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# Vulnerability & Inclusive Services Policy

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March 2026

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Housing Services

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## 1 INTRODUCTION

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### 1.1 Purpose and scope

- (a) Stroud District Council (SDC) is committed to providing fair and inclusive services to all our tenants and residents, including those who may be considered vulnerable due to their personal, economic, or social circumstances. This policy outlines the steps and measures we will take to identify, support, and protect our vulnerable tenants and residents throughout their interactions with SDC as their landlord, in accordance with our obligations under the Equality Act 2010.
- (b) By implementing this Vulnerability & Inclusive Services Policy, we aim to foster an environment where all tenants and residents feel safe, valued, and supported throughout their interactions with SDC Housing Service.

### 1.2 Definition of Vulnerability

For this policy, a vulnerable tenant or resident is defined as:

*customers who have a **particular characteristic** and/or experience an **exceptional life event** and are currently **unable to act independently and/or are unable to cope with managing their tenancy without additional support**.*

This definition reflects SDC's understanding that 'vulnerability' can be a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic violence, or financial difficulty. The more common characteristics, events and factors SDC take into consideration when considering a customer's state of vulnerability are included at Appendix 1.

Some of these factors are a constant and some can be a life event, such as bereavement or domestic violence, that does not necessarily remain a permanent state. It is the interaction of these factors that will determine how vulnerable a person is at any point in time and how much additional assistance they may require to sustain their tenancy.

An individual's ability to act, engage or cope with everyday activities varies and so is an important factor in considering vulnerability. For example, many older or disabled people are very independent and active and often do not need any additional assistance to sustain their tenancy and remain independent.

## 2 IDENTIFICATION OF AND RECORDING VULNERABILITY

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Customer vulnerability may be identified by:

- Customers telling SDC they are vulnerable when they apply for a home or at any time by making a self-referral.
- Any colleague who has contact with a customer in-person, on the phone or through any other channel of communication.
- Contractors working on behalf of SDC.
- Via a referral from an external agency or organisation.
- From a family member or carer.

We will train our staff to identify potential signs of vulnerability, such as difficulty in communication, confusion, distress, or other observable cues. We will also encourage residents to self-identify as vulnerable if they are comfortable doing so. Common factors to be taken into consideration when considering a customer's state of vulnerability are set out at Appendix 1.

Staff will also receive training on the social factors that contribute to vulnerability and to develop an understanding of adverse childhood experiences.

For the purpose of recording tenant and resident vulnerabilities on our housing management systems, Stroud District Council Housing Service will use the following categories:

**Conditions/Illnesses:**

Registered blind, visual impairment, deaf or hard of hearing, physical disability or mobility issues, neurodivergent/autistic spectrum condition, mental health condition, learning difference, cancer, chronic respiratory disease, other disability

**Other Vulnerabilities:**

Drug addiction, alcohol addiction, mental health condition, recent bereavement (within last month), multiple complex needs, left hospital within the last month after a stay of more than 3 days.

### **3 TRAINING & AWARENESS**

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We will provide regular training to our staff to raise awareness about vulnerable residents and equip them with the skills and knowledge needed to recognise potential signs of vulnerability and interact with empathy, respect, and sensitivity. This training will cover topics such as recognising vulnerability, effective communication, trauma informed approaches and appropriate actions to take.

Contractors and others delivering services on behalf of SDC will also be offered access to online training to ensure that they can recognise and respond appropriately to customers who they believe are vulnerable.

### **4 COMMUNICATION AND ACCESSIBILITY**

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SDC will ask customers about any communication needs when they attend the tenancy sign-up and at other opportunities during the life of their tenancy (such as tenancy audits) and will record this.

We will ensure that our communication channels and materials are accessible to all customers, including those with different abilities or limitations. This includes providing options for alternative communication methods and accommodating specific needs, such as larger font sizes or sign language interpretation. Customers can also ask that correspondence is sent to someone who has 'delegated authority' to act on their behalf.

### **5 PRIVACY AND CONFIDENTIALITY**

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All interactions with vulnerable residents will be treated with the utmost confidentiality and respect for their privacy. Personal information will be handled in accordance with applicable law, our privacy policy (which can be found at: [Privacy Notice](#)) and the personal information processing statement set out in Section 9 of our tenancy agreement terms and conditions ([Secure Tenancy](#)).

## 6 SUPPORT AND ASSISTANCE

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### 6.1 Supporting Vulnerable Individuals

In cases where a vulnerable resident requires additional support, we will offer reasonable enabling measures to ensure their needs are met. This may include:

- Assisting customers in accessing additional services that they may need
- Recording any known third-party representatives who act as a 'delegated authority' or with power of attorney to act on the customer's behalf
- Considering any additional needs and where appropriate making reasonable adjustments to service delivery to ensure all customers receive an equitable level of service
- Making appropriate referrals to SDC's own advice and support services to provide enhanced support where appropriate to do so
- Referral to statutory agencies and other external partner support agencies where appropriate to ensure equal access to services and make reasonable adjustments for those with protected characteristics under the Equality Act 2010
- Reporting any safeguarding concerns for adults at risk or children (i.e. domestic abuse, physical, emotional or financial abuse) to the relevant local authority in accordance with the Safeguarding Policies
- Prioritising repairs according to their urgency and customers' particular needs or vulnerabilities where appropriate
- Supporting adaptations to a property to accommodate a disability in accordance with the Aids and Adaptations Policy
- Exercising discretion when making tenancy management decisions including granting a tenancy, taking rent arrears/possession action, effecting management transfers, approaching hoarding, applying recharges, and supporting victims of anti-social behaviour
- Supporting customers to sustain their tenancy by sign-posting and accessing support services with relevant partners
- Considering making provision for the requirements of customers with particular needs in new developments, such as appropriate size and space standards, access and safety, appropriate fixtures and fittings, and support requirements
- Providing practical support through the Tenant Support Fund to enable customers to continue to maintain their tenancies
- Offering translation or interpreting services to those who English is not their first language
- Recording on the customer record any known vulnerability, any particular communication or access needs, and whether there is anyone with delegated authority to speak to us on the residents' behalf, such as a care or support worker. This will ensure our staff will have advance knowledge of any additional factors to consider when delivering services.

### 6.2 Making Reasonable Adjustments

The Council recognises it's legal obligation to make reasonable adjustments to our services and facilities to remove barriers to customers accessing services. This means changing or adapting services to meet the individual needs of tenants. Examples are as follows:

- Pre-Action Protocol for Possession Claims by Social Landlords (2015). This protocol sets out the requirements that a Registered Provider of Social Housing must have either considered or complied with in relation to possession proceedings.

In particular where possession action is being considered, SDC will ensure that pre-action consideration is given to:

- Whether the customer's behaviour, actions or lack of action is related to their disability
- 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 SDC's action

The pre-action protocol requires us to consider the vulnerability of the tenant prior to the commencement of proceedings. If we are aware the tenant has difficulty reading or understanding information, we will take reasonable steps to ensure that we have communicated appropriately and that the tenant understands any information we have given.

- Providing an aids and adaptations service to support tenants to live independently in their own home as long as possible.
- Providing pictorial information for people with a learning disability, such as a pictorial tenancy agreement.
- Understanding any health issues that may require repairs to be prioritised more quickly.
- Involving customers when developing new process and policies.
- Ensuring customers can nominate a third party to help manage their tenancy.
- Providing documents or correspondence in larger print or in a specific colour contrast to aid those with visual impairments or dyslexia.
- Allowing extra time for responses or providing alternative means of communication such as email or telephone for those with communication difficulties.
- Providing sign language interpretation or other communication support.
- Where reasonable, ensuring physical access to buildings or facilities, including ramps, lifts, and accessible toilets.

Adjustments only have to be made if it's reasonable to do so. What is a reasonable adjustment will be factored in with considerations including:

- Disability;
- How practicable the changes are;
- If the change would overcome the disadvantage customers and other disabled people experience;
- How much money and resources are available;
- The cost of making the changes;
- If any changes have already been made

The Council will try and be proactive, without waiting for a specific request. This is particularly important with hidden disabilities when an individual may feel unable to volunteer their need for a reasonable adjustment until asked.

## **7 LEGAL AND REGULATORY COMPLIANCE**

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This policy is developed and implemented in accordance with all applicable laws and regulatory standards pertaining to protection of vulnerable individuals.

### **7.1 Consumer Standards**

The Regulator of Social Housing's Transparency, Influence and Accountability Standard requires registered providers to "treat tenants and prospective tenants with fairness and respect" and "understand the diverse needs of tenants, including those arising from protected characteristics, language barriers and additional support needs", with a specific expectation that providers will "demonstrate how they respond to tenants' needs in the way they provide services and communicate with tenants".

### **7.2 Complaints Handling Code**

The Housing Ombudsman Complaints Handling Code 2020 states that landlords should "comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords shall have a reasonable adjustments policy in place to address this". This Policy fulfils that requirement of the code.

### **7.3 Public Sector Equality Duty**

SDC 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". See section 8 below.

## **8 EQUALITY AND DIVERSITY**

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### **8.1 Protected Characteristics**

Under the Equality Act 2010, SDC may be considered as exercising a public function in the provision of its services and so has to "in the exercise of its functions, 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.

While SDC does not necessarily define all people with a protected characteristic as 'vulnerable' for the purposes of this Policy, SDC 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.

### **8.2 Mental Capacity**

Officers may at any time consider a resident lacks the ability to make specific decisions due to illness, disability, brain injury, mental health issues, or effects of drugs/alcohol, and may require support or formal measures to protect them and make decisions in their best interests. Where a formal assessment of mental capacity is required, officers will refer to a professional responsible for the resident's care such as a healthcare professional, social care staff or legal advocate.

In line with the Mental Capacity Act 2005, SDC will liaise with those who have legal authority to act on behalf of its residents 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

This Policy should be considered in conjunction with the Council's [Equality, Diversity, Inclusion, Equity, and Belonging](#) Policy.

An equality impact assessment has been undertaken when developing the Policy with particular consideration applied to the areas described above. The completed equality impact assessment can be provided upon request.

## **9 ASSOCIATED POLICIES AND PROCEDURES**

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This policy should be read and applied in conjunction with the following:

- Tenancy Agreements (terms and Conditions of tenancy)
- Resident Engagement & Communications Strategy
- Tenancy and Estate Management Policy
- Equality Diversity Inclusion and Belonging Policy and Action Plan
- Safeguarding Policy
- GSAB Multi-Agency Adult Risk Management Policy
- Tenant Support Fund Policy and Procedure

## **10 MONITORING AND REVIEW**

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We are committed to continuously improving our policies and practices related to vulnerable residents. We will regularly review and update this policy to ensure it remains effective and aligned with best practices.

This Policy will be monitored by the Head of Tenant Relationships and reviewed every 24 months by the Tenant Oversight Panel. All future Policy updates are to be approved as directed by the Housing Committee.

## Appendix 1 – Factors in Defining Vulnerability

The categories below do not list every possible factor as the whole spectrum of who could be regarded as vulnerable at any point in time is wide, but these are the more common factors to take into consideration when considering a customer's state of vulnerability.

**Factor 1 Underlying characteristic** (people in these groups may not always require additional support just because of this characteristic)

- Older people (particularly those 75 years or older)
- 16 – 21-year-olds
- Very young children and babies (particularly those 2 years old or under)
- Disabled people
- Care leavers
- Lone parents under 21 years old
- Refugees or asylum seekers
- Carers
- Families with disabled children
- Ex-service personnel
- Those living with a terminal illness

**Factor 2 Ability to act, engage and cope** – (people may lack ability because of having one or more of these factors)

- Learning disability
- Mental illness
- Autism Spectrum Disorder
- Permanently impaired mobility or frailness
- Chronic, debilitating health conditions
- Addiction/serious substance or alcohol abuse
- Low level of literacy
- Low or no English language skills
- Age related conditions that impact on independent living

**Factor 3 Exceptional life event** (people may not have factors 1 and 2 but may have recently experienced an exceptional or traumatic event and so may be vulnerable at this point in time)

- Recent history of street homelessness
- Recently moved from supported accommodation to independent living
- Bereavement following the death of a partner, child, or other close relationship
- Having recently left care as a young person
- Sexual or racist abuse or serious harassment or other hate crime
- Recent experience of domestic violence
- Living in or recently left a refuge or homeless persons' hostel
- Recently discharged from hospital or other institutional care
- Periods of sustained physical or mental illness at home
- Multiple debts and unable to meet basic needs e.g. fuel or food poverty
- Pregnant women
- Recently given birth, still born or miscarried
- Recently released from prison after a custodial sentence

- Families with children excluded from school
- Ex-service personnel returning from area of conflict