

# Vulnerability and inclusive services policy

**Author:** Sarah Hopkins

**Contact:** [HousinComplianceTeam@luton.gov.uk](mailto:HousinComplianceTeam@luton.gov.uk)

**Version:** 1.0 (published)

**Last updated:** November 2025

## Contents

Contents .....	1
1. Purpose .....	2
2. Regulatory and legal standards.....	2
3. Responsibilities of landlord and tenant .....	2
4. Definitions .....	3
5. Policy statement.....	3
6. Identifying vulnerability .....	4
7. Recording vulnerability.....	4
8. Provision of services .....	5
9. Communications.....	6
10. Lettings .....	6
11. Rent arrears.....	6
12. Repairs .....	7
13. Antisocial behaviour (ASB).....	7
14. Protected characteristics .....	7
15. Capacity.....	7
16. Complaints .....	8
17. Compliance, monitoring and assurance .....	8
18. Equality, diversity and inclusion .....	8
19. Communications and accessible information.....	9
19.1. At sign-up and ongoing engagement.....	9
19.2. Accessible formats .....	9

19.3. Language and interpretation.....	10
19.4. Delegated authority and consent .....	10
19.5. Digital exclusion and offline access .....	10
20. Data protection .....	10

## 1. Purpose

This policy recognises the diverse and changing needs of tenants and communities in Luton over the course of their tenancy with us. It is designed to enable us to take appropriate steps to support tenants with higher or more complex needs and to consider these needs when delivering services, communicating, or supporting tenants to thrive in their homes, while maintaining our responsibilities as a social landlord. This policy will ensure we consider any reasonable adjustments we need to make in our services to ensure they are accessible to all.

## 2. Regulatory and legal standards

The Regulator of Social Housing sets out its expectations of registered providers (RPs) through the regulatory standards and consumer code of practice. The [Transparency, influence and accountability standard](#) states we must:

- treat all tenants with fairness and respect
- demonstrate an understanding of the different needs of tenants, including in relation to the equality strands and tenants with additional support needs
- demonstrate how we respond to those needs in the way they provide services and communicate with tenants

The [Housing Ombudsman Complaints Handling Code 2020](#) states we should comply with the [Equality Act 2010](#) and adapt normal policies, procedures or processes to accommodate an individual's needs where necessary, having a reasonable adjustments policy in place to address this.

The [Care Act 2014](#) defines vulnerability in the context of safeguarding, whereby an adult has needs for care and support and/ or is experiencing, or is at risk of, abuse or neglect, and, as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

We have a duty under the [Equality Act 2010](#) to advance equality of opportunity between those who share a relevant protected characteristic and those who do not share it.

## 3. Responsibilities of landlord and tenant

Under this policy our responsibilities are to:

- ensure that tenants experiencing vulnerability receive the services and assistance they require to thrive in our homes
- provide staff with the right skills and capabilities so they understand how their role contributes to ensuring fair outcomes and treatment of vulnerable tenants and ensuring they have the tools to recognise, record and respond appropriately to vulnerable tenants' needs, including the ability to escalate where our standard procedures do not provide the right outcome for vulnerable tenants

- record any vulnerabilities on the tenant's record and keep this up to date and make this information available to front line colleagues
- use all available information to identify if a tenant is experiencing vulnerability
- take account of known vulnerability factors in the provision of services and in decisions around tenancy management and enforcement
- assist vulnerable tenants in accessing additional services that they may need
- make it easy for tenants to disclose their needs through the right systems and processes and help staff spot signs of vulnerability
- record any known representatives who act as a 'delegated authority' or with power of attorney to act on the tenant's behalf
- consider any additional needs due to the vulnerability and where appropriate vary our service delivery to ensure vulnerable tenants still receive the same level of service

Responsibilities of the tenant are to:

- keep us updated with any changes in their household that affect their ability to sustain their tenancy. this may include issues related to age, ability, mental health, physical health, financial issues, loss or change of employment, accident or sudden tragedy, fire or flood, new emergency caring responsibilities, bereavement, domestic abuse, poverty, etc
- be honest about capabilities and needs at the earliest opportunity
- consider resources and support available in their personal, social and organisational contacts, whether formal or informal, that they can call upon to achieve their goals

## 4. Definitions

**Vulnerability** – we define 'vulnerable' in relation to the provision of housing services as: Tenants who have a particular characteristic, experience and/or exceptional life event that means they are currently unable to act independently and/or are unable to cope with managing their tenancy without additional support. This may be exacerbated if we do not act with appropriate levels of care to better support a vulnerable tenant but with reasonable adjustment the vulnerability may be reduced.

## 5. Policy statement

We recognise that each of us can experience vulnerabilities at any time of our lives, meaning the lives and needs of all our tenants will evolve and change over time.

This policy aims to:

- give assurance of compliance with regulator of social housing's transparency, influence and accountability standard
- be fair, easy to understand and administer
- minimise and prevent homelessness where this does not compromise our duty of care towards others
- recognise the changing needs of tenants and provide the ability to respond sensitively and appropriately when required

- be responsive, adaptable and reasonable so we can better meet the individual needs of tenants experiencing vulnerability
- provide for making reasonable adjustments to our service provision
- ensure that no tenant suffers any disadvantage because of their vulnerability
- assist tenants experiencing vulnerability to continue to access and benefit from our services, and continue to sustain their tenancy during times of difficulty
- provide a framework for a fair, consistent approach that ensures we maintain our landlord responsibilities in a reasonable way

This policy focuses on tenants who are experiencing vulnerability but have capacity to make their own decisions. Where a tenant 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 7.

## 6. Identifying vulnerability

A tenant who is experiencing vulnerability may be identified by:

- Themselves or others in their social circle when they apply for housing or contact us, or self-refer
- any council colleague who has contact with tenants in person, on the phone or through any other channel of communication
- our contractors
- a referral from an external agency or organisation

We expect all our colleagues to be aware of the possibility that a tenant may be experiencing vulnerability e.g. from information they receive or from their own observations during routine work such as home visits or during a conversation over the telephone.

We'll provide training to all staff delivering housing services on how to develop professional curiosity, so they are able to recognise potential signs of vulnerability such as:

- antisocial behaviour as a result of mental health issues
- being a victim or perpetrator of antisocial behaviour, harassment or domestic abuse
- 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 tenant previously had a good payment history
- a history of high numbers of repairs and recharges

## 7. Recording vulnerability

It's an expectation of the Regulator of Social Housing that we know and understand our tenants and their needs. This means we should be keeping relevant records on tenants' vulnerability to enable us to identify any trends or new service needs.

We'll collect information about the vulnerability of our tenants and their families and hold it on our database housing IT system so that it is accessible to those who need to see it to provide landlord services.

The information we record will include any known vulnerability, any communication or access needs and whether there is anyone with delegated authority to speak to us on the tenant's behalf such as a care or support worker.

We'll ensure that our tenant records are factual, accurate and written with empathy. This will ensure our colleagues will have advance knowledge of any additional factors to consider when delivering services.

We'll carry out regular tenancy audits and reviews of our information to keep the data we hold relevant and accurate.

Any reasonable adjustments residents may require as a result of their vulnerability will be recorded.

We'll agree with tenants a date to review and close this record, in recognition of the changing nature of some vulnerabilities. We reserve the right to keep anonymised information to enable us to review and plan services to ensure our services remain relevant to the general needs of our tenants.

Safeguarding concerns will be raised in line with our Safeguarding Policy which sets out how we identify and support vulnerable adults and children at risk, and ensure statutory agencies are involved immediately when we have a concern.

## 8. Provision of services

We don't apply "blanket definitions" of vulnerability, meaning we don't assume that someone is vulnerable just because they're, for example, older or disabled or living alone. Instead, we aim to be flexible and responsive and ensure we consider individual needs of all our tenants through our standard operating procedures.

We'll provide practical support and advice to tenants experiencing vulnerability as well as signposting to dedicated support services and having a robust safeguarding referral process.

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

- allowing longer for tenants to answer their door when we call for an appointment
- providing spaces that feel safe to a tenant
- offering quiet rooms and low stimulation environments for meetings
- giving priority for tenants with heating breakdowns if they are undergoing medical treatment
- visits in person where we would normally provide a phone service
- explain a letter over the phone in addition to sending it
- provide or refer for additional support for an antisocial behaviour perpetrator with mental health issues instead of enforcement action
- applying for an injunction / partial closure order instead of possession action when the tenants' vulnerability would make it extremely difficult for them to secure suitable alternative accommodation should we take possession/full closure order

- recognise where a tenancy management issue is due to vulnerability and refer to our in-house support e.g. hoarding
- provision of alternative communications, interpretation, or support from advocates, appointed persons or informal support agencies where needed

Where tenants have proposed an alternative contact / advocate for support, we'll always check in with that person to ensure they're willing and able to do so.

## 9. Communications

Tenants are asked about any communication needs when they attend the tenancy sign up and at other opportunities during their tenancy. In line with this policy, we'll normally expect the tenant to have made arrangements to communicate effectively, but in some exceptional circumstances where not to do so would severely disadvantage the tenant, we will consider making documents available in other languages and formats such as large print and audio or engage a British sign language interpreter.

Tenants can also ask that correspondence is sent to someone who has 'delegated authority' to act on their behalf – we will check with this person they are consenting to this, and to the sharing of their information.

Tenants can also inform us of vulnerabilities during any point of contact with us as well as online.

## 10. Lettings

When allocating our homes, we will review any information we receive on vulnerability to help us ensure any offer of housing is right for the individual and their family, as a commitment to longer-term tenancy sustainment. We'll require confirmation from a medical professional or other support agency of the tenants' circumstances before giving any additional priority due to vulnerability in line with our allocations policy.

Any prospective tenant, in deciding to enter a tenancy agreement must be able to understand:

- their obligation to pay rent as a tenant and to occupy and maintain the interior of the property
- the landlord's obligations, e.g. to maintain the property
- that failure to keep to the terms of the tenancy agreement may mean they could be evicted

When we let a home, new tenants will be given the opportunity at the tenancy sign up to tell us about the needs of any vulnerable household member and any existing care and support services received.

## 11. Rent arrears

All tenants must pay their rent on time, and we will advise and support those who are struggling to make these payments. We recognise that many vulnerable tenants may well have other money problems and difficulties with budgeting; we will refer tenants and/or their carers who approach us for help or who fall into arrears to our income team to ensure the tenant is maximising their income, supported in managing their budget, and has a realistic plan to repay their rent and arrears.

## 12. Repairs

We recognise that tenants experiencing vulnerability may find it more difficult to cope if something goes wrong in their home and they need a repair. When a tenant contacts us to request a repair, the contact centre will confirm if there are any disabilities or support needs which should be considered. This should be recorded on the tenant record so that the service can be delivered appropriately, aligned to the needs of the household.

## 13. Antisocial behaviour (ASB)

We'll always investigate reports of ASB which involve domestic abuse, hate crimes and harassment. These are criminal behaviours so we'll work closely with police to support tenants who experience these as well as those who are victimised or taken advantage of because of a disability or other vulnerability.

We'll also consider any vulnerabilities which an alleged perpetrator may experience.

We recognise that some tenants may act in an anti-social way due to behaviours related to their vulnerability, and we'll try to engage with them and any relevant support services and carers to improve the situation before taking any tenancy enforcement action.

However, we do have to balance the safety and wellbeing of neighbouring residents with the wellbeing of the vulnerable ASB perpetrator in considering the most appropriate response.

## 14. Protected characteristics

Under the [Equality Act 2010](#), we must 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 and 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 any enforcement action under the terms of a tenancy or lease to avoid any inadvertent discrimination.

In managing tenancies and leases and delivering services, we will consider whether our decision would have an unfair or disproportionate impact on the tenant compared with another tenant who does not have a protected characteristic. In particular, where possession action is being considered, we will ensure that pre-action consideration is given to:

- whether the tenants' behaviour, actions or lack of action is related to their protected characteristic
- whether the behaviour is putting the health and safety of others at risk e.g. neighbours
- alternatives to possession action and why they were not suitable
- whether possession action is justifiable and a proportionate means of achieving a legitimate aim
- whether the effect on the occupier is outweighed by the advantages of our action

## 15. Capacity

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

## 16. Complaints

Tenants will be informed of their right to make a complaint within 12 months of becoming aware of an issue if they think we or any council employee/representative has:

- done something wrong
- behaved unfairly or not politely
- not carried out a service to an agreed standard; or
- not responded to a request for a service within our stated timescale

Complaints should relate to conduct or timescales, rather than the substance of any decision

We have a complaints process that is compliant with the [Housing Ombudsman Code of Practice](#) for complaints, full details can be found on our website [Comments, compliments and complaints](#)

Our complaint process allows for further escalation to the Local Government and/or the Housing Ombudsman service if the tenant remains unhappy with the outcome of a stage 2 complaint.

## 17. Compliance, monitoring and assurance

Compliance with this policy will be monitored by periodic reviews of case records by the relevant team manager. We will provide assurance on the proper implementation of this policy through regular self-assessment, internal audit, performance management, quality assurance of compliance with procedures and our risk monitoring work.

We will keep this policy under review and may amend or replace it from time to time, for example due to legislative or regulatory changes, but will not change the substantive rules in it more than once in every 5 years (unless required to do so by law).

Prior to finalising and adopting this policy, we consulted with tenants as to its contents via the tenant partnership board.

The policy was approved through the democratic process and adopted by the council at the meeting of the executive 6 October 2025.

## 18. Equality, diversity and inclusion

We're committed to promoting equality, eliminating discrimination, and advancing opportunity for all tenants, in line with the [Equality Act 2010](#) and our public sector equality duty (PSED).

We'll apply this policy fairly and consistently, ensuring no tenant is disadvantaged, directly or indirectly on the basis of any protected characteristic, including:

- age
- disability
- sex
- gender reassignment
- sexual orientation

- race (including ethnicity, colour, and nationality)
- religion or belief
- pregnancy and maternity
- marriage and civil partnership

We'll apply this policy in a way that is fair and consistent to all tenants with all exceptional decisions recorded on the register of exceptional decisions.

This policy has been subject to an equalities impact assessment which determined this policy does not directly or indirectly discriminate against any person or group of people because of their race, religion/faith, gender, disability, age, sexual orientation or any other grounds which are set out in our equality and diversity policy or are a legally protected characteristic.

We'll ensure this policy, and any supporting procedures do not create an unfair disadvantage for anyone, directly or indirectly through the EIA process.

We'll advise tenants that equalities information will be collected to enable a better understanding of peoples' housing needs and to ensure that no one is discriminated against as a result of the way this policy has been framed, or during the administration of it. Tenants will be informed as to how such data will be used, handled, and stored.

We also recognise the impact of socioeconomic disadvantage, digital exclusion, and intersecting inequalities, and commit to taking a proportionate, trauma-informed approach wherever needed.

To ensure compliance and transparency:

- this policy has been subject to a full equality impact assessment (EIA)
- all exceptions to standard practice will be recorded on the register of exceptional decisions, with a clear rationale
- we'll monitor how this policy is applied and analyse outcomes to ensure no group is unfairly impacted in practice
- equalities data will be collected sensitively and used to tailor services, support monitoring, and improve outcomes

Staff will receive appropriate training to apply this policy in a non-discriminatory, inclusive, and culturally competent way. We'll regularly review and update our approach to reflect tenant feedback, changes in legislation, and emerging best practice in housing equality.

## 19. Communications and accessible information

We're committed to ensuring all tenants can access, understand, and engage with housing services regardless of their language, literacy level, disability, or communication preferences.

### 19.1. At sign-up and ongoing engagement

All tenants are asked about communication preferences and access needs when they first sign up to a tenancy and at key points during their tenancy lifecycle. These needs are reviewed regularly and at any point the tenant wishes to update them.

### 19.2. Accessible formats

Where standard communication would place a tenant at a disadvantage, we will provide information in alternative formats, including but not limited to:

- easy read
- large print
- audio
- braille

- British sign language (BSL) interpreter
- video relay services
- subtitled or translated video content

### 19.3. Language and interpretation

We will offer translation or interpretation services for tenants whose first language is not English, including telephone-based and in-person interpreters where required. Translated summaries of key documents will be available in the most commonly spoken community languages in Luton.

### 19.4. Delegated authority and consent

Tenants may nominate a trusted person (with delegated authority) to receive correspondence or manage tenancy communications. We will confirm the nominated person's consent to receive and manage information, in line with data protection and safeguarding guidelines.

### 19.5. Digital exclusion and offline access

While many services are available online, we acknowledge that not all tenants have reliable internet access or digital confidence. All policies and procedures will be available in non-digital formats, and assistance will be provided to those needing help to complete digital tasks.

- **Multiple channels:** information and correspondence may be provided via letter, phone, email, secure messaging, or in person, depending on tenant preference and service availability.
- **feedback and continuous improvement:** tenants are encouraged to provide feedback on the accessibility of our communications, and we regularly review our approach in line with best practice and tenant input.

## 20. Data protection

We will hold all information about tenants in a secure manner in line with data protection legislation applicable to us.

We are subject to the information disclosure requirements of the [Data Protection Act 2018](#). The administration of this policy will ensure compliance with this legislation. For further information please reference our [Data Protection policy](#).

Tenants will be advised of their right to make a complaint to the office of the information commissioner if they believe we has failed to fulfil its obligations and responsibilities as set out in the [Data Protection Act 1998](#).