



THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

Royal Borough of Kensington and Chelsea (RBKC) Housing Management

VULNERABILITY POLICY

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Author	Service Improvement Team
Responsible Officer	Bernard Lean, Grazyna Wilk, Dan Mallinder
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1 Introduction

- 1.1 The Royal Borough of Kensington and Chelsea (RBKC) is committed to ensuring that vulnerable residents experience fair and equitable outcomes when accessing our housing services. We will build services that adapt to the needs of vulnerable residents and that help embed a person-centred approach across all services; not just in our face-to-face interactions with our residents, but in areas such as service design and communication.
- 1.2 This policy sets out the Council's approach to supporting vulnerable tenants and leaseholders when accessing our housing management services, to sustain their tenancies/lease agreements.
- 1.3 This policy does not aim to explain directly how we will approach every circumstance of a resident requiring an adjustment to access our services. It focuses on our overall commitment to ensuring that vulnerable residents are given equal opportunities to accessing RBKC's services.

2 Scope

- 2.1 As per the Housing Ombudsman's proposed approach to vulnerabilities, the scope of this document is intentionally inclusive, reflecting the diversity of our community and recognising that vulnerability can be temporary, situational, or long term. The Council is mindful that not all residents wish to be identified or described as "vulnerable" and we will therefore approach each case with discretion, respect, and sensitivity to individual preferences.
- 2.2 This policy is relevant to individuals in RBKC housing who are collectively referred to as 'residents'. The policy establishes RBKC's commitment to identifying, understanding and responding appropriately to residents who may require additional support to sustain their housing and live independently.
- 2.3 The Council will aim to consider the individual person's needs when supporting vulnerable residents, but the scope of this differs by tenure and individual. For tenants, the Council will aim to make proactive interventions, adapt tenancy management and influence living conditions. For leaseholders the support focuses predominantly on service delivery and communication, within the legal and contractual limits of the leaseholder relationship.

3 Related Documents

- 3.1 This policy is to be read in conjunction with the following policies and documents (<https://www.rbkc.gov.uk/housing/consultations-publications-and-policy/housing-policies-and-strategies>):
 - RBKC Housing Management Safeguarding Policy
 - RBKC Housing and Social Investment Domestic Abuse Policy

- RBKC HM Antisocial Behaviour Policy
- RBKC HM Hoarding Policy
- RBKC Equality and Diversity Policy

3.2 RBKC Housing Management aims to consider vulnerabilities and additional needs in the delivery of all of its services, so the above list is not exhaustive.

4 Legal Context

This policy complies with the following legislation:

- Equality Act 2010
- Data Protection Act 2018
- Housing Act 1985
- The Mental Capacity Act 2005
- Care Act 2014
- Social Housing Regulation Act 2023.

5 Definition

5.1 Below is the Housing Ombudsman's definition of vulnerability in a housing context:

'A dynamic state which arises from a combination of a resident's personal circumstances, characteristics and their housing complaint. Vulnerability may be exacerbated when a social landlord or the Housing Ombudsman Service does not act with appropriate levels of care when dealing with a resident's complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced...'

5.2 Based on the definition above, for the purpose of this policy, our definition for vulnerability is as follows:

'A dynamic state which arises from a combination of a resident's personal circumstances and characteristics, resulting in a reduced ability to advocate for oneself or an increased likelihood of experiencing harm. Vulnerability can be exacerbated when services fail to exercise appropriate care but may be mitigated through the implementation of effective and reasonable adjustment.'

5.3 Alongside this, our approach to vulnerabilities in a housing context will be guided by 'person-centred' support. This means we will focus on the individual i.e. What does that person need, in their situation, right now? Instead of having a system-focused model where residents' situations are rigidly categorised, then directly dictating the support provided. This will help ensure services are shaped around the needs and experiences of residents, instead of applying a standardised, one-size-fits-all response.

5.4 A reasonable adjustment is a legal term for how we change the way we deliver a service, communicate, or carry out our work that helps remove barriers

experienced by a disabled person. We will work within this definition in deciding what is reasonable, considering factors such as effectiveness, practicality, cost, and the resources available. In addition to this, we may agree other flexible adjustments to respond to a resident's wider circumstances or vulnerability, even where there is no legal duty to do so.

6 Recognising Vulnerabilities

- 6.1 RBKC Housing Management will look to identify vulnerabilities in resident's individual circumstances and where these may create barriers to accessing our services. We will work with residents to agree practical and proportionate support, to improve outcomes; involving family members or wider support networks where appropriate.
- 6.2 We recognise that anyone may experience vulnerability. This approach reduces reliance on self-identification and supports early recognition of need. It also promotes inclusive service delivery so that appropriate support can be offered sensitively and effectively. This will help us prevent individuals slipping through the cracks and ensure all residents get the support they need.
- 6.3 We know that recognising vulnerability requires an understanding that people's experiences are often shaped by overlapping factors. Health, income, language and culture are some of the aspects that increase risk or barriers to accessing support. This is known as intersectionality. We will take an intersectional approach to recognising vulnerabilities, which ensures we build a fuller picture of individuals' needs.
- 6.4 We have several different ways to help us identify vulnerabilities in our residents, some of which are:
 - Self-reporting by residents, whether proactively or during contact,
 - Referrals and information sharing from partner agencies and services,
 - Reviewing case records, notes and historical interactions,
 - Input from multi-agency or professional meetings,
 - Direct conversations at key touchpoints, including assessments and home visits,
 - Observation of indicators, such as repeated access issues to properties, clutter, or frequent repair reports.
- 6.5 The categories below are intended to help identify factors that may affect a resident's ability to access services, manage their tenancy or generally engage with the Council. The presence of any factor does not automatically mean a resident will be considered vulnerable, nor does it determine the support that will be provided. Each case will be assessed individually using available evidence, professional judgement and the actual impact of the circumstances on the resident. This helps ensure decisions are consistent and based on need rather than preference alone.

Personal Circumstances and Individual Factors		
Health and disability	Mental wellbeing	Communication and accessibility
- Physical disabilities or mobility impairments, - Sensory impairments e.g sight or hearing loss, - Learning disabilities, - Neurodivergence e.g autism and ADHD, - Long-term health conditions or serious illness, - Temporary illness, injury, or recovery from surgery, - Cognitive impairment, dementia, or memory-related conditions, - Frailty associated with age, - Pregnancy or parents with very young children,	- Mental health conditions, - Experience of trauma or adverse life events, - Bereavement or significant life events, - Substance misuse or dependency.	- Language barriers, - Literacy difficulties, - Digital exclusion or limited access to technology

6.6 Below are vulnerabilities that can stem from an individual's social, environmental and situational circumstances, but are not limited to:

Social, Environmental and Situational Factors		
Social and Family Circumstances	Financial and Housing Circumstances	Safety and Safeguarding
- Social isolation or lack of support networks, - Residents with caring responsibilities - Care experienced young people or care leavers, - Refugee, asylum seeker, or recent resettlement circumstances, - Residents recently discharged from hospital, prison, care settings, or other institutions,	- Financial hardship, debt, or fuel poverty - Unemployment or sudden loss of income, - Risk of homelessness or housing instability	- Domestic abuse, - Hoarding behaviours, - Self-neglect, - Safeguarding concerns, - Victims of harassment, hate crime, antisocial behaviour or exploitation

- 6.7 The examples listed are not exhaustive and should not be viewed as a ranking or definitive classification of vulnerability. Different circumstances can affect people in different ways, and some may require a greater response than others depending on their severity, duration and impact. Any support or adjustments offered will be reasonable, proportionate and balanced against the Council's responsibilities, legal duties and the rights and wellbeing of other residents. Decisions about vulnerability and appropriate support will be made by the Council based on all relevant information available at the time.

7 Recording Vulnerabilities

- 7.1 Vulnerability is not a label or a judgement; it is information that helps staff understand how best to communicate with residents, how to prioritise risks, and how to make reasonable adjustments where required. Recording this information ensures that:
- Residents do not have to repeat their situation every time they contact the Council,
 - Staff can respond appropriately and consistently, tailoring our approach to individual circumstances,
 - Any reasonable adjustments are clearly flagged and acted upon,
 - We can prioritise issues that may affect a resident's health, safety, or ability to manage their home.
- 7.2 RBKC will record information about the vulnerabilities of residents and members of their households on our housing management systems. This information will only be accessible to staff who need it in order to deliver housing services safely, fairly and effectively. We will explain why we are recording this information and how it will be used.
- 7.3 RBKC will maintain accurate and factual written records. These will be updated regularly through tenant censuses, routine contact and any changes reported by residents. We will also record details of any authorised representatives acting on a resident's behalf, to ensure communication and decision making are properly supported. This will be an ongoing, proactive process with residents.
- 7.4 We will regularly review and update our understanding of resident's circumstances to ensure that information about vulnerability remains accurate and reflects any changes over time. This will enable us to respond appropriately as situations evolve and ensure that support and reasonable adjustments continue to meet resident's current needs.
- 7.5 This approach ensures our services remain responsive, inclusive, and sensitive to the individual needs of residents experiencing temporary or long-term vulnerabilities. It also ensures joined up working with other departments across the Council and relevant Voluntary and Community Sector organisations (VCS) to provide holistic support.

- 7.6 Residents may ask the Council to update or review their vulnerability record at any time, particularly if their circumstances change.
- 7.7 There may be circumstances where information is shared without the resident's consent, for example where a safeguarding duty applies or where required by a court order. In such cases, information will only be shared where necessary, reasonable, and proportionate. Consent is not normally required for the Council to collect or use personal data for the purpose of delivering housing services.
- 7.8 Vulnerability information will be reviewed regularly and retained only for as long as necessary to deliver housing services. Further information about how we use, store, and protect personal data is available in the RBKC Corporate Privacy Notice, which can be accessed at [Privacy notice | Royal Borough of Kensington and Chelsea](#).

8 Responding to Vulnerabilities

- 8.1 When responding to vulnerability, RBKC will work with residents to remove barriers, build resilience, and access appropriate support through collaborative working and reasonable adjustments.
- 8.2 We will act in accordance with our duties under the Equality Act 2010, including:
- The Public Sector Equality Duty - our statutory duty to consider how our decisions and services affect people with different protected characteristics.
 - The duty to make reasonable adjustments for disabled people.
- 8.3 We will make reasonable adjustments where appropriate to help residents access our services fairly and equitably. Where we cannot provide a requested adjustment, we will work with the resident to identify alternative ways of improving access and support.
- 8.4 We will work with residents to understand and record their communication needs and preferences. Wherever possible, we will tailor our approach accordingly. Upon request, this may include providing information in alternative formats, using interpretation or translation services, involving advocates or support networks where appropriate, and adapting how and when we communicate.
- 8.5 We will try to tailor all our services to each resident's needs, preferences and circumstances, to give residents opportunities to obtain the best outcomes.

9 Managing Vulnerabilities Around Repairs and Major Works

- 9.1 RBKC recognises that repairs and major works can create additional stress or risk for residents who are experiencing vulnerabilities. We will take all reasonable steps to ensure that repair and improvement activities are delivered safely, sensitively, and in a way that meets the needs of vulnerable households.
- 9.2 Where a vulnerability is known or identified, staff will consider how the repair or major works may affect the resident and will make appropriate adjustments.
- 9.3 This may include adapting appointment times, providing additional communication or support, or prioritising works where a resident's health or safety may be affected.
- 9.4 Before major works begin, RBKC will assess whether any resident in the affected property or block has a recorded vulnerability. Where relevant, Resident Liaison Officer (RLO) will contact residents to understand any specific needs, risks, or support requirements. This may include mobility issues, health conditions, communication needs, safeguarding concerns, or other circumstances that may affect how works should be planned or delivered.
- 9.5 RLOs will work with residents throughout the works providing support and liaising between different teams to make the resident experience as comfortable as possible.
- 9.6 Contractors and staff involved in repairs or major works will be informed of relevant vulnerability information on a strictly need-to-know basis. Contractors will be required to familiarise themselves with RBKC policies and procedures (Vulnerability Policy, Safeguarding Policy and Procedure. This ensures they can take appropriate precautions, communicate effectively, and work safely and respectfully within residents' homes.
- 9.7 If a resident's vulnerability means that repairs or major works could place them at risk or severe discomfort, RBKC will work with the resident to agree a safe approach tailored to the needs of the individual. This may include respite, temporary adjustments, additional visits, being decanted to another property, and/or liaison with support services or authorised representatives.
- 9.8 Residents are encouraged to tell us if repairs or major works may be difficult for them to manage due to their circumstances. We will update vulnerability records accordingly and ensure this information informs how services are delivered.
- 9.9 Our aim is to ensure that repairs and major works are carried out in a way that is safe, inclusive, and responsive to the needs of residents experiencing temporary or long-term vulnerabilities.

10 Safeguarding

- 10.1 We take reports of abuse and neglect very seriously and will listen to your concerns and provide a prompt response.
- 10.2 If you are concerned that an adult may be at risk of abuse, harm or neglect from either themselves, an individual or an organisation, please contact us on:
- Telephone: Safeguarding helpline 020 7361 3013 (office hours) / 020 7361 3013 (out-of-hours)
 - Email: socialservices@rbkc.gov.uk
- 10.3 If you or someone you know is experiencing domestic violence call 24-hour free help line for advice:
- Telephone: 0808 2000 247
- 10.4 For more information, please see Housing Management Safeguarding Policy or go to <https://www.rbkc.gov.uk/health-and-social-care/adult-social-care/safeguarding-adults> and <https://www.rbkc.gov.uk/housing/personal-and-community-safety/domestic-abuse-and-violence-against-women-and-girls>
- 10.5 If you're worried about a child, aged under 18, please visit our [safeguarding children website](#).
- 10.6 If you have an emergency and need immediate help, please call the Police, Ambulance Service or London Fire Brigade on 999. If it isn't an emergency but you need help fast, call the Police on 101.

11 Equalities Statement

The Council is committed to promoting fair and equal access to services and equal opportunities in employment, the procurement of goods and as a community leader. The Council's policies, procedures and day to day practices have been established to promote an environment which is free from unlawful and unfair discrimination while valuing the diversity of all people.

Discrimination on the grounds of race, nationality, ethnic origin, religion or belief, gender, marital status, sexuality, disability and age is not acceptable: RBKC aims to take action to ensure no person using the Council's premises or services receives less favourable treatment or is disadvantaged by requirements or conditions that cannot be justified. RBKC will tackle inequality, treat all people with dignity and respect and continue to work to improve services for all service users.

The legal framework for the Council's approach is provided by the Equality Act 2010 and specifically by the Public Sector Equality Duty, under which a public authority must work consciously to eliminate discrimination, harassment, victimisation and to advance equality of opportunity and foster good relations between people with differing characteristics.

Further detail on the Duty, and the Council's approach to fulfilling its requirements, can be found at www.rbkc.gov.uk.

12 GDPR & Data Protection

As a directorate of RBKC, Housing Management shares the commitment to ensure that all data is:

- processed lawfully, fairly and in a transparent manner;
- collected for a specific and legitimate purpose and not used for anything other than this stated purpose, or as provided for in our privacy and fair processing notices;
- relevant and limited to whatever the requirements are for which the data is processed;
- accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay;
- stored for as long as required, as specified within RBKC's Records Retention policy;
- secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and accidental loss, destruction or damage.

For further information about the Council's commitment to the General Data Protection Regulations (GDPR), visit the Council's website at www.rbkc.gov.uk.

13 Compliance, Monitoring & Review

13.1 This policy will be reviewed every five years or when legislative or regulatory changes take place that could affect it. The next review will take place by:

September 2031