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1. Purpose

This policy sets out the approach that Lewisham Council's Housing Service will take to identifying, assessing, and recording information regarding Council tenants, leaseholders, and others accessing our services who may have vulnerabilities. This in order to provide services which may be adjusted to consider such needs, where practicable.

2. Definitions

- 2.1 For the purposes of this document, we define a vulnerable resident as one who has a condition, disability, or a personal circumstance, which means that without support or intervention, any of the following may be true:
- they are at higher risk of abuse or neglect
 - there is detriment to their overall wellbeing¹
 - their tenancy is put at risk
- 2.2 We include in this definition, people who receive or need additional care and support services. We recognise that not everyone who has a disability is vulnerable under the definition of this policy. However, we also recognise that vulnerability is not always permanent, and that a person's needs may change over time.
- 2.3 We recognise the importance of good communication in helping us to understand and respond to the needs of an individual. We will record known vulnerabilities, disabilities, circumstances, as well as communication or access needs that we are made aware of. We will encourage residents to share this information with us and keep it up to date. This in turn will enable residents to better access services, and enable our staff to make appropriate adjustments when delivering services. For example, whether we should provide important safety information in a specific format like Braille or large print.

¹ More information may be found in our Safeguarding policies



- 2.4 For the purpose of this document, we define an accessible service as one that someone with a disability, communication, or access need, can use, receive benefit from, and engage with, in a substantially similar amount of time and effort as someone who does not have such a need.
- 2.5 We will handle and process personal data about vulnerability in accordance with the current Data Protection Act, General Data Protection Regulations, and our Data Protection Policy.

3. Context and aims

- 3.1 As a responsible social landlord, our key objective is to ensure that vulnerable residents receive the services and support they need to sustain their tenancy.
- 3.2 This links to our Corporate Plan which acknowledges inequalities and sets out its aims to address some of these. Our Housing strategy also considers those who may have certain support needs, and sets one of its priorities to strengthen communities and embrace diversity.
- 3.3 In assisting residents to sustain their tenancies and access our services, we will comply with the Equality Duty, and we aim to:
- Increase resident satisfaction levels and confidence in our services
 - Make good use of partnerships to meet resident needs, building and maintaining a good reputation with our partners
 - Reduce the need for enforcement action
 - Become better at recognising and responding to potentially 'hidden needs'
 - Provide high quality services that are accessible
 - Increase participation and engagement by vulnerable residents
- 3.4 While this policy applies in principle to all residents of Lewisham Council's directly managed housing service, some services and support may be specific to different types of tenure, or different situations. For example, some types of assistance may be exclusive to tenants rather than leaseholders, or to potential tenants.

4. Identifying vulnerability

- 4.1 We can become aware of a resident's vulnerability where:
- They tell us (self-identify)
 - Information is provided by an external organisation or a non-housing partner service, e.g., social care, a support provider or advocacy service.
 - Information/concerns are fed back to us by a member of staff or one of our contractors
 - Concerns are raised by family or neighbours
- 4.2 Staff delivering services to residents receive training to recognise potential signs of vulnerability such as:
- Antisocial behaviour or unreasonable behaviour that may be linked to mental illness
 - Someone being a victim of antisocial behaviour, or domestic abuse



- A resident having a large debt or credit on their rent account
- Self-neglect, Hoarding, or poor property condition
- Not reporting repairs, granting access requests, responding to correspondence, or otherwise making contact with Lewisham Council's Housing Service
- Limited understanding of the English language, verbal or written, preventing them from communicating effectively with Lewisham Council's Housing staff and/or other departments or agencies

4.3 We recognise that most of the time a simple solution based response to adjust for a vulnerability will not be at the same threshold as Safeguarding. Where a Safeguarding concern is identified, this will be reported promptly, in line with our Safeguarding policies and processes.

5. Communication and provision of services

5.1 For each service we deliver, we will consider what additional support, consideration or adjustment in service might be appropriate for vulnerable residents.

5.2 Some basic principles of this approach include:

- Making sure that correspondence is provided in an appropriate language/ format.
- Making personal contact with vulnerable residents where appropriate rather than relying on written communication.
- Working collaboratively with known support services.
- Referring or signposting residents for appropriate advice and/or support and following up on referrals.
- Checking the resident's understanding of their situation, rights and responsibilities, and the consequences of action or inaction on their part.

5.3 Appropriate adjustments could include, but are not limited to:

- Providing translation or interpretation services
- Carrying out repairs more urgently
- Sending communication in large text or braille
- Providing minor adaptations to properties
- Carrying out a home visit or arranging a meeting over the phone or online
- Allowing longer for a resident to come to the door
- Carrying out an equality assessment when considering legal enforcement action

5.4 We recognise that the circumstances, preferences and needs of each person are different. Where it is possible, we will try to ensure services have the ability to be adjusted to the needs of an individual, and in collaboration with them.

5.5 We will proactively work to improve services through:

- Using good practice case studies and lessons learnt from cases to train/inform staff.
- Using information on our records about the needs of vulnerable residents to plan and provide future services and support.
- Using data we hold to identify residents who may be vulnerable.

5.6 It may sometimes be necessary for the Housing Service to take legal action against a resident we know or suspect to be vulnerable. Where legal action against a vulnerable



resident is considered, we will do so proportionately, following appropriate offers of assistance and support.

6. Partnership working

6.1 As a responsible landlord, we recognise the importance of taking a multi-agency approach to assist a resident where appropriate. We will work with partner services and organisations to provide a co-ordinated approach through:

- Service level agreements and information sharing protocols, including throughout the wider council
- Referrals to support providers and/or statutory services, and feedback processes to follow up the outcomes of referrals
- Signposting residents to support services, advocacy and advice agencies
- Arranging and attending professionals meetings, as appropriate

7. Monitoring and controls

7.1 This policy will be implemented through supporting procedures and communications to staff. All staff will be responsible for implementing the policy in line with their roles.

7.2 We will:

- Conduct periodic quality checks as set out in procedures.
- Analyse the application of the overall policy for performance and trends and make recommendations where services could be improved.

8. Legislation and regulation

Associated legislation and regulation includes, but is not limited to:

- Equality Act 2010
- Data Protection Act 2018
- Housing Act 1985
- The Mental Capacity Act 2005
- Care Act 2014

9. Equality, diversity, and inclusion

10.1 An Equality impact assessment was conducted as part of the development of this policy. We considered the demographic information we hold about our residents, and the limitations and variation in information we hold.

10.2 While this policy replaces a previous version, we assessed it to have potential to make a further small positive impact for some protected characteristics. This is in particular for those with disability, impairment, or long term health condition, and for older residents.

10.3 We also considered the impact on residents who have limited English or literacy, and where these could compound other vulnerabilities by limiting an ability to access a



service or communicate a circumstance or need. It was therefore important to ensure this policy is clear and easy to understand, and that procedures are in place to support those with limited language or literacy to access services. We will provide the option to interpret this policy as part of the way we communicate it.

10. Communication and consultation

- 11.1 The development of this policy has included consultation with residents.
- 11.2 This policy will be available on our website, and available for staff on our internal shared site along with procedures for implementing it. A hard copy of the policy can be made available on request.
- 11.3 Complaints regarding the application or handling of this policy will be managed in accordance with our complaints policy.

Replaces: Vulnerable Residents Policy 2023 (Lewisham Homes) Minor updates to reflect the return of landlord services previously managed by Lewisham Homes to Lewisham Council	
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