

Vulnerability Policy - Housing & Property Management

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1. Purpose

To set out our definition and person-centred approach to vulnerability in Housing & Repairs services.

2. Scope

This policy is relevant to all Camden Housing and Property staff and contractors responsible for carrying out landlord services.

It is relevant to Camden social housing tenants and prospective tenants.

3. Definitions

Vulnerability means a situation where a resident or household faces barriers to accessing our housing and property service, which could lead to disadvantage. Vulnerability may not be a fixed state. Through collaboration and inclusion, we aim to reduce vulnerability and enable residents to thrive in a safe, supportive, and resilient housing community.

Vulnerability is understood relationally, recognising the strengths, resilience, and potential within every person.

Disadvantage means a significant negative impact on the chances of securing, sustaining, and/or maintaining safe, suitable, and/or affordable housing due to barriers to services. We extend the Equality Act 2010 understanding of disadvantage, recognising the impacts of intersectionality and that factors other than protected characteristics can also increase the likelihood of a person or household facing barriers to services.

Disproportionality in this policy means the unequal distribution of resources and services among different demographic groups, particularly disparities in access to Housing and Repair services.

Multiple disadvantage under this policy refers to experiencing several intersecting and mutually reinforcing challenges, such as combinations of mental ill health, homelessness, drug and alcohol, criminal justice involvement, family breakdown, domestic abuse, and gender-based violence. Tenants or households experiencing multiple disadvantage may also experience a combination of other social, economic, or personal factors set out in this policy.

Responding to multiple disadvantage requires a systemic, whole person and anti-oppressive approach, taking account of the full picture of a person's needs, strengths, and potential.

Intersectionality refers to how the effects of multiple forms of discrimination (such as racism, sexism, and classism) overlap or combine in different ways to affect residents' lived experiences.

The social model of disability reflects disabled people's lived experience and puts forward a radical and practical approach to ending disabled residents' exclusion that does not require disabled residents to change who they are to be entitled to the same rights and opportunities as non-disabled people. The Social Model of Disability recognises that people can be 'disabled' by barriers in society, and therefore, the focus should be on removing these barriers.

Equity means fair and just, especially in a way that takes account of and seeks to address existing inequalities.

Team Around Me (TAM) is a collaborative model, designed by the Single Homeless Project, for holding case conferences or multi-agency meetings for people experiencing multiple disadvantage, putting the person at the centre of their support.

4. Roles and responsibilities

As a social landlord, we have an important responsibility to support tenants experiencing vulnerability and promote their safety and well-being. We manage tenancies, repairs and maintenance in line with the relevant legislation (see section 8) and make reasonable adjustments as required by the Equality Act 2010.

Effective communication, collaboration, and participation with residents, guided by Consumer Standards and our We Make Camden missions, help us understand and work with tenants to meet their needs.

Housing and Property Management services also work with other services and agencies to provide person-centred support, in line with the Care Act 2014, and have safeguarding responsibilities.

Compliance with requirements, including the Human Rights Act 1998, Equality Act 2010 and standards set by the Regulator of Social Housing, is central to our approach to vulnerability, which broadly aims to promote overall well-being and housing stability through equitable access to our services.

5. Policy statement

We aim to enable Camden tenants to have equitable access to Housing and Property services. This policy sets out our approach to empowering residents and working together to break barriers to our services, aiming to reduce the impact of vulnerability, disproportionality, and disadvantage. Where vulnerability is identified, we collaborate with residents in a strengths-based way to overcome barriers, build resilience, and promote independence.

This policy also reflects our commitment to the social model of disability.

5.1 Person-centred vulnerability framework

To reduce vulnerability, empower residents to build on strengths and enable equitable access to housing and property services we aim to:

- **Understand** and know our residents relationally.
- **Consider** relevant factors that might impact a tenant's experience of housing
- **Identify** the barriers and strengths a tenant might be experiencing
- **Empower** tenants' strengths and support them to overcome barriers by taking collaborative action and making reasonable adjustments.
- **Enable** equitable access through tenant engagement and working well together.

This policy sets out how we aim to apply this framework in the context of the 3 Rs: Recognise, Record, Respond.

5.2 Recognise

We aim to recognise vulnerability by understanding our tenants, considering relevant factors in context, and identifying barriers the resident or household may face and

whether they could lead to disadvantage without reasonable adjustments. We also aim to identify strengths and practical solutions that could help break barriers.

There are many ways relevant factors and barriers can be identified, including through:

- self-reporting
- referrals from or information sharing with other services or agencies
- reviewing case notes
- attending professionals or multidisciplinary meetings
- conversations with tenants at key "touchpoints" such as assessments or home visits
- noticing possible indicators e.g. frequent no-access, cluttered homes, or frequent reporting of repairs

Understanding residents

As part of our relational approach, we aim to know our residents and see the whole picture when working with tenants and their households, including relevant factors, barriers faced, and their strengths.

We encourage residents to share with us any information about relevant factors, barriers or practical ways we could support access so that we can tailor our services appropriately and adjust the way we work.

Considering relevant factors in context

Some factors may be more relevant to some services and situations than others, and the adaptations we make will depend on considering those factors most relevant to the service or situation. By considering those factors in context, we aim to identify the barriers a resident or household may be facing at the time and collaborate to overcome them.

Some of the factors we may consider include:

- **Life events** e.g. care experience, pregnancy domestic abuse or gender-based violence (DVA), current/recent suicidal ideation, hate crime or discrimination
- **Life circumstances** e.g. terminally ill, disability, respiratory condition, transgender, refugee or asylum seeker, learning disability, managing debt
- **Housing factors** e.g. overcrowding, damp and mould, criminal activity in home or block, utilities off, insanitary conditions, rent arrears

We also consider intersectionality and the impact of multiple disadvantage, as well as maintaining an awareness of and respect for cultural differences.

Identifying barriers and strengths

The kinds of barriers residents may face could include:

- Physical barriers
- Communication barriers
- Financial barriers
- Systemic barriers

It is important to note that these barriers can be interdependent and mutually reinforced by one another. For example, a property not having disability access features can represent a physical barrier for a wheelchair user, whilst at the same time reflecting systemic barriers to disability inclusion.

When identifying barriers, we also aim to identify the resident's strengths and practical solutions that could help break barriers.

5.6 Record

We will record any relevant factors that we become aware of on our digital systems.

We will also record relevant information on reasonable adjustments and share this information as appropriate.

We will record whether there is a representative with delegated authority to speak to us on the residents' behalf, such as a care or support worker.

This will ensure our staff know in advance how to work best with residents to ensure equitable outcomes when delivering services.

There may be circumstances in which information is shared without the consent of the resident, for example where a safeguarding duty applies or in the case of a court order. Information will be shared where necessary, reasonable and proportionately. Consent is normally not required for collecting or using resident's personal data. Please see [Camden's Privacy Notice](#) for more information.

5.7 Respond

When responding to vulnerability, we aim to empower residents and work with them to remove barriers and build resilience by taking collaborative action, providing systemic support, and making reasonable adjustments. We also recognise and work in line with our duties under the Equality Act 2010 including:

- The Public Sector Equality Duty: our statutory duty to consider how the work we do will affect people with different protected characteristics
- Duty to make Reasonable Adjustments

Reasonable adjustments

We aim to put in place reasonable adjustments required to ensure equitable access to our services in accordance with our statutory responsibilities. Where we cannot provide an adjustment, we will work with the resident to try and identify alternative support to improve access.

There are three ways landlords can make adjustments:

- taking reasonable steps to avoid any disadvantages presented by a provision, criterion or practice
- taking steps to avoid a disadvantage presented by a physical feature
- providing extra aids or services (auxiliary aids and services).

Breaking barriers may involve making reasonable adjustments to our services. 'Reasonable' means that we can consider whether such an adjustment would be practical and/or affordable and the resources available.

Below is our general approach to empowering tenants to have equitable access by working in a strengths-based way to break down some of the most common barriers they may face:

Physical barriers

We aim to recognise each tenant's abilities and work with them to deliver services in a way that works for them. For example, by holding meetings in accessible locations.

Building relational connections with tenants allows us to respond promptly and empathetically to concerns about physical access.

Communication Barriers

We aim to focus on tenants' communication strengths, such as by understanding their communication needs and preferences. We work to remove communication barriers by adhering to communication needs and preferences and providing information in formats that empower tenants to make informed decisions. This could include use of easy-read and plain English summaries, communication passport, or translation and interpretation services.

Financial barriers

We recognise that financial challenges can limit opportunities for some tenants. Financial barriers can also have other effects, such as impacting a resident's availability to attend meetings due e.g. when working changing shift patterns.

We aim to build trust and understanding with tenants, supporting tenants to manage their finances. We focus on tenants' resilience and resourcefulness, helping them build financial stability while accessing and sustaining tenancies.

We also know that some residents may face financial barriers due to domestic or financial abuse. Our response to Domestic Violence and Abuse (DVA) is set out in our DVA policy.

Systemic barriers

Systemic barriers are obstacles that are embedded within the policies, practices, and structures of organisations, which limit access to opportunities and resources.

We know that systemic barriers can particularly impact residents experiencing multiple disadvantage, those who may draw support from multiple services, residents we seldom hear from, and residents who have experienced trauma, oppression or exclusion.

We aim to remove systemic barriers by building consideration of diversity, inclusion and holistic approaches into all new Housing and Repairs policies (see 'considering relevant factors in context'), and carrying out Equality Impact Assessments, which include a section on intersectionality, for all new policies.

We are also committed to delivering disability-aware, trauma-informed, and anti-racist services.

Website access

We provide information on the accessibility of our website in our [accessibility statement](#). Our [using our website page](#) also has information about making our website accessible including how to access free assistive technologies. If the assistive technologies don't help or aren't available, you can contact the service directly to ask for information in the format you need. For example, braille, Easy Read, or more accessible PDFs.

There is also information about services related to physical disability on this [Camden Care Choices page](#).

Considering relevant factors in policy and procedures

As of September 2024 onwards, every new policy and procedure produced by Housing and Property Management contains a section on '*Diversity, Inclusion and Holistic Services*'. This should describe how the policy ensures we tailor our approach to provide a holistic, person-centred service which supports residents to overcome access barriers, relationally meet needs, and offer early help when needed.

Some of the ways in which we adapt specific services in line with our person-centred framework are set out below. However, more detailed information about how we tailor services can be found in specific policies such as the [Housing and Domestic Violence and Abuse policy](#), [Housing Allocation Scheme](#), or [Anti-Social Behaviour policy](#), or on our website, Support for vulnerable or disabled council tenants.

Staff training

To ensure our staff are well equipped to recognise, record and respond to vulnerability, we deliver training to relevant staff covering topics such as dementia awareness, disability awareness, customer care, safeguarding, domestic violence

and abuse, communication skills, cultural competency, equality and diversity, and data skills.

We are aware of the harms of prejudice: we expect our staff to understand and respect social and cultural differences. We also embed anti-racist and trauma-informed practices in our services.

5.8 Ensuring Equitable Access

Collaboration is key to our systemic approach to ensuring equitable access.

Working together

To ensure the best outcomes for residents, officers work collaboratively with other agencies, organisations, and teams to address systemic blockages or offer holistic support. This may mean we:

- arrange a Team Around Me (TAM) meeting with the resident
- attend professionals meetings and multiagency case conferences
- make safeguarding, Adult Social Care or other support referrals
- offer social prescribing
- if the resident consents, engage with a resident's wider support network, such as voluntary and community sector organisations or advocacy services.

We recognise that some residents may have experienced trauma when engaging with services or agencies, and we aim to work in a person-centred, trauma-informed way.

Tenant participation

We know that the people living in our homes are best placed to make decisions about how services are delivered to best respond to their needs, and overcome barriers faced.

Through a relational and holistic participation approach, we aim to ensure everyone in Camden-managed homes is enabled to become an active citizen, their voices and needs are reflected in decision-making, and we champion community-led solutions for our estates and neighbourhoods. You can learn more about the way we involve residents in our services on [our website](#).

5.9 Safeguarding

We take our role as part of a family of services providing early help very seriously and recognise that safeguarding is everyone's responsibility.

This policy does not replace our policies, procedures, and processes around safeguarding adults and children or any other key documents such as safeguarding thresholds.

If we have a safeguarding concern, we will follow the appropriate safeguarding procedures.

5.10 Working with residents to understand and define vulnerability

When developing this policy, we worked with the Residents Panel to support us in understanding and defining vulnerability in a way that makes sense to and for residents.

We have embedded learning from the Panel within our definition of vulnerability and the development of this policy, and would also like to express our support for the following points highlighted by the Panel:

- Vulnerability is dynamic and can be temporary or context-based
- Our vulnerability definition and framework do not replace Care Act assessments
- Property issues can increase the vulnerability of everyone in the building
- Sometimes our services can't reduce vulnerability but should refer to other kinds of support
- Our policy needs to be flexible and accommodate the situation
- Vulnerability can be invisible to others
- We consider health inequalities
- Our policy also applies to our contractors

6. Diversity, inclusion, and holistic services

We consider vulnerability holistically, recognising the impacts of intersectionality, multiple disadvantage and disproportionality, as well as residents' strengths. Our staff maintain an awareness of and respect for social and cultural differences, supporting diversity and inclusion.

Although our focus is on seeing the whole person, we are also mindful that some groups of residents may disproportionately experience multiple disadvantage. For example, some residents who are neurodivergent or have invisible disabilities.

This policy is not intended to be rigid. With appropriate consultation, our framework can be applied flexibly in the spirit of this policy.

An Equality Impact Assessment has been carried out before adopting this policy.

7. Review

This policy will be reviewed in 3 years.

This document will be reviewed more frequently if required by changes in legislation, regulation, or the service.

8. Related documents

Anti-Social Behaviour Policy

Building Safety Act 2022

Camden's Privacy Notice

Domestic Violence and Abuse Policy

Equality Act 2010

Good Neighbourhood Management Policy

Housing Act 1985

Housing Allocations Scheme

Landlord and Tenant Act 1985

9. Information and version control

Title	Vulnerability Policy for Housing and Property Management	
Document number	2	
Author	Beatrice McGuire	
Responsible officer	Glendine Shepherd, Director of Housing Gavin Haynes, Director of Property Management	
Audience	Public	
Policy Area	Housing and repairs	
Consultation requirements	Internal	Not required
	External	Not required
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9.1. Version control

Version	Date	Summary of Changes	Actioned by (role)
1	31/07/2025	Policy development	Housing Policy and Change Lead