Housing & Communities Directorate	bdht

1. Customer Vulnerability Policy

2. Reference Number 1.0

3. Statement of intent including cross-reference to bdht's corporate objectives

3.1 At bdht, our vision of *"Building Vibrant Communities Together;* is routed in the belief that everyone deserves to live in a safe, secure, and supportive environment, regardless of their ability, background or personal circumstances and can engage with our services confidently, comfortably and without barriers. The policy reflects our commitment to creating a fair, inclusive and respectful environment for all our customers. As a community-focused housing provider, we recognise that vulnerability can affect anyone at any time and that it may impact a person's ability to access services, manage their tenancy, or maintain their wellbeing.

3.2 This policy outlines bdht's commitment to identifying, understanding, and supporting vulnerable customers. It provides a framework for staff to deliver services that are inclusive, empathetic, and responsive to individual needs. We aim to ensure that vulnerable customers are not disadvantaged and that they receive the right support, at the right time, in the right way.

3.3 We understand that vulnerability is not always visible and may be temporary, fluctuating, or long-term. It can arise at any point in an individual's life, influenced by a number of factors. It is a dynamic state, requiring responses to be tailored to the individuals' circumstances and needs.

3.4 We recognise that individual challenges may present in a variety of forms and intensities, affecting customer's ability to manage their home or engage with their community. This policy is designed to provide appropriate and responsive support to address these needs.

3.5 Our person-centred approach is rooted in early intervention, partnership working, and a culture of care and respect, focussing on what individuals and communities can achieve rather than on limitations. By embedding this policy across all areas of our organisation, we aim to promote tenancy sustainability, prevent crisis situations, and contribute to the wellbeing of our communities.

3.6 We are committed to ensuring all staff, contractors and stakeholders recognise when a customer needs a more tailored response, including making reasonable adjustments where required to meet the needs of the individual. Training on this policy will be delivered to staff and contractors on an annual basis.

3.7 The policy will help to achieve the following corporate objectives:

- Be an Excellent Landlord
- Build and Support Vibrant Communities

4. Legal and Regulatory Requirements

4.1 Equality Act 2010 This Act protects individuals from discrimination and requires public bodies and service providers to make reasonable adjustments for people with protected characteristics, including disability, age, and mental health.

4.2 The Regulator of Social Housing (RSH) introduced the consumer regulatory standards, following the social housing white paper. The Regulator aims to drive improvements in the sector, particularly in the services offered to residents

4.2.1 Transparency, Influence and Accountability Standard (2024) Requires landlords to treat tenants with fairness, respect, and dignity. Landlords will understand and respond to the diverse needs of tenants, including those who are vulnerable. It promotes accessible communication and inclusive decision-making. Supports tenant participation in shaping services, policies, and performance monitoring. It ensures relevant information and data are used to understand tenant needs and assess whether services meet fair and equitable standards. Customers and prospective customers can involve a representative or advocate in interaction regarding landlord services.

4.2.2 The Tenant Involvement and Empowerment Standard outlines that Registered Providers should:

- “Treat all tenants with fairness and respect”
- “Demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.”

4.2.3 Housing Ombudsman's Complaint Handling Code is a statutory code which sets out how landlords should handle complaints, including those from vulnerable tenants. It ensures the complaints processes are accessible and fair and encourages learning from complaints to improve services for vulnerable groups.

4.2.4 Data Protection Act 2018 & UK GDPR These laws govern how personal and sensitive data (including vulnerability information) must be collected, stored, and shared. We are required to ensure that customer information is handled confidentially and only shared with consent or where legally required. It supports the ethical use of data to improve service delivery and safeguarding.

4.2.5 Care Act 2014 This Act places duties on local authorities and partners (including housing providers) to promote wellbeing and prevent the escalation of care needs. It encourages early intervention and partnership working to support vulnerable adults. It emphasises the importance of housing in maintaining independence and wellbeing.

4.2.6 Mental Capacity Act 2005 This Act protects individuals who may lack the capacity to make certain decisions and sets out how decisions should be made in their best interests. It guides staff in supporting customers with cognitive impairments or fluctuating mental health. It ensures that decisions about housing or support are made lawfully and respectfully.

4.2.7 Hate Crime and Hate Incidents Framework
As defined by the Crime and Disorder Act 1998, Any criminal offence which is perceived by the victim or any other person to be motivated by hostility or prejudice based on a person's; disability, race or ethnicity, religion or belief, sexual orientation, or transgender identity". We commit to identifying, recording, investigating, and responding to hate crimes and hate incidents affecting our tenants, staff, and communities

4.3 Other Relevant Legislation

- Social Housing (Regulation) Act 2023
- Anti-social Behaviour, Crime and Policing Act 2014
- Domestic Abuse Act 2021
- Disabled Persons (Services, Consultation and Representation) Act 1986
- Housing Act 1985, 1988, 1996 & 2004
- Homelessness Act 2002
- National Care Standards Act 1988
- The Human Rights Act 1998
- Children's Act 1989 & 2004

- Financial Services and Markets Act 2000
- Housing and Regeneration Act 2008
- Protection from Harassment Act 1997
- Modern Slavery Act 2015
- Worcestershire Safeguarding Adults Board: Adult Protection and Procedures (Worcestershire County Council 2010)
- Health and Social Care Act 2008

5. Policy Statement

5.1 Overall Policy Aims

5.1.1 The purpose of this policy is to ensure that bdht provides a consistent, compassionate, and effective response to vulnerability across all areas of service delivery. It is tenure neutral and applies equally across all housing types and customer groups. It is designed to complement bdht's wider policies on safeguarding, equality and diversity, domestic abuse and customer care and access to services.

5.2 Our Key Objectives:

5.2.1 Promote equality and inclusion to ensure vulnerable customers are not disadvantaged in accessing housing or services, embed inclusive practices that reflect the diverse needs of our communities and uphold our legal obligations under the Equality Act 2010 and other relevant legislation.

5.2.3 Identify vulnerability early by equipping staff with the skills and tools to recognise early signs of vulnerability. Encourage proactive engagement and early intervention to prevent crisis situations and use customer data and feedback to inform service design and delivery.

5.2.4 Deliver person-centred services by tailoring services to meet individual needs, preferences, and circumstances; make reasonable adjustments to ensure accessibility and fairness and treat all customers with empathy, dignity, and respect

5.2.5 Help vulnerable customers maintain successful tenancies and avoid eviction, provide or refer to appropriate support services, including financial, health, and wellbeing assistance and monitor outcomes and adapt support as needs change.

5.2 6 Strengthen safeguarding and risk management by ensuring staff understand and follow safeguarding procedures, protect customers from harm, exploitation, or neglect, and work collaboratively with external agencies to manage risk and provide holistic support.

5.2.7 Build staff confidence and capability by providing training and guidance to help staff respond effectively to vulnerability, foster a culture of learning, reflection, and continuous improvement, and encourage staff to share good practice and escalate concerns appropriately

5.2.8 Ensure accountability and transparency by maintaining accurate records of vulnerability and support provided, monitor service performance and customer outcomes and review and update the policy regularly in line with legislation, best practice, and customer feedback.

5.2.9 Embed a whole-organisation approach by ensuring all departments understand their role in supporting vulnerable customers, ensuring we promote cross-team collaboration and shared responsibility and aligning this policy with bdht's wider strategies on customer experience, safeguarding, equality, and tenancy sustainment.

6. Recognising and Acting on Customer Information

6.1 At bdht, we understand that vulnerability is not always disclosed directly. Often, it is revealed through subtle signs, patterns of behaviour, or changes in circumstances. Recognising and appropriately acting on this information is essential to delivering inclusive, person-centred services.

6.2 Recognising Indicators of Vulnerability

6.2.1 Staff should be alert to signs that may suggest a customer is vulnerable and in need of additional support, including:

Health	Life Events	Resilience	Capability
• Physical impairment/ disability • Severe or long-term illness • Terminal illness • Mental health condition, impairment, or disability • Pregnancy • Neurodiverse conditions or impairment	• Domestic Abuse (including coercion and/or economic control) • Bereavement • Increase in family unit size • Experience of anti-social behaviour or neighbour harassment • Relationship breakdown • Caring responsibilities • Change in circumstances (i.e. leaving care, seeking	• Levels of debt • Inadequate or erratic income • Food poverty • Fuel poverty • Isolation	• Unable to manage finances • Low levels of literacy or numeracy skills • Language barriers • Low or non-existent skills, and/or access • Learning difficulties • No access to help and support

• Addiction or substance misuse • Elderly	asylum or protection from human trafficking or modern slavery) • Change in circumstances (i.e. change in employment) • Experiences faced that may impact as a member of the LGBTQIA+ community • Change in religious practice		

6.2.2 We recognise that these can be temporary, permanent, situational, or fluctuating; depending on individual circumstances. Some customers may require minimal or no additional assistance, whilst others may need significant support. These indicators may arise during phone calls, face-to-face meetings, digital communications, or home visits.

6.2.3 **Indicators of change of circumstances**

- Repeated missed appointments or failure to respond to communications
- Emotional distress, confusion, or signs of anxiety during interactions
- Behavioural indicators linked to mental health concerns
- Sudden changes in payment behaviour or rent arrears
- Reports of domestic abuse, harassment, or neighbour disputes
- Non-responsive to communication
- Requests for help with basic tasks, decision making or tenancy responsibilities
- Evidence of hoarding, neglect, or unsafe living conditions
- Frequent complaints or service dissatisfaction without clear cause

6.3 Acting on Information

6.3.1 When staff identify potential vulnerability, they should:

- **Engage sensitively**: Ask open, non-judgmental questions to understand the customer's situation

- **Record appropriately**: Log relevant details in the customer's record using bdht's internal systems, ensuring accuracy and discretion. Ensure data is accessible to staff to inform service delivery and review and update vulnerability records regularly.
- **Make referrals**: Where appropriate, refer the customer to internal support teams (e.g. 360 Support, Communities, or Income) or external agencies such as; mental health services, domestic abuse support, or financial advice organisations. Work with multi-agency safeguarding hubs when necessary.
- **Offer adjustments**: Tailor communication and service delivery to meet the customer's needs (e.g. longer appointments, simplified language, home visits). Provide home visits or extended appointment times, use plain language, and avoid jargon. Involve advocates, careers, and support workers in discussions. Priorities repairs or tenancy support services and offer flexible payment plans or financial advice referrals.
- **Escalate concerns**: If there is a safeguarding risk, follow bdht's Safeguarding Policy and escalate to the designated safeguarding lead
- **Safeguarding:** If a customer is at risk of harm, bdht will follow its Safeguarding Policy and escalate concerns to the relevant authority. Staff are trained to recognise signs of abuse, neglect, or exploitation and act accordingly.

6.4 Continuous Improvement

6.4.1 bdht encourages a culture of learning and reflection. Staff are supported to:

- Share good practice and lessons learned
- Participate in training and development
- Use 121s and team meetings to discuss complex cases
- Contribute to service improvements based on customer feedback and experience
- We recognise the importance of learning from complaints and cases referred to the Housing Ombudsman regarding our customers: We will review lessons learned and share action plans across teams to improve our services. Complaint case reviews will support complex case management, ensuring that considerations are integrated with a holistic approach.

6. Staff Responsibilities and Training

6.1 bdht will provide annual training to ensure staff can recognise and respond to vulnerabilities, are able to respond sensitively and effectively, aware of our safeguarding procedure and confident to escalate to our internal safeguarding team. Ensure they are confident in updating QL to record and manage vulnerability and are aware of referral pathways and support services.

7. Service Provision

7.1 bdht is committed to delivering housing and related services that are accessible, inclusive, and responsive to the needs of vulnerable customers. We recognise that vulnerability can impact a person's ability to engage with services, maintain their tenancy, and live independently. Therefore, our service provision is designed to be flexible, person-centred, and proactive.

7.2 Inclusive and Accessible Services

We will ensure that all customers can access our services by:

- Offering multiple communication channels (e.g. phone, email, web portal, live chat, in-person)
- Providing information in alternative formats (e.g. large print, easy read, translated materials)
- Ensuring our physical spaces are accessible to people with mobility, sensory, or cognitive impairments
- Using plain language and avoiding jargon in all communications
- Have advocates who can communicate on their behalf

7.3 Reasonable Adjustments

7.3.1 bdht are committed to ensure equal access to services and will make reasonable adjustments to ensure that vulnerable customers can engage with our services effectively. These may include:

- Extended appointment times or flexible scheduling
- Home visits or alternative meeting locations
- Support with completing forms or understanding tenancy documents
- Involving advocates, carers, or support workers in communications, visits and decision-making
- Allowing additional time for customers to respond to communications, prioritise urgent repairs or support based on individual needs

7.3.2 All adjustments will be made in consultation with the customer and documented appropriately. Every policy that is reviewed or introduced, reasonable adjustments should be considered as part of the review process.

7.4 Partnership Approach

7.4.1 Supporting vulnerable customers often requires a multi-agency response. bdht will work collaboratively with agencies such as;

- Local authorities (e.g. adult and children's social care)
- Health services (e.g. GPs, mental health teams, hospitals)
- Police and community safety teams
- Domestic abuse and victim support services
- Financial and debt advice agencies
- Voluntary and community sector organisations

7.4.2 We will seek consent from customers before sharing information unless there is a safeguarding concern or legal obligation. Our goal is to ensure that customers receive holistic, joined-up support that addresses both housing and wider wellbeing needs.

7.5 Decision-Making and Empowerment

7.5.1 bdht is committed to empowering vulnerable customers to participate in decisions that affect their housing and wellbeing. We will:

- Ensure customers understand their rights, responsibilities, and options
- Provide clear, accessible information to support informed choices
- Respect the views and preferences of customers, even when they differ from professional recommendations
- Involve customers in service design and improvement through feedback and engagement
- Apply the principles of fairness, transparency, and accountability in all decisions
- Where customers are demonstrating behaviour that may be subject to our Unacceptable Behaviour policy, all circumstances will be considered as part of the decision

7.5.2 Where a customer lacks capacity to make certain decisions, bdht will follow legal frameworks such as the Mental Capacity Act 2005 and involve appropriate advocates or representatives.

8. Data Protection and Confidentiality

8.1 bdht is committed to protecting customer data. All personal information relating to vulnerability will be:

- Collected and stored in accordance with the UK GDPR and Data Protection Act 2018
- Used only to improve service delivery and safeguard customers
- Accessed only by authorised personnel
- Shared externally only with customer consent or where legally required

8.1.1 Customers have the right to access, correct, or request deletion of their personal data, subject to legal and safeguarding exceptions.

9. Summary of Service Standards

9.1 All service delivery policies are accompanied by a Service Standard. Service standards include specific standards ensuring all customers can access services and information.

10. Equality Statement

10.1 At bdht, we are proud to serve and work within a diverse society. We recognise that some individuals and communities face systemic barriers, disadvantage, and discrimination, including those related to socio-economic background, caring responsibilities, and the impact of intersectionality.

We believe that discrimination in any form is unacceptable. In all our areas of work we are committed to ensuring that our policies, practices, and services promote fairness, equity, and respect for all. We aim to *reduce inequalities, promote respect, and create an equitable culture within our organisation*.

bdht fully complies with the Equality Act 2010 and all relevant statutory and regulatory guidance, including that issued by the Regulator of Social Housing, Homes England, the Government Equalities Office, and our funding partners.

We believe that equality of opportunity is fundamental to delivering excellent services and building vibrant communities together. Our commitment is underpinned by clear policies, regular monitoring, and continuous review — all of which are actively supported by our Board and Teams.

11 Priorities

11.1 It is essential for the effectiveness of this policy, that all stages are given equal priority.

12. Monitoring and Review

12.1 As part of continuous improvement and learning, this policy will be reviewed every three years, or sooner if there are changes in legislation or regulatory guidance, feedback from customers or staff indicates a need for improvement or internal audits or service reviews identify gaps or risks.

12.2 The Head of Customer Experience will monitor;

- Monitoring access to service for vulnerable customers
- Staff compliance with procedures and training uptake
- Feedback from customers and partner agencies
- Additionally, customer data and feedback from complaints will be used to evaluate how effectively we consider customer circumstance and implement reasonable adjustments in our services.

13. Links to associated external Documents

https://www.gov.uk/government/publications/consumer-standards-code-of-practice
https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/

14. Link to associated internal Documents

- Safeguarding Policy
- Equality, Diversity & Inclusion Policy
- Domestic Abuse Policy
- Customer Care and Access to Services Policy
- Customer Charter
- Complaints and Compensation Policy
- Data Protection Policy
- ASB Policy
- Repairs and Maintenance Procedure
- Unacceptable Behaviour Policy

15. Approval was gained

15.1 This policy was approved by EMT on 23rd October 2025

16. Review Date

16.1 This policy will be reviewed in September 2028

17. Responsibility for implementing the policy

17.1 The Director of Housing & Communities, & Head of Customer Experience are responsible for the implementation of this policy. However, all managers are responsible for ensuring this policy is implemented through their team meetings and 1-2-1's with staff.

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