



Vulnerability Policy

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Appendices	N/A

1. Introduction to the Policy

1.1 This policy outlines how we will support SYHA customers, tenants and their household if they have vulnerable needs.

1.2 It also outlines what we see as a 'reasonable adjustment' e.g. quicker response times for repairs and in what circumstances we will make them and how SYHA tenants can request them.

1.3 This policy applies to all residents, household members and customers. The type of support that we will provide may depend on the type of tenancy or lease you have with us.

1.4 SYHA staff should read this policy alongside the policies listed below. Where there is a risk of harm, abuse or neglect to residents or household members then we will follow our safeguarding policies and/or our Domestic Abuse and Violence Against Women & Girls (VAWG) Policy.

- [Safeguarding Adults Policy](#)
- [Antisocial Behaviour \(ASB\) Policy](#)
- [Lettings Policy](#)
- [Adaptations Policy](#)
- [Complaints Policy](#)
- [Domestic Abuse & VAWG Policy](#)

1.5 Our Adaptations Policy sets out how we will provide adaptations to help tenants continue to live independently in their home. An 'adaptation' is a physical alteration or addition to a home, designed to make it easier or safer to use by older people or people with a disability, health condition or other impairment.

2. Scope

2.1 This policy applies to all SYHA customers including those who live in our homes, those who receive support in our homes and those who receive floating support from SYHA across the communities we serve.

2.2 This policy is a statement of our commitment to ensure tenants and customers with disabilities and/or vulnerable needs aren't at a disadvantage when

accessing our services. It doesn't explain how we'll support or assist a tenant with additional needs in every situation but rather outlines our wider approach.

2.3 SYHA is committed to providing 'person-centred' services to all tenants, customers and their households, we are committed to identifying improvements and learning to how we support all needs of our tenants and customers.

2.4 The policy clearly outlines SYHA's responsibilities and the actions we will take.

2.5 There is sometimes an overlap between people disclosing a vulnerability to us and experiencing domestic abuse or VAWG or another safeguarding concerns. We will respond to any safeguarding concern as per our Safeguarding Adults /Safeguarding Children Policies and we will respond to anyone experiencing domestic abuse as per our Domestic Abuse & VAWG Policy.

3. Defining vulnerability

3.1 We acknowledge and understand that by having a disability, it does not automatically mean a person is vulnerable. At the same time, we understand that not all our tenants with vulnerable needs have a disability. This Policy sets out our commitment that tenants with disabilities and/or vulnerable needs aren't at a disadvantage when accessing our services.

3.2 The Housing Ombudsman defines vulnerability as, *"A dynamic state which arises from a combination of resident's personal circumstances, characteristics and their housing complaint. Vulnerability may be exacerbated when a social landlord does not act with appropriate levels of care when dealing with a resident's complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced"*.

3.3 A person may be considered vulnerable due to a range of conditions, which may be temporary or ongoing. Vulnerability can arise from single or multiple issues and may fluctuate depending on life circumstances. Examples include:

- Need for support services.
- Challenges with daily living activities, possibly exacerbated by substance misuse.
- Physical or mental health conditions.
- Sensory impairments.
- Limited mobility.
- Experiences of abuse or neglect.

3.4 Under the Mental Capacity Act 2010, SYHA will presume capacity unless strong evidence suggests otherwise. For customers lacking capacity, we will collaborate with their advocates and legal representatives to ensure they receive necessary services.

4. What we will do

Communications & systems

4.1 We will provide information and guidance about what a vulnerability is and how that might impact the service that we provide customers through our website and in our direct communications with customers.

4.2 We will ask all SYHA customers on a regular basis whether they would like to tell us about any vulnerabilities that may inform and change how we communicate and support them to sustain their tenancy with us. We do not have an assessment for vulnerability and instead will take a common-sense approach to adapting our approach to meet customers' needs based on what they have told us. We will review this at least once a year.

4.3 We will keep up-to-date and accurate records on our internal systems and wherever possible we will use this information to meet the needs of our customers. We will use a customer's preferred form of communication wherever possible.

4.4 We will communicate with anyone who has formal 'Delegated Authority' on the behalf of the customer.

4.5 We will ask customers if they have any additional support or communication preferences. Where possible, and when it is needed, we will appoint a designated lead to act as a first point of contact for customers with an identified vulnerability.

Property Adaptations

4.6 Wherever possible, we will make reasonable adaptations up to the value of £1,200 to enable a customer to continue to live in their home. We will only not do this in situations where it would breach other policies and regulation – e.g. building control rules.

4.7 When required we will instruct a locksmith to change the locks at no cost to the tenant where the lock change is linked to the vulnerability.

4.8 Where reasonable, we will allow extra time for customers to complete necessary remedial work on their property following a property inspection providing it complies with SYHA's Health & Safety policy and other policies and regulation.

Repairs & maintenance

4.8 We will undertake emergency repairs – especially heating as a priority and where possible on the same day that it is reported.

4.9 We will ensure that our teams and contractors are aware that a customer has an identified vulnerability and clearly understand the additional support needs.

4.10 We will proactively contact a customer quarterly where the system flags that they do not have electric or gas supply.

4.11 We may schedule a repair faster than usual if we deem that there is a significant need due to an identified vulnerability.

4.12 We may help with packing up belongings and move furniture on exceptional occasions if this presents as a barrier to getting work done due to an identified vulnerability.

4.13 We may provide financial assistance through hardship grants in exceptional cases to customers with an identified vulnerability to provide gas or electric supply as protection for the customer and the property.

Furnished lettings

4.14 We may offer a furnished letting to applicants who inform us of a vulnerability in which an unfurnished flat might present a barrier to them successfully settling into the tenancy. Furnished lettings include carpets, white goods and beds. This offer is already extended to applicants who are moving out of temporary accommodation, are fleeing domestic abuse and VAWG or have a medical priority.

4.15 We may provide additional safety measures such as additional locks free of charge to customers with an identified vulnerability if we think it is needed for their safety and security.

Financial support

4.16 We will assist with utility payments where they are impacting on the person and the condition of the property as per SYHA's Utility Policy.

4.17 We will complete a full benefit review to ensure customers are accessing all the benefits that they are entitled to at the start of a tenancy and the periodically

4.18 We will signpost and refer customers to specialist agencies to support with debt, and we will support and apply for Discretionary Housing Benefit where appropriate.

Allocations and Lettings

4.19 We will take into consideration any information on vulnerability to ensure that the offer of housing is right for the individual, the wider household and where appropriate, the scheme. All decisions will be made in line with our Lettings Policy.

4.20 We will always ensure that prospective tenants understand what is required of them before entering into a tenancy agreement.

4.21 We will ensure that information and documentation relating to the tenancy agreement is accessible.

Complaints process

4.22 We will make it easy for customers to complain and provide different ways to do this, including in person, on the telephone, by email and on our website. We will use the customer's preferred form of communication throughout the complaints process.

4.23 We will accept complaints from an advocate or representative acting on behalf of one of our customers providing that they have the authority to act on the customers' behalf and complies with our GDPR policy for keeping information about vulnerable customers confidential

4.24 We will keep our records up to date with any changes to vulnerability for the customer or someone in their household and we will keep any reasonable adjustments under review.

4.25 We may extend the complaint response time if a customer asks us to do this due to barriers presented by their disclosed vulnerability.

4.26 We will support customers to use the complaints process if they feel that SYHA has breached the Vulnerability Policy.

Domestic Abuse, Violence Against Women & Girls (VAWG), Cuckooing & Safeguarding

4.26 We will improve the security measures in customers' homes such as replacing locks and alarms for customers experiencing Domestic Abuse, VAWG or Cuckooing free of charge as per our Domestic Abuse & VWAG policy.

4.27 We will carry out any required lock change free of charge to prevent a perpetrator from entering a property illegally. Where the perpetrator is a tenant and has a right to enter, we will support the victim to get an occupation or family order to exclude access.

4.28 We will carry out repairs caused by a perpetrator free of charge to the person who has experienced the abuse.

4.29 We may give beneficial status to customers who require transfer or rehousing due to Domestic Abuse, VAWG or being cuckooed.

5. Legislation & Regulation

5.1 The Policy should be read alongside legislation listed below

- [Mental Capacity Act 2005](#)
- [Care Act 2014](#)
- [Data Protection Act 2018](#)
- [Anti-social Behaviour, Crime and Policing Act 2014](#)
- [Social Housing \(Regulation\) Act 2023](#)
- [Landlord and Tenancy Act 1985](#)
- [Housing Act 1985](#)
- [Housing Act 2004](#)
- [Domestic Abuse Act 2021](#)
- [The Equality Act 2010](#)
- [The Children & Families Act 2014](#)
- [The Safeguarding Vulnerable Groups Act 2006](#)
- [Anti-Social Behaviour Act 2003](#)
- [The Children Act 1998](#)
- [Human Rights Act 1998](#)

- [Consumer Standards](#)

5.2 Regulatory Social Housing (Regulation) Act: Consumer Standard (July 2023). The Tenancy Standard requires that:

2.2.1 Registered providers must provide services that support tenants to maintain their tenancy or licence and prevent unnecessary evictions.

2.3.1 Registered providers shall publish clear and accessible policies which outline their approach to tenancy management, including interventions to sustain tenancies and prevent unnecessary evictions, and tackling tenancy fraud, and set out:

5.3 The Housing Ombudsmen report “Relationship of Equals” states landlord should:

- 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, the Human Rights Act and the Care Act
- implement a specific reasonable adjustments policy
- introduce minimum staff training requirements such as Dementia Friends, and training on customer care, mental health, learning disabilities, and sight and hearing loss

6. Equality, Diversity & Inclusion

6.1 SYHA strives to be an open, inclusive, and diverse organisation where everyone has a right to be treated with dignity, fairness, and respect.

6.2 We recognise that some people with protected characteristics and additional needs experience barriers to telling us about any vulnerabilities. We will do our best to identify the needs of these customers, listen and respond in a personalised way and we will seek specialist support to help us to do this where appropriate.

6.3 While there may be overlap between vulnerability and protected characteristics under the Equality Act 2010, not all individuals with protected characteristics are necessarily vulnerable.

6.4 Vulnerability assessments will be conducted on a case-by-case basis, acknowledging that not all individuals within certain groups are vulnerable. Factors indicating vulnerability may include:

- Physical or mental health conditions.
- Sensory impairments.
- History of abuse.
- Substance misuse issues.
- Social isolation or repeated homelessness.

7. Roles and responsibilities

Document and update records on identified vulnerabilities.	Housing Services staff Livewell frontline staff Customer Connect Property Services Officers
Engage in discussions with customers regarding their needs and make referrals and reasonable adjustments as necessary.	Housing Services staff Livewell frontline staff Customer Connect Contractors to feed back any concerns as per approach to safeguarding Property Services Officers
Order lock changes, aids and adaptations and other works.	Customer Connect Property Services Officers
Vulnerability budget	Head of Landlord Services (General Needs) Heads of Service (LiveWell)
Overall accountability	SYHA Executive Team

Consultation

- SYHA Safeguarding Lead

- Neighbourhood & Mixed Tenure Manager
- SYHA Heads of Service
- SYHA Customer Engagement Panel

Who/what?	Area	Change made
Engagement Panel	Provided input into questions required to tease out vulnerability	<p>The customer approved the following questions:</p> <ol style="list-style-type: none"> 1. Do you have any health concerns that might be useful for us to know to provide a better service to you? 2. Do you consider you or anyone in your household to be vulnerable or disabled? 3. Is there any information about you or people in your household that would be helpful for us to know to provide a better service?