuse, neglect or causes detriment to their overall wellbeing.’ We recognise customer vulnerability is fluid and dynamic, and customers can move in and out of periods of vulnerability. A customer’s circumstances – for example, going through a bereavement or experiencing economic hardship can make them more vulnerable at a given time.

One of the recommendations from this review was for social landlords to implement a vulnerability strategy, including how it is defined, who assesses, and what the review process is. This must be in line with the Equality Act 2010, the Human Rights Act 1998 and the Care Act 2014.

Intrinsic to being able to meet the needs of customer with vulnerabilities is the effective use of data and, for this reason, this strategy is closely aligned with work to improve how we collect, record and use customer data. Equally, the underpinning drive to customer-centric provision reflects our wider customer strategy.

By ensuring we are offering a human-centric service, we can offer inclusive and accessible services that value individuals, their life experiences, and better support them within their homes. We will use all our contact points with customers to keep up to date with changing needs- for customers, this will mean we can tailor our services to their needs.

Introduction - every customer matters, every contact counts

At GSA we believe our customer is everything.

As a social housing, care and support provider, we recognise our duty to provide customer-focused services, that meet our customers' individual and diverse needs. This is a GSA-wide strategy that underpins all our work with customers and should be read in conjunction with the wider Customer strategy.

At times in our lives, any one of us can be vulnerable. Vulnerability is not something a person is but rather something that can happen to all of us during any time in our lives. People's needs change depending on not only their health and physical well-being but also depend on other things that are happening in their lives, or indeed previous experiences in their lives.

Our customers may need different levels of support, at different times. We need to ensure our systems and processes are flexible and inclusive to all. Customers will need different levels of help and support, and our services need to be able to adjust appropriately.

Key to being able to respond appropriately to customer needs, is knowing our customers, having clear records of their needs and keeping this updated. We support the NHF 'Make Every Contact Count' report. Making every contact count means using routine and planned interactions with customers as opportunities to gather information about both the condition of their homes and their needs. This information can be used to help us tailor our services more effectively and responsively. Making every contact count also includes identifying which customers have not been in contact with us, helping us to identify customers who may have issues that have not yet been addressed.

Every colleague and contractor must see it as a core part of their role and understand that they have a responsibility to update the data the organisation holds about the condition of homes and the wellbeing of customers.



The six pillars of our vulnerability strategy



**1. Understanding
and identifying
vulnerability**



**2. Data
and Analytics**



**3. Person-centred
tailored support**



**4. Inclusive service
design and workforce
strategy**



**5. Partnership
working**



**6. Monitoring
and Continuous
improvement**



1. Understanding and identifying vulnerability

Objective: to understand our customers and recognise where they may need additional support, or services delivered in a different way to better meet their needs.

What we will do

- Enhance and embed the understanding of vulnerability across our business.
- Ensure our workforce are suitably trained and equipped to understand and respond to the individual needs of customers
- Review systems and processes to ensure all customer touchpoints are used to identify changes in need and update our systems
- Encourage customers to share details of their needs, through fostering a culture where they recognise that this can help us tailor services more appropriately



2. Data and Analytics

Objective: to optimise the use of data in both recording, identifying and monitoring the diverse needs of our customers, allowing us to meet individual needs and better plan for the needs for customers in the future.

What we will do

- We will review how vulnerability data is recorded on our key housing management system (and accessible to those who need it), while ensuring full compliance with GDPR
- We will train colleagues how to consistently record information and use information to tailor services appropriately
- We will focus on updating and cleansing the data we hold to ensure it is accurate
- We will review our systems to ensure that key information is transferred between data systems, where necessary and appropriate
- We will use data to identify any pockets of vulnerability, either in specific geographical areas, or in specific schemes. We will use this information to inform our locality offers and local lettings plans
- As updated, we will use the data to both better understand current customer needs, and to predict the needs of future customers
- We will identify opportunities to ensure we can use triggers across systems to identify opportunities for well-being checks or early intervention (e.g. missed contact points; changes in patterns of payment etc.).
- We will use data to ensure we can assess and review if customers have equity of outcomes



3. Person-centred tailored support

Objective: to offer flexible support and services that can be tailored to individual needs

What we will do

- Embed a customer-centric culture that reflects a person-centred individualised approach and aligns with our wider EDI commitments
- Review our needs assessments to ensure that they are fit for purpose
- Use information from customers about their needs to work with them to tailor our services more appropriately
- Ensure that the need for additional support is provided where there is increased risk of harm; for example, during health and safety incidents or where a decant is required
- Ensure a clear framework for responding to requests for reasonable adjustments under the Equality Act
- Ensure we actively communicate with customers about the support that is available
- Offer clear processes to access additional support
- Undertake early intervention and prevention where possible
- Where customers are assessed to lack capacity to make particular decisions, work with other relevant parties to support actions in line with the customer's best interests.



4. Inclusive service design and workforce strategy

Objective: to offer services that are fair and inclusive and ensure our workforce strategy and design reflects this core principle

What we will do

- Complete a Board-level review of our mission statement, ensuring that customer centricity runs through all that we do and deliver
- Develop and implement services designed through consultations and feedback from our customers
- Ensure our service design reflects the diversity of customer needs, reflecting both approaches to increased self-service/ automation and increased tailored support for those who need it
- Explore the use of a lived experience panel when creating new services or testing existing services
- Ensure our approach is embedded through workforce strategies built on values-based recruitment and induction/ training programmes that enable and empower colleagues to meet individual needs
- Reconsider workforce structures to ensure additional support can be offered where necessary to customers with additional needs and vulnerabilities- this aligns to the review of organisational design, being led by the People Team in 2025/2026



5. Partnership working

Objective: to work in partnership with other agencies to support customers to meet their holistic needs.

What we will do

- Work with partner agencies to provide support and agree solutions that meet customers holistic needs, drawing on the expertise of specialists where needed to meet specific customer needs and vulnerabilities
- Support community-based initiatives that allow us to provide better services to customers
- Ensure effective safeguarding arrangements are embedded across GSA
- Ensure we have a wide range of signposting information available to customers



6. Monitoring and Continuous improvement

Objective: to continually monitor and review the strategy to ensure it is meeting customer needs and meets regulatory standards

What we will do

- Ensure our approaches meet legislation, regulation and best practice
- Complete regular reviews and monitor the effectiveness of the strategy
- Ensure the outcomes of these reviews are shared with customers in an open and transparent way
- Use reflective practice and learning to make any adjustments to our approach. This includes learning from complaints, safeguarding cases, or any adverse incidents impacting customers.

Links with other strategies

This strategy is closely aligned with other key strategies and operational plans, not notably our Customer Strategy and Digital operational plans. The diagram below shows the key principals of each strategy and how they interlink.

