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Strategy;	Customer & Communities Strategy 2025
Supporting Documents;	Safeguarding policies, Reasonable Adjustments
Associated risk;	8. Inadequate and ineffective customer service and/or engagement 9. Health and safety failure or neglect
Equality & diversity	The Equality Act requirements are included in the policy, which is focused on providing a fair and equitable service to all residents.
VFM & benchmarking;	Proactively engaging with residents experiencing vulnerability can generate value for money by reducing repair and void costs.

VERSION CONTROL			
Version Number	Sections Amended	Date of update	Approved by
1.0	First issue in new template	September 2026	HB

Relevant Legislation:

Equality Act 2010
Human Rights Act 1998
Care Act 2014
Data Protection Act 2018 and subsequent Regulations
Housing Act 1996
Protection from Harassment Act 1997
Freedom of Information Act 2000
Regulator of Social Housing Consumer Standards
Safeguarding of Vulnerable Groups Act 2006

Related Policies:

Safeguarding Adults Policy
Safeguarding Children Policy
Aids & Adaptations Policy
Anti-social behaviour Policy
Equality, Diversity & Inclusion Policy
Data Protection Policy
Domestic Abuse Policy
Hate Crime Policy
Lettings Policy
Unacceptable and Unreasonable Behaviour Policy
Warning Flags Policy

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1. Introduction

- 1.1. At Cornerstone, providing safe, affordable and warm homes for all our residents is a priority. We recognise that some of the people we house will have a degree of vulnerability and face individual challenges that affect their wellbeing, how they engage with us, other agencies, their community and their ability to sustain their tenancy. These residents may benefit from a more tailored service or additional appropriate support.
- 1.2. This policy sets out our commitment to treating all residents with fairness and respect and to ensuring all residents can access our services, and that they receive the assistance they need to sustain their tenancy.
- 1.3. Cornerstone provides or signposts residents for additional support and responds flexibly to residents who are experiencing circumstances that can make them more vulnerable and unable to cope and manage their tenancy. To ensure we do this consistently we will provide our staff with the information, understanding and tools to respond appropriately to residents' needs. This policy sets out how we will achieve this.
- 1.4. Some residents who are experiencing a vulnerability may have capacity to make their own decisions, and others may not. Where a customer has been assessed as lacking, or believed to lack, capacity to make decisions we will work with their appointed representative as set out in section 6.
- 1.5. Where we have concerns about a residents' safety or mental capacity, we have an obligation to support them. We will alert those who have a statutory duty to investigate, and we will support investigations and offer support to residents as appropriate. Our expectations are that customers will engage with us and the services that are able to provide support to them.
- 1.6. This policy applies to all Cornerstone residents and potential residents, and members of their household, including shared owners.

2. Defining and identifying vulnerability

- 2.1. Our definition of a vulnerability is:

“When a person’s circumstances, experiences or environment mean they may need additional support to manage their home or tenancy, to access services, or to protect themselves from harm or exploitation.

Vulnerability is not a person’s characteristic or identity, but it is a state that can be temporary or permanent, worsened or improved.”

2.2. We will usually assess vulnerability using two methods 1) the resident's own view of their situation and 2) our own professional judgement based on our assessment of certain situations that could increase the risk of a resident being vulnerable. We will make every effort to use both methods but, in some instances, we may use only one of these methods.

2.3. We will assess the risk of vulnerability using risk assessments a safeguarding approach in accordance with our safeguarding policies and procedures. Situations that can increase the risk of a person being vulnerable are detailed in Appendix 1.

2.4. When delivering services, we aim to ensure that we take account of the individual's personal circumstances, situation and environment, including any protected characteristic and vulnerabilities.

3. Aims and objectives

3.1. Cornerstone's approach to providing services to those with vulnerabilities aligns with the regulations, guidelines, and expectations set by the Social Housing Regulator in the Consumer Standards and the Housing Ombudsman Service.

This policy sets out Cornerstone's aims, which are to:

- treat all residents with fairness and respect;
- meet the diverse needs of residents experiencing a vulnerability by providing a flexible and personalised service;
- strengthen accountability through transparent communication and empowering residents, and by regularly checking the effectiveness of this policy;
- provide high quality and effective training to our staff so they have the skills and knowledge needed to deliver consistently good quality services to residents experiencing vulnerability;
- work collaboratively with statutory and third party agencies, and other stakeholders to ensure residents have access to appropriate support; and
- where possible support residents to move them away from a state of vulnerability to one where they are not at risk but are thriving.

3.2. Our overall objective is to ensure that our residents can access the services and assistance they need, and that tenancies can be sustained. To do this, we will:

- Record any vulnerabilities on the residents contact record and keep this up to date.
- Use all available information to identify if a resident is at risk.

- Take account of known vulnerabilities in the provision of services and in decisions around tenancy management and enforcement.
- Assist residents experiencing vulnerabilities in accessing additional services that they may need.
- Record any known representatives who act as a 'delegated authority' or with power of attorney to act on the resident's behalf.
- Consider any additional needs due to vulnerabilities and where appropriate vary our services to ensure all residents receive the same level of service.
- Make appropriate referrals for advice and support and tenancy sustainment services, either our own or to other parties.
- Refer to statutory agencies and other external partner support agencies where appropriate.
- Make safeguarding referrals whenever needed.

4. Roles and responsibilities

4.1. All staff, contractors, and Board Members must be aware of how vulnerabilities can be a barrier for residents accessing and receiving services. They have a responsibility to identify how improvements could be made to meet the needs of residents experiencing vulnerability.

4.2. Our key responsibilities include providing tailored services to meet the specific needs of all residents.

4.3. This includes include offering ongoing support and guidance to residents throughout their time as a tenant, including that they are aware of their rights as tenants, shared owners or leaseholders and have the necessary support to exercise them effectively. The level of intervention varies by tenure type, from signposting and referring to general advice and in high need cases, intervention.

4.4. Our staff are responsible for:

- treating all residents with fairness and respect;
- maintaining professional standards in accordance with policy and relevant service standards;
- identifying vulnerabilities;
- being helpful and responding to the needs of residents empathetically and sensitively;
- recording and updating data on vulnerabilities appropriately on our systems;

- signposting and directing residents experiencing a vulnerability to relevant agencies; and
- completing all required training relevant to vulnerabilities.

4.5. Each service area will consider what additional support, consideration or variation in usual service provision is appropriate for residents experiencing a vulnerability. This may vary from service to service, but some examples are:

- allowing longer for residents to answer their door when we visit;
- arranging a joint visit of repairs operatives with carers or appropriate housing team staff for those with a hoarding disorder or those known not to let people in due to mental health issues;
- visits in person where we would normally provide a phone service;
- explaining a letter over the phone in addition to sending it;
- providing or referring for additional support someone causing anti-social behaviour with mental health issues instead of enforcement action; and
- applying for an injunction instead of possession action when the resident's vulnerability would make it extremely difficult for them to secure suitable alternative accommodation should we take possession.

Cornerstone wants to ensure that everyone has equal access to and can benefit from our services. We aim to remove the barriers that can stop residents experiencing a vulnerability from accessing these opportunities, and to achieve this, we will clearly communicate to residents and staff:

- how residents experiencing vulnerabilities are identified;
- how we record and update vulnerabilities data;
- how residents experiencing vulnerabilities can access our services;
- how we can adapt services to meet the needs of residents experiencing vulnerabilities;
- the safeguards which are in place to protect residents experiencing vulnerabilities; and
- how we will signpost and refer residents experiencing vulnerabilities to other organisations, when they require additional support.

5. Support and signposting

5.1. Cornerstone provides 'general needs' accommodation, which means support is not provided as part of the tenancy. We do not have our own support services and rely on external agencies to provide support to our residents who need it. To ensure residents can access support we may do the following:

- refer them to statutory agencies such as adult social care;
- refer them to other agencies that we partner with;
- refer them for specialist support services, for example to help with hoarding or financial advice; and
- signpost residents to other agencies, including in the voluntary sector, that may be able to support them.

5.2. Our frontline teams will be proactive in developing links with advice and support services, which we are able to access for our residents.

5.3. To ensure the best outcome for our residents, we will:

- ensure our staff are competent and knowledgeable about how and where to make effective referrals with partner agencies and understand the referral requirements and thresholds;
- provide continued support with partners engaging with residents experiencing vulnerabilities;
- share information efficiently and appropriately with partner agencies; and
- put safety first, and where appropriate work with other agencies to make sure our homes are safe for residents with vulnerabilities.

6. Mental capacity

6.1. When considering an individual's mental capacity, we will apply the five key principles of the Mental Capacity Act:

- A presumption of capacity - every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise.
- The right for individuals to be supported to make their own decisions - people must be given all appropriate help before anyone concludes that they cannot make their own decisions.
- That individuals must retain the right to make what might be seen as eccentric or unwise decisions.
- Best interests – anything done for or on behalf of people without capacity must be in their best interests.
- Least restrictive intervention – anything done for or on behalf of people without capacity should be the least restrictive of their basic rights and freedoms.

6.2. In line with the Mental Capacity Act 2005, we will liaise with those who have legal authority to act on behalf of our resident who lacks 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.

7. Safeguarding and trauma

- 7.1. Where residents experiencing vulnerabilities need safeguarding, we will follow our safeguarding policies and procedures. We will take appropriate actions to escalate to statutory services as necessary and will work collaboratively on a multi-agency level to identify and assess risk factors and provide protective factors that reduce harm and minimise risk.
- 7.2. Recording of sensitive data is managed within our customer relationship management (CRM) system. Only individuals with a legitimate purpose to view, edit or monitor cases have access to safeguarding cases.
- 7.3. We have a Safeguarding Lead person who ensures that our approach is consistent and effective. They support our staff to act swiftly and efficiently, keeping residents experiencing vulnerabilities at the heart of all processes.
- 7.4. Trauma increases vulnerability by disrupting a person's ability to feel safe, regulate emotions, trust others, and cope with stress, which can reduce their capacity to recognise risk, seek help, or recover from adversity. Traumatic experiences, particularly those involving abuse, neglect, or loss, can shape negative beliefs about self-worth and safety, increase reliance on survival behaviours, and weaken protective relationships, leaving individuals more exposed to harm, exploitation, and poor outcomes during periods of change or challenge.
- 7.5. For those whose vulnerability is related to trauma we will take a trauma informed approach. This means we will seek to reduce their vulnerability by prioritising safety, trust, choice, and empowerment. Rather than focusing on "what is wrong" with a person, we will ask "what has happened" and responds with consistency, compassion, and flexibility, recognising behaviour as communication and

avoiding approaches that may retraumatise or exclude those with complex needs.

8. Communication needs

- 8.1. We will tailor our communications to suit individual resident's requirements, once a customer has shared with us their preferred language or format.
- 8.2. We will ask our residents about any communication needs when they first become a tenant and at other opportunities during their tenancy and this is recorded on their resident record.
- 8.3. We can translate our written communications into different languages and provide formats suitable for the visually impaired and those with learning difficulties.
- 8.4. Our staff have access to spoken translators for conversations, which is available when we speak with the customer in person or on the phone, this includes British Sign Language.
- 8.5. Customers can also ask that correspondence is sent to someone who has 'delegated authority' to act on their behalf.
- 8.6. Our website has a Recite Me toolbar installed which allows people to tailor the accessibility adaptations for their needs. This includes reading the content aloud, translating into different languages, changing the font size and background colours and changing the focus on the page.

9. Reasonable adjustments

- 9.1. We understand that some customers may require reasonable adjustments for them to access services. A reasonable adjustment is a legal term described in the Equality Act (2010).
- 9.2. It means that Cornerstone has a duty to make reasonable adjustments where our working practices (including policies and procedures, or physical premises) put a resident living with disability at a substantial disadvantage in comparison with residents who are not living with disabilities because of:
 - A rule, practice, or way of doing things. The law calls this a 'provision, criterion or practice' and it could include a term in a tenancy agreement or how we do something - like when or how we collect the rent.

- Not having extra equipment, aids, or services. The law calls this an 'auxiliary aid' and it could include asking us to change some features in the home to make it easier for a resident to live there with their disability.

9.3. We might be asked to provide information in an accessible form, for example getting a copy of a tenancy agreement translated into Braille for residents who are visually impaired.

9.4. The reasonable adjustments duty only covers certain changes. The duty doesn't require us to alter or remove 'physical features', for example structural changes, removing walls, widening doorways, or installing permanent ramps.

9.5. For an adjustment to be reasonable, it should be effective, but an adjustment which is deemed effective, may not be considered reasonable. For example, resourcing is not just about the cost, but it may involve other factors for example recruiting additional staff with specific skills.

9.6. The reasonableness of an adjustment will be evaluated against the resource available to us. In changing policies, criteria or practices we are not required to change the basic nature of the service that we offer. We only must make reasonable adjustments if our customers ask us for adjustments and they are reasonable for us to provide. We cover this in our Reasonable Adjustment Policy.

10. Unacceptable, unreasonable, and anti-social behaviour

10.1. Some residents may act in an unacceptable, unreasonable or anti-social way due to a vulnerability they are experiencing. We will try to engage them and relevant support services and carers to improve the situation before taking any enforcement action. However, we do have to balance the safety and well-being of neighbouring residents and staff with the well-being of the resident causing the unacceptable, unreasonable or anti-social behaviour in considering the most appropriate response.

10.2. We will follow our Unreasonable and Unacceptable Behaviour Policy when a residents behaviour meets the criteria of that policy. We will consider the vulnerabilities of the resident as part of our assessment and how we approach any potential interventions or restrictions.

10.3. We recognise that some customers with vulnerabilities are at higher risk of becoming victims of anti-social behaviour and may be impacted more significantly than those without vulnerabilities. To help us safeguard residents impacted by anti-social behaviour we will adopt a multi-agency approach working closely with partner agencies to minimise risk.

- 10.4. We will follow our Anti-social behaviour policy and procedure in ensuring a risk-based approach when dealing with both those causing anti-social behaviour and those victims of it. Where the anti-social behaviour is serious, we will prioritise our response and provide the support of a Housing Officer or our Community Safety Lead. Where there is a significant risk of harm from others, we will take a victim centred approach.
- 10.5. We will provide self-help advice and support a range of methods to report anti-social behaviour including digital reporting methods. For those residents without digital access, we will provide sheets for recording what is happening and support on how to complete these. We will tailor our support to meet the needs of our residents which can extend to supply of video doorbells and additional security. We will focus on early intervention and the use of methods such as mediation and support referrals.
- 10.6. We recognise that residents with vulnerabilities may need additional support when they are victims or witnesses. We can protect victims by asking the Court to screen them off in the Court room so they can't be seen by the alleged party. We can also use impact statements and where appropriate, professional witnesses. Where the risk is exceptionally high, we will work closely with the local authorities to consider re-housing options.
- 10.7. In managing tenancies and leases and delivering services, we will consider whether our decision would have an unfair or disproportionate impact on the resident compared with another resident who does not have a protected characteristic or is not experiencing a vulnerability.
- 10.8. Where possession action is being considered, we will complete an Equality Impact Assessment which considers:
- whether the residents' behaviour, actions or lack of action is related to their disability or a vulnerability;
 - whether the behaviour is putting the health and safety of others at risk, for example, neighbours;
 - alternatives to possession action and why they were not suitable;
 - whether possession action is justifiable and a fair and measured step to resolve a genuine issue, and it's the least intrusive and necessary way to do it; and
 - whether the effect on the resident is outweighed by the advantages of our action.
- 10.9. We will offer all residents a right of review in possession cases where we are relying on mandatory grounds. We will offer support to residents in requesting

and engaging in that review, paying close attention to those experiencing a vulnerability.

11. Complaints

- 11.1. We recognise that sometimes when making complaints residents will let us know that they are experiencing a vulnerability, or that the concerns they are reporting are making them feel vulnerable.
- 11.2. As soon as a resident lets us know about their vulnerability or we identify that from our records we will follow this policy.
- 11.3. To make our complaints process inclusive for people with vulnerabilities we will:
 - make the process easy and accessible for all residents;
 - advertise the ways that a resident can complain and what support is available to assist them;
 - we will carefully consider the vulnerabilities of the household when investigating the complaint, noting that residents with a vulnerability may be more likely to be negatively affected by a failing in a particular service or communication;
 - provide clear outcome letters that make it easier for residents to understand what has been agreed upon and resolved; and
 - consider any vulnerabilities when deciding on appropriate compensation, noting where the impact may have been worsened due to a vulnerability.

12. Repairs and decent, safe, warm homes

- 12.1. Residents experiencing a vulnerability may be disproportionately negatively affected if something goes wrong in their home and it needs a repair, or that they may require additional support in ensuring that their home is well maintained. For example, damp and mould and other hazards in the home can be more harmful to residents with disabilities, health conditions or a vulnerability.
- 12.2. When a resident contacts us to request a repair, we will confirm if there are any disabilities, vulnerabilities or support needs which should be considered to enable the repair to be prioritised correctly and carried out effectively.
- 12.3. This will be recorded on the resident's record and provided to operatives and contractors so that the service can be delivered appropriately, to meet the needs of the household.

- 12.4. In cases where a resident's vulnerability is preventing repairs, safety checks or improvements from being carried out to their home, the repairs and housing teams will work together to assess the situation and explore solutions with the resident.
- 12.5. To keep residents safe from harm, we may need to enforce access through an injunction where all other reasonable solutions have been explored.

13. Lettings

- 13.1. When letting homes our aim is that all new tenants are set up to succeed in their tenancy. To do this we will gather information about vulnerabilities when completing assessments of applicants and when allocating our homes.
- 13.2. We will review any information we receive on vulnerability to help us make sure any offer of housing is right for the individual and their family and that they can sustain their tenancy in the long term.
- 13.3. We will require confirmation from a medical professional or other support agency of the residents' circumstances before giving any additional priority due to vulnerability in line with our Lettings Policy.
- 13.4. New tenants will be given the opportunity at the tenancy sign up to tell us about the needs of any household members and any existing care and support services received.
- 13.5. Where appropriate a referral may be made to an external support agency or further advice and support from our own tenancy sustainment worker.

14. Rent arrears

- 14.1. It is essential that residents pay their rent when it is due throughout their tenancy.
- 14.2. We recognise that some residents with vulnerabilities may encounter financial struggles related to their circumstances. We also recognise that a residents' financial security or financial situation may create a vulnerability.
- 14.3. We are committed to the prevention of arrears and in preventing evictions, wherever possible. Our focus is on offering tailored help, such as referrals to relevant support services that can support with budgeting, accessing the correct welfare benefits and managing debts. Our aim is to help residents

overcome financial challenges associated with any vulnerabilities and to sustain their tenancy.

- 14.4. We will complete an Equality Impact Assessment before possession action starts and before eviction to ensure we have considered all the vulnerabilities of the resident and taken all reasonable steps to prevent the resident from losing their home.

15. Equality, Diversity and Inclusion

- 15.1. Cornerstone has a duty under the Equality Act 2010 to “advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it”. We recognise residents can have vulnerabilities for reasons other than the protected characteristics. We will consider the needs of residents experiencing vulnerabilities and those with protected characteristics in delivery of our services and when assessing the potential impact of decisions we make.

16. Using vulnerability data

- 16.1. We will use vulnerability data in the following ways:

- to provide tailored customer focused services;
- cross referencing it with other data we hold, for example on properties, repairs, rent arrears, complaints and resident satisfaction to identify themes and patterns that could help us improve services;
- proactive engagement with residents through targeted tenancy visits where residents are identified as benefitting from additional advice or support or where they are at risk;
- identifying residents most likely affected by services, strategies or policies that need to be engaging in their development or review; and
- checking that Cornerstone and its assessments are representative and consider the needs of vulnerable residents.

17. Monitoring

- 17.1. Our success in achieving our objectives under this Policy will be measured in the following ways:
- Quarterly monitoring of satisfaction that residents are treated fairly and with respect and regular cross referencing of this with vulnerabilities.

- Volume of data held on vulnerabilities and use of the data in service design and delivery.
- Health & Safety Committee reviews of incidents involving residents affected by vulnerabilities (including numbers, actions taken, outcomes and learning).
- Reviews of equality impact assessments prior to tenancy enforcement.
- Reviews of evictions, abandonments or otherwise failed or failing tenancies involving a resident with vulnerabilities.
- Reviews of anti-social behaviour cases involving residents with vulnerabilities either as victim or alleged person (number of cases and outcomes).
- Reviews of complaints upheld based on a failure to support tenants with a vulnerability (numbers, outcomes and learning)
- Tenancy visits conducted in relation to vulnerabilities (number and outcomes)
- The number of residents with vulnerabilities engaging with us on service and policy reviews, including, but not limited to, our Resident Engagement Panel.
- Staff training completed that supports fair and equitable service delivery to residents with vulnerabilities.

Appendix 1 - Situations that can cause a person to experience a vulnerability

Situations could include the following. Experiencing something listed here may not in every case create a vulnerability. By meeting the needs of individual residents, we may be able to reduce or remove the vulnerability. For example, a person with a physical disability may not be vulnerable if they adapt to meet their needs.

- Health challenges and chronic illnesses
- Physical disabilities
- Learning disabilities
- Mental health conditions (diagnosed or undiagnosed)
- Financial hardship or financial instability
- Low income or unemployment
- Age-related frailty
- Social isolation and loneliness or a lack of social support networks
- Being dependent on others for safety and wellbeing (e.g. young children)
- Developing emotionally, cognitively and socially (e.g. young people)
- Raising a family with no or limited support from others
- Experienced or witnessed domestic abuse
- Homelessness
- Bereavement, loss and grief
- Language or communication barriers
- Cultural isolation or barriers
- Alcohol or substance use or dependency
- Discrimination and marginalisation
- Traumatic events or history of trauma
- Unstable childhood experiences
- Feelings of insecurity or low self esteem
- Educational disadvantages or low literacy levels
- Lack of access to technology and the internet or lack of support to use it.