



Solihull
Community Housing
Shaping our neighbourhoods

Vulnerability and Additional Needs Policy

July 2025



Lead officer	Head of Customer Experience
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Version	Date	Reason for Change
1.0	July 2025	New Policy



Solihull Community Housing (SCH) manages and maintains council homes and delivers housing services on behalf of Solihull Metropolitan Borough Council (SMBC). Although SCH provides day-to-day housing services, the Council remains the owner of the housing stock and is your landlord. The Council retains the responsibility for ensuring your home is managed in line with the Consumer Standards.

1. Scope

Scope of Policy

- 1.1** This policy applies to all SCH tenants and leaseholders and while those residents in supported housing by the nature of the accommodation, may receive different services, SCH will consider the tenant's needs and any reasonable adjustments due to a disability, or other vulnerability in line with this policy.
- 1.2** Safeguarding concerns will be raised in line with SCH Safeguarding Policy which sets out how we identify and support vulnerable adults and children at risk, so that statutory agencies are quickly made aware of our concern.
- 1.3** This policy focuses on customers who have capacity to make their own decisions. Where a resident has been assessed as lacking, or is believed to lack, capacity to make decisions for themselves we will work with their appointed representative.
- 1.4** This policy does not apply to the provision of aids and adaptations to our residential properties which is set out in our Aids & Adaptations policy. It also does not apply to aids and adaptations to common parts of a building which are not subject to the same anticipatory duty as the provision of services under the Equality Act 2010.
- 1.5** For clarity this policy does not include tenants in temporary accommodation whose support needs are addressed within specific policies and procedures.
- 1.6** The terms "vulnerable" and "vulnerability" are not used in this policy to imply statutory meaning or responsibility. In other areas of work including safeguarding, homelessness and social care duties, the term "vulnerable" has a specific meaning.



2. Definitions

2.1 At points during our lives, we all experience vulnerability. Vulnerability exists alongside an individual's strengths and resilience. Vulnerability is neither a negative, a final, nor an all-encompassing definition.

- a. SCH defines 'vulnerable' in relation to the provision of its services as: a customer's particular protected characteristic, circumstance and/or experience from an exceptional life event results in the individual's ability to sustain their tenancy, access or use SCH's services independently or needs additional support or reasonable adjustments.
- b. A vulnerable customer is anyone who is experiencing difficulties with everyday living; and, in order not to be disadvantaged by those difficulties, needs either:
 - additional support or service adaptation to access our landlord service or
 - additional support to sustain the tenancy
- c. Our definition reflects our understanding that 'vulnerability' can be a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental or physical health, domestic violence, poverty or socio-economic circumstances. Some of these factors are more permanent and others, such as bereavement or domestic violence will have a major impact but the effects might diminish over time.
- d. It is the interaction of these factors that will determine how vulnerable a person is at any point in time and how much additional assistance they may require to sustain their tenancy. An individual's ability to act, engage or cope with everyday activities varies and so is an important factor in considering vulnerability. Some groups of people, because of structural disadvantage, find it more difficult to access services than others. Very often, vulnerability arises from a combination or interaction of these factors.

2.2 Our customers have an obligation to fulfil the conditions of their contractual agreement, and being vulnerable does not mitigate a customer from these responsibilities. We do recognise some customers may require additional support or tailored services to meet their tenancy obligations. We will 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.

We recognise that SCH residents may be or become vulnerable due to abuse or risk of abuse and may require special protection. In such cases, SCH will refer people to specialist agencies and Solihull Council.

Additional Needs

- 2.3** A person may also have additional needs. The additional needs are not always an indication of vulnerability. An example is the need for information to be provided in alternative formats and languages. Making such reasonable adjustments can enable people to access our services effectively. People may effectively manage their medical conditions but consequently need appointments for SCH services to be at particular times of the day.

3. Policy Objectives

3.1 This policy will set how SCH will do the following:

- How we define vulnerability and customers with additional needs
- How we identify vulnerable customers
- How we record and review customer vulnerability and additional needs
- Factors such as communication needs and risk we consider alongside vulnerability
- How we communicate customer's needs to contractors and external partners
- How we support customers across specific service areas

3.2 The outcome we wish to achieve is:

- a. To provide high quality, flexible services that are tailored to the individual needs of vulnerable customers and those with additional needs.
- b. To ensure that our approach to identifying and supporting our vulnerable customers is consistent across all service areas, while also meeting the needs of those who have additional requirements to do this successfully.
- c. To provide a caring environment for customers whilst not intruding on their privacy.
- d. To help vulnerable customers and those with additional needs to sustain their tenancies.

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- e. To treat customers in a fair and non-discriminatory way, in accordance with our Equality and Diversity Policy.

3.3 To do this we recognise:

- a) The need to have clear policies and procedures which embed consideration of a person's vulnerability and additional needs into service delivery.
- b) That our staff are trained and aware of how to identify and respond to a person's individual needs when receiving our services.
- c) That systems and records are ordered in a way that provides the most effective way of recording and sharing relevant information about our customers

4. Policy Statement

4.1 SCH deliver services to a wide range of people including those who can be considered vulnerable. In addition, some of our customers have needs beyond what is routinely provided to allow them access our services. We recognise that we have a responsibility to ensure that vulnerable residents and those with permanent or temporary additional needs can access the services we provide in a fair and equitable way.

4.2 This policy outlines the approach taken by SCH in dealing with vulnerable residents, and those with additional needs, and ensuring they can access our services by putting processes in place that are sensitive to the individual and provide adequate opportunities to access support networks when necessary.

5. Key Policy Details

Identifying Vulnerability

5.1 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.



5.2 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 is essential to consider 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.

5.3 Most of our residents are not vulnerable, or have specific additional needs, in terms of this policy, and we do not assume that whole groups of people with specific characteristics are vulnerable. Every resident is treated as an individual when assessing vulnerability or specific needs and determining the level of support required.

5.4 We use three key sources of information for identifying vulnerability and therefore understanding a resident's individual needs:

- Information provided directly by the customer
- Internal data held by SCH and SMBC
- Formal assessments where there is a legally prescribed process to follow.

5.5 A customer who is experiencing vulnerability, or has additional needs, may be identified by:

- customers when they apply for housing or contact us, or self-refer
- any SCH colleague who has contact with customers in person, on the phone or through any other channel of communication
- our contractors
- a referral from an external agency or organisation.

5.6 We expect all our colleagues to be aware of the possibility that a customer may be experiencing vulnerability or having additional needs, through information they receive or from their own observations during routine work such as home visits or during a conversation over the telephone.

5.7 At key points, SCH staff formally assess whether a tenant or resident leaseholder requires specific adaptations or priority to access housing services and if they need additional support or assistance to sustain their tenancy.



Those points include:

- Homelessness and housing register assessments
- During the allocations process
- At tenancy signings and during introductory visits
- During the 'Right to Buy' process
- At tenancy audit visits
- During conversations about arrears or other tenancy or leasehold management matters
- Whenever we are pursuing possession proceedings against a tenant, or forfeiture against a leaseholder, with a review of that assessment when we move from one stage of proceedings to another.
- Whenever we are investigating ASB or a hate crime
- Following identification of potential needs through data or responsive means

5.8 At pre-allocations stage, the focus of assessment is very different from the focus at allocation and during the tenancy. At pre-allocations stage, the focus responds to statutory requirements to assess, for example, our homelessness duty or an applicant's housing priority. However, we review those assessments at allocations and during early tenancy interactions to inform assessments of whether the tenant is vulnerable in terms of this policy.

5.9 SCH colleagues delivering services to customers will have training, so they are able to recognise potential signs of vulnerability such as:

- antisocial behaviour because of mental health issues
- being a victim or perpetrator of antisocial behaviour, harassment, or domestic violence
- a repeated failure to respond to correspondence or to answer the door when visited
- hoarding, self-neglect or other behaviour which results in the person's home and/or garden becoming damaged, neglected or otherwise unfit for occupation
- erratic rent payments and falling into arrears when the customer previously had a good payment history.

Recording Vulnerability

5.10 We will make reasonable efforts to establish with our customers whether they or a member of their household have a disability, a health condition, or any other



needs such as low literacy or numeracy and whether they require a reasonable adjustment in how we deliver our service.

5.11 SCH staff who book appointments for visiting residents at home are expected to check for any agreed reasonable adjustments and vulnerability alerts and note these on the appointment for the visiting staff member or contractor, where it is relevant to the visit, so that they have advance knowledge of any additional factors, to consider when delivering services, and can check the resident record for further information.

5.12 We will record any known communication preferences such as telephone or email contact only, or large print so that communications can be adjusted. We do however reserve the right to send some communications in writing in addition to the preferred method where there is a legal requirement or other legitimate reason to do so; for example, where other attempts at contacting the resident have failed.

5.13 There are ongoing options for customers to share information about their needs with SCH. While customers can complete this online at any time, they are encouraged to do at the time they sign their tenancy and allows for relevant information to be factored into future service delivery.

5.14 The information collected through this self-declaration process is recorded on the housing management system and this is used by staff when interacting with customers.

6. Communications

6.1 We have a fundamental responsibility to communicate effectively with our customers. This includes a responsibility to try to establish what method and style of communication will work best for individuals and groups of customers.

6.2 Communication is a key consideration when supporting vulnerable customers. However, not everybody with specific communications needs is vulnerable. Therefore, we carefully consider how to effectively communicate with every customer, whether they are vulnerable or not.

6.3 Customers are asked about any communication needs when they attend the tenancy sign up and at other opportunities during their tenancy. We will normally expect the customer to have made arrangements to communicate effectively, but in some exceptional circumstances where not to do so would severely disadvantage the customer, we will consider making documents available in



other languages and formats such as large print and audio or engage a British Sign Language interpreter. Customers can also ask that correspondence is sent to someone who has delegated authority' to act on their behalf. Customers can inform SCH colleagues of vulnerabilities during any point of contact with us as well as online.

6.4 Where a customer's ideal method of communication is not practical in the context of a housing management service, we work with them to reach agreement about appropriate arrangements that will work best for them. For example, we may not have capacity to guarantee that all phone calls will be made by a speaker of their first language, but we may be able to commit to speaking to a specific household member whose spoken English is more fluent and/or to writing with simple translations in place.

6.5 We aim to record whether any of our residents have specific communication needs, and the arrangements and adjustments that residents need us to make around those needs. We are committed to ensuring that individual communication needs are met to ensure that no resident is less able to access our services and sustain their tenancy.

7. Equality, Diversity and Inclusion Summary

7.1 A Fair Treatment Assessment has been carried out. By completing this we believe that improving our response to the additional needs of tenants and leaseholders, and where appropriate, adjusting service delivery we are actively addressing equality and diversity issues.

8. Meeting individual needs and reasonable adjustments

8.1 Some of the types of adjustments we can offer to our customers are given below, but this is not an exhaustive list, and other requests will be considered:



General approach

Where a person has a specific, individual need, and this requires a particular adjustment to services not covered by these examples, these are the considerations that will be made.

- the effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the individual
- the practicality for us to make the relevant adjustment(s)
- the availability of our resources including external assistance and finance
- any disruption to the service that making the relevant adjustment may cause.

Communications

- providing information in large print, an easy read format, in a specific colour contrast to aid those with visual impairments or dyslexia, or in Braille
- providing translation or interpretation services if a tenant requires information in another language.
- provide information to tenants on how to request documents in alternative formats and languages when we write to them.
- communicating in a way that best suits the tenant's specific needs. Options include telephone call, text messaging, email, video call or a face-to-face meeting either in one of our offices, in the tenant's home or in another appropriate location.
- if the customer uses British Sign Language (BSL) we might be able to provide an interpreter or other communication support in face-to-face meeting
- agreeing to liaise with an advocate on behalf of the customer. In this case, we will ask the customer to provide written authorisation, naming their authorised person.

Appointments

- scheduling appointments when a carer or family member is available.
- allowing more time for someone to reply to correspondence or requests for information

Repairs and improvements

- allowing more time for someone to answer the door
- providing repairs/ maintenance appointments sooner

- carry out small repairs that would ordinarily be a tenant's responsibility but may be challenging for them to undertaken due to their circumstances.
- Arrangements made for customers to be temporarily moved to another property for the duration of the works where a clear medical need has been identified.

Welfare

- providing a quicker response to reports of antisocial behaviour (ASB)
- coordinating welfare calls during extreme weather events or other emergency situations.
- liaising with relevant support agencies to help tenants manage their tenancy and keep safe in their home.
- In all cases we will follow the relevant safeguarding procedures if we suspect the tenant, or any member of their household may be at risk of abuse or neglect.

8.2 We recognise that some residents with complex mental health conditions resulting from violence or abuse may make specific requests such as having only female staff to visit or no visits at all. We will endeavour to meet these requests where we employ female staff in the area but maintain our right to access the property for repairs, maintenance, and tenancy checks. We will work with the residents in such circumstances so that they can make arrangements to have somebody else present or to find an alternative reasonable solution, including pairing male members of staff with females.

8.3 Where it is not possible to meet a resident's request for a particular adjustment because of the level of additional costs, time or resource required or it is impractical to do so, we will work with them to find an alternative solution. For example, our system generated letters are printed centrally on white letterhead paper; where we receive requests for a particular colour paper due to a visual impairment, we will discuss what alternative solutions are available and practical for both the resident and SCH to enable effective communication. We will record why we could not make the requested adjustment on the customer's record.

9. Legislative & Regulatory Framework

9.1 Reasonable Adjustments

Under the Equality Act 2010, SCH may be considered as exercising a public function in the provision of its services and so must “in the exercise of its 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.

Whilst 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 how we act in relation to delivering our housing functions.

The Equality Act 2010 (s6 (1) (a) and (b)), requires SCH to provide reasonable adjustments in the provision of services to those who have:

“a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on [their] ability to carry out normal day-to-day activities”. The duty is ‘anticipatory’ to disabled people in general as well as to individuals, so we must think in advance and anticipate what disabled people might reasonably need.

The duty requires reasonable adjustments where our arrangements for accessing or receiving services place a disabled person at a substantial disadvantage in comparison with those who are not disabled.

‘Substantial’ is defined in the Equality Act 2010 as ‘more than minor or trivial’, so should be more than a minor inconvenience. Our focus is on achieving the same or similar outcome for the disabled resident through making a reasonable adjustment. We must make reasonable efforts to establish whether a disability exists so that we do not inadvertently commit unlawful discrimination.

9.2 Regulatory Requirements

The Regulator of Social Housing’s (RSH) Transparency, Information and Accountability standard expects registered providers (RPs) to:

- treat all tenants with fairness and respect.
- take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants in relation to the housing and landlord services they provide

- use relevant information and data to a) understand the diverse needs of tenants including those arising from protected characteristics, language barriers and additional support needs, and b) assess whether their housing and landlord services deliver fair and equitable outcomes for tenants.
- ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.
- ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required.
- allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services.

9.3 The Housing Ombudsman's statutory Complaint Handling Code 2024 states that landlords must:

- make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.
- make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.

9.4 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 consider 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.

9.5 Capacity

In line with the **Mental Capacity Act 2005**, we will liaise with those who have legal authority to act on behalf of our customers who lack capacity.

That may be a representative who has or is a/an:

- Lasting Power of Attorney (LPA)
- Deputyship Order from the Court of Protection
- litigation friend appointed in Court proceedings if the resident lacks capacity to litigate
- appointee appointed by the DWP to manage a person's benefits if they lack capacity.
- Independent Mental Capacity Advocate (IMCA) commissioned by the local authority who are appointed where a person aged 16 or over lacks ability to act to decide for themselves where to live and has no one, such as a friend, relative, attorney or deputy to advise or support them

10. Related Policies & Procedures

This policy should be read in conjunction with

- SCH Customer Experience Strategy
- SCH Equality, Diversity and Inclusion Policy

This policy affects all SCH's policies and procedures relating to tenancy management and landlord services.

11. Key Roles and Responsibilities

	Key Role
Board	Oversight
ELT	Ownership and approval
Employees	Understand and implement
Customers	Understand
Contractors	Understand and implement



11.1 Monitoring Arrangements

This is part of a wider programme of work related to the Customer Experience Strategy which, as it develops, may lead to changes in the policy. There are a variety of reporting requirements for this wider approach, including updates to ELT, and this will form part of that where relevant.

11.2 Review

This policy will be reviewed every **three** years by **the Head of Customer Experience** unless there are any significant changes to current legislation or regulation, good practice or guidance, or as the result of the outcome of an incident review or Ombudsman determination.