

VULNERABILITY POLICY

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1. Introduction

At Citizen, we are committed to providing fair and equal access to our services for all customers. We understand that some individuals may face vulnerabilities that require us to adjust how we deliver services. This could include changing or deviating from our usual processes or procedures, the timescales we set for a service, or the standard of a service. We are committed to making reasonable adjustments where needed and ensuring our colleagues are trained and equipped to recognise vulnerability and respond appropriately.

Our approach is firmly aligned with the Equality Act, supporting inclusive and accessible services for all.

This Policy applies to anyone who may need additional support due to living with a disability or long-term illness, relying on specialist medical equipment, age or another protected characteristic. While some vulnerabilities may be linked to protected characteristics under the Equality Act, vulnerability can affect anyone and may be temporary or change over time.

There may be times when our customers are experiencing one-off life events for example a bereavement or a relationship breakdown, recovering from hospital treatment or living independently for the first time. If customers make us aware of these events in contacts to Citizen we may consider a change in service.

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2. Scope

The Policy objectives are to:

- Consider vulnerability in the delivery of our services.
- Recognise and respond to vulnerability.
- Assist customers with a vulnerability in accessing appropriate services.
- Maintain up to date records of vulnerabilities.
- Make Safeguarding referrals where necessary.
- Provide tailored services or a response where we consider that a customer might be at risk.

This Policy applies to customers who are vulnerable but capable of making their own decisions. If a customer has a legally nominated individual to act on their behalf, we will deal with their designated legal representative.

2.1 The Legislation and Regulations we follow

The Equality Act 2010 (the Act) establishes the legal framework to protect individuals' rights and ensure equal opportunities for everyone. It mandates that we make reasonable adjustments when providing services to disabled individuals. This duty is anticipatory, meaning we must proactively consider and anticipate the needs of disabled people.

In addition, reasonable adjustments are required by:

- The Regulator of Social Housing
- The Tenancy Standard and Neighbourhood & Community Standard
- The Housing Ombudsman's Complaint Handling Code

3. Policy detail

3.1 Defining vulnerability

When assessing the needs of our customers, we will consider whether they are at a disadvantage or at risk of harm. Where appropriate, we will explore and may implement reasonable adjustments or changes to the way we do things to help reduce or remove that risk. We will record this information against the customer record when it is disclosed by a customer and in line with the Data Protection Act.

To capture what we mean by vulnerability Citizen record customer vulnerabilities within our secure CRM system . The below sets out the categories we use, where we believe that we may need to adjust how we deliver a service, the standard of service and/or how we communicate with our customers:

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Physical Disability

- Dexterity
- Mobility
- Stamina or Breathing or Fatigue

Sensory and communication

- Hearing
- Vision
- Speech Impairment

Neurodiverse

- Learning or Understanding or Concentrating
- Memory
- Mental Health
- Social or Behavioural

Ongoing recovery from severe or long-term illness.

3.2 Protected Characteristics

The Equalities Act 2010 sets out the protected characteristics that all organisations must consider when providing services. These are.

- Age
- Disability
- Gender re-assignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion/belief
- Sex
- Sexual orientation

We will consider protected characteristics when disclosed by a customer and while a protected characteristic does not automatically make someone vulnerable, there may be occasions where the protected characteristic/s may increase their risk of harm and vulnerability.

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3.3 Short term life events

Some customers may experience temporary challenges due to significant life events, such as:

- Bereavement
- Domestic abuse
- Recent homelessness
- Debt or financial difficulties
- Short-term serious illness (up to six months)

These situations, while temporary can increase the risk of harm or disadvantage and require Citizen to adjust the way that we deliver services, contact the customer or modify the standard of service. These short-term life events are not recorded on our systems as vulnerabilities.

Examples of life events and possible adjustments can be found in Appendix 1.

3.4 Identifying vulnerability

We recognise that some customers or members of their household may have vulnerabilities that require additional support or adjustments to our services. We ask customers to tell us about their long-term vulnerability, and they are encouraged to keep their information up to date through the customer portal to ensure we have the most up to date information and can continue providing the right support. We have a range of interventions to check and validate that the data remains accurate.

We will sometimes become aware of a customer's vulnerability from a third party, for example an Occupational Therapist. In these cases, we will seek customers consent to record their vulnerability on our system.

To help us identify customer vulnerabilities, we provide several opportunities for customers to share this information, including:

- During the pre-tenancy process
- During home visits or tenancy management checks
- Through self-referrals or reports from family, friends, or Citizen colleagues
- We ask all our contractors or and partner agencies to notify us of any potential vulnerabilities so we can discuss these with the customer.

We ask customers to tell us about their vulnerability, and they are encouraged to keep their information up to date through the customer portal to ensure we have the most up to date information and we can continue providing the right support.

Where appropriate, we may offer referrals to external agencies or provide support through our internal support and tenancy sustainment services.

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When a customer confirms a vulnerability, we will:

- Record the information securely in our CRM system
- document communication needs discuss any other reasonable adjustments.
- Put in place safety measures where necessary, such as joint visits, and apply the Personal Vulnerability (PV) marker.
- Review and update vulnerability information at regular interactions and tenancy checks.
- In addition, we may:
 - Refer customers to our tenancy sustainment services.
 - Make Safeguarding referrals or liaise with external agencies if needed.
 - Consider the impact of vulnerabilities before proceeding with any enforcement action.

We report on our performance in supporting vulnerable customers to the Board on a quarterly basis.

3.5 Reasonable adjustments

Changes we make to our service will assist us to support our vulnerable customers to access and use our services effectively and fairly.

Adjustments will come in a variety of forms. They may be minor alterations to the home, changes to policies, procedures or service delivery. It could also mean adjusting how we communicate with customers. We offer a variety of support options for vulnerable customers, with services tailored to specific needs across different areas.

For example, Citizen provides a range of communication methods for customers, including digital, interpreters, Braille, and large print. These preferences are recorded in our CRM system.

- **Appointments**

Vulnerable customers are given extra time for appointments, such as additional time for answering the door or extended appointment slots for tenancy checks.

- **Repairs**

Repairs can be prioritised for vulnerable customers, especially if the repair presents an increased risk of harm. However, vulnerability alone does not guarantee automatic prioritisation of repairs.

- **Rechargeable and Non-Standard Repairs**

For repairs that fall outside our standard service, vulnerable customers may request a rechargeable repair, and where appropriate we will recharge the customer.

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Exceptions are made for some customers, for example if they are at risk of domestic abuse.

- **Enforcement Actions**

When taking enforcement action for issues such as arrears, anti-social behaviour, or other tenancy breaches involving vulnerable customers, we ensure that all necessary support has been offered before progressing any cases.

- **Tenancy Support**

Citizen provides various tenancy support services to help vulnerable customers maintain their tenancy. This is a referral service and supports some vulnerable customers by providing money advice and digital inclusion support.

- **Lettings**

When allocating homes, we consider any information about a customer's vulnerability to ensure that housing offered is suitable for them and their family, supporting long-term tenancy success.

4. Engagement

As part of the policy review process, customer engagement was undertaken through structured surveys and interviews. The draft policy was subsequently submitted to the Citizen Customer Assurance Committee who recommended its approval to Board.

5. Roles and responsibilities

- Managers are responsible for ensuring staff training and compliance with policies.
- All colleagues must recognise and respond to vulnerabilities, complete any required training for their roles, and provide accessible information and referrals.
- Contractors are expected to adjust their services as requested by Citizen.
- Customers should inform us of any changes in their circumstances and engage with Citizen's service.
- Customers should inform us of any changes in their circumstances via the customer experience centre or update what they can on the customer portal.

It is the responsibility of the Board to seek assurance that this Policy is successfully implemented. The Senior Leadership Team and Heads of Service are responsible for ensuring the effective implementation of this Policy and that all staff understand the importance of this Policy, the related procedures and that they comply with them.

Any changes to this Policy must be made in line with the requirements set out in Citizens Standing Orders and our Policy framework.

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6. Monitoring and review

This Policy will be fully reviewed every three years and be subject to an interim review during the Policy period.

The Policy is available to customers via the website.

7. Equality impact assessment

This policy reflects Citizen's values, and as such, our staff and others covered by the scope of this policy are committed to not discriminate against any individual or groups and will respect the diversity of the communities with which we work. We will adhere to our statutory obligations set out in the Equality Act 2010.

In framing this policy, our staff are committed to not discriminate adversely against any group and will respect the diversity of the communities we are working within.

The Belonging & Inclusion Strategy sets out our commitment to improving the lives of all our customers and making our society a better place for everyone. We want to ensure that all our customers have a meaningful voice, and that we provide them with the best customer experience. In line with our legal and regulatory duties we must ensure that the services we provide are accessible, and where possible are tailored to the individual needs of our customers.

An Equality Impact Assessment has been completed for this policy.

8. Version control

EVERY change made must be logged in the version control and ALL boxes completed.

VERSION	DATE	AMENDMENTS	APPROVED AT/BY	REVIEW
V 1.0	2020	New policy	Board	2023
V2.0	June 2025	Included examples of long and short term vulnerabilities and reasonable adjustments	Board	June 2028
V3.0	November 2025	Clarity on what is a vulnerability and what is a short-term life event	Policy Owner	June 2028

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Appendix 1

SHORT-TERM LIFE EVENTS	TYPES OF ADJUSTMENT
BEREAVEMENT	Referrals to support. Support around succession. Review of succession rights for long-term vulnerable customers.
FINANCIAL HARDSHIP	Referrals to money advice and tenancy sustainment. Additional support through arrears process. Extra time to clear debts before taking possession action.
DOMESTIC ABUSE	Support from domestic abuse team. Offer non-standard repairs where safety is at risk.
RELATIONSHIP BREAKDOWN	Support for arrears and tenancy changes.
CARE LEAVERS	Pre-tenancy support to understand right and responsibilities. Ongoing tenancy sustainment as needed.

VULNERABILITIES	TYPES OF ADJUSTMENT
PHYSICAL DISABILITY	Offering adaptations. Additional time for appointments. Prioritising repairs when there is a risk to health. Please refer to Aids and Adaptations policy.
HEARING OR VISUAL IMPAIRMENT	Offering a range of alternative communications methods.
SEVERE OR LONG-TERM ILLNESS	Taking extra hygiene measures like wearing masks when attending appointments.
LEARNING DIFFICULTIES	Making communication available in easy read. Working with advocates or carers to support their tenancy.
LOW LEVELS OF LITERACY OR NUMERACY SKILLS AND LANGUAGE BARRIERS	Offering translation services. Longer appointment times facilitate translators or extra time to explain written documents i.e. tenancy agreements. Offering easy read versions of communications. Support from tenancy sustainment.

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