

Vulnerable Customer Policy



Lead Director: Assistant Director Housing and Communities

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Committee Review: Customer Committee

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1. Introduction and Aim

- 1.1 Cobalt Housing is committed to supporting customers with vulnerabilities. This ensures that those customers are provided with the necessary support so they can access the services they require to sustain their tenancies and live independently.
- 1.2 Cobalt recognise that some customers will require additional support in meeting their obligations and may also require flexibility in timelines or other aspects of tenancy management to assist in complying with their terms and conditions of tenancy.
- 1.3 Cobalt also recognise that some customers will require reasonable adjustments to access services, or to receive their repairs and safety work more expediently than others.
- 1.4 Cobalt will ensure that the correct services are being delivered and where appropriate any necessary referrals will be undertaken by Cobalt employees to both statutory and voluntary services, for example local mental health teams, women's refuge charities and other appropriate organisations.

2. Policy Statement

- 2.1 This Policy sets out Cobalt's commitment to assist our customers who present with vulnerabilities to access our services, and to ensure they receive the assistance they need to sustain their tenancy.
- 2.2 The Policy intends to:
 - acknowledge vulnerabilities and ensure Cobalt promotes independence
 - ensure employees are equipped appropriately to support customers who present with vulnerabilities
 - ensure Cobalt triages levels of vulnerability to ensure safeguarding in relation to the Care Act six principles (empowerment, protection, proportionate, prevention, partnership, accountability)
 - ensure customers presenting with vulnerabilities are supported where appropriate, but that the support does not override the responsibilities of customers to adhere to their tenancy agreements
 - ensure when vulnerabilities are reported and recorded, we have considered vulnerability / circumstance in deciding whether to expedite repairs.

3. Policy Principles

- 3.1 Cobalt provides additional support and responds flexibly to customers who are facing circumstances that can make them more vulnerable and potentially impact on the sustainability of their tenancy. This Policy sets out the steps we will take to achieve this. It focuses on customers who are vulnerable but have the capacity to make their own decisions. Where a customer has been assessed as lacking (refer to item 3.11 in this Policy), or believed to lack, the capacity to make decisions we will work with their appointed representative.
- 3.2 As a responsible social landlord, our overall objective is to ensure that our customers receive adjustments to our services and the assistance they require to sustain their tenancy where required.
- 3.3 To achieve this, we aim to:
 - gather and use information to identify if a customer or household member is vulnerable
 - record any vulnerabilities on the customer's contact record and keep this up to date
 - take account of known vulnerability factors in the provision of services and in decisions around tenancy management, complaints, and enforcement
 - assist vulnerable customers in accessing additional services that they may need

- record any known representatives who act as a ‘delegated authority’ or with power of attorney to act on the customer’s behalf
- consider any additional needs due to the vulnerability and where appropriate vary our service delivery to ensure vulnerable customers still receive the same level of service
- make appropriate referrals to Cobalt’s Tenancy Wellbeing Service to provide enhanced support where appropriate
- refer to statutory agencies and other external partner support agencies where appropriate
- make safeguarding referrals whenever needed.

Transparency, Influence and Accountability Standard

- 3.4 By maintaining and implementing this Policy, Cobalt is upholding the regulatory Transparency, Influence and Accountability Standard by adhering to the following:
- treating all customers with fairness and respect
 - investigating any complaints of alleged discrimination against customers
 - carrying out work to understand the barriers different customers might face in accessing services and working to remove those barriers
 - collecting robust information about customers to deliver fair and reasonable outcomes in relation to housing services
 - working with customers to decide the most effective approach to gathering, storing, and keeping information up to date
 - making customers aware of the ways in which services are tailored to meet their needs such as communication in various formats and languages upon request
 - have a process in place for customers to nominate a representative to act on their behalf for housing related matters.

Defining Vulnerability

- 3.5 Cobalt defines ‘vulnerable’ in relation to the provision of its services 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 manage their tenancy without additional support.
- 3.6 The definition reflects Cobalt’s understanding that ‘vulnerability’ can be a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic violence, poverty etc. The more common characteristics, events, and factors we take into consideration when considering a customer’s state of vulnerability are included at **Appendix 1**.
- 3.7 Some of these factors are 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.
- 3.8 An individual’s ability to act, engage or manage everyday activities varies and so is a crucial 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.

Protected Characteristics

- 3.9 Under the Equality Act 2010, Cobalt may be considered as exercising a public function in the provision of its services and so must:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act
- 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.

3.10 Cobalt review decision making to ensure there is no discrimination relation to protected characteristics informing those decisions.

Customers Lacking Capacity

3.11 In line with the Mental Capacity Act 2005, we will liaise with those who have legal authority to act on behalf of Cobalt’s residents who lack capacity. That may be a representative who has a:

- Lasting Power of Attorney (LPA)
- Deputyship Order from the Court of Protection
- Litigation friend appointed in Court proceedings if the customer 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.

Compliance and Monitoring

3.12 A report of recorded vulnerabilities is reviewed regularly on our Housing Management System. We recognise the need to consistently review, update and renew vulnerability information held to ensure it is up to date. To assist with this, our Big Listen project identified vulnerabilities with our customers, so we are better placed to tailor our services. Cobalt will also take every opportunity when in contact with customers to identify vulnerabilities. We have included customer data collection in our processes including at sign up and tenancy meetings with customers.

3.13 Customers who receive support from our Tenancy Wellbeing Team will have cases recorded on our Housing Management System. Cases are reviewed regularly by the team to assess the level of intervention required and close cases / re-open if appropriate. Updates on our approach, risks and outcomes associated with vulnerable customers will be provided to the Customer Committee as part of the Neighbourhoods and Partnerships Performance Report.

4. Risk Management

4.1 The key risk associated with non-delivery of this Policy is:

Risk Register Ref:	Risk Description:
ST 19 – Customer Expectations and Service	Service delivery does not meet customers’ needs, expectations or service standards.
Risk Consequences:	Management and Mitigation:
<ul style="list-style-type: none"> • Failure to identify and support vulnerable customers may lead to customers experiencing harm, tenancy breakdown or unmet support needs. • Failure to not meet our obligations under safeguarding, equality or 	<ul style="list-style-type: none"> • Mandatory employee training on identifying and recording vulnerabilities, and refresher training. • Routine review of vulnerability flags and support plans. • Strong links with statutory and voluntary support agencies. • Regular compliance checks and case audits. • Clear escalation routes for safeguarding and complex cases.

<p>consumer standards, resulting in regulatory action, legal challenge or Ombudsman findings.</p> <ul style="list-style-type: none"> • Vulnerable customers may receive inconsistent levels of support across teams, which could lead to unfair treatment, increased complaints and reputational damage. • Vulnerability may not be considered when scheduling repairs or safety checks, which could lead to customers with higher needs being left in unsafe or unsuitable living conditions. • Employees may lack the skills or confidence to identify and manage vulnerability effectively which could lead to poor decisions or missed interventions escalating risks for customers and employees. • Vulnerabilities may not be recorded accurately or shared with relevant teams, which could lead to customers receiving fragmented support and important risks may be overlooked. 	<ul style="list-style-type: none"> • Standardised processes for assessing vulnerability and support needs. • Clear guidance for employees on reasonable adjustments and flexible approaches. • Regular cross-team case reviews • Integration of vulnerability flags into repairs and compliance systems. • Clear criteria for expediting repairs based on vulnerability. • Routine monitoring of repair times for vulnerable customers. • Reasonable adjustments made to help with access to appropriate services. • Programme of tenancy visits in place to ensure all customers are contacted. • Access and signposting to statutory agencies and external partners, and escalation points, for additional support. • Annual self-assessment against the RSH regulatory standards. • Regular reflective practice or case learning sessions. • Regular data quality checks. • Information sharing protocols with internal teams and external partners.
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5. Regulatory and Legislative Requirements

5.1 This is a general overview and should not be used as a substitute for seeking legal advice in specific cases.

5.2 The Policy helps fulfil Cobalt’s obligations under the following legislation, in no order of importance:

- Anti-Social Behaviour, Crime and Policing Act 2014
- Protection from Harassment Act 1997
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Human Rights Act 1998
- Housing Act 1985, 1988, 1996 and 2004
- Homelessness Act 2002
- Regulator of Social Housing Consumer Standards 2024

6. Links to Other Key Documents

- ASB Policy
- Domestic Abuse Policy
- Repairs Policy
- Health and Safety Policy Statement
- Complaints and Discretionary Compensation Policy
- Safeguarding Policy
- Housing Ombudsman’s Spotlight Report on Attitudes, Rights and Respect
- Housing Ombudsman’s Report July 2024 - Taking the Key Lessons from Severe Maladministration

- Housing Regulator Consumer Standards and Code of Practice 2024.

7. Governance of this Policy

Equality Diversity and Inclusion (EDI)	An Equality Impact Assessment (EQIA) was completed on 19th July 2025 involving members of the Partnerships Team. In all elements of this Policy, we will consider individual customer circumstances and we will consider if reasonable adjustments are appropriate on a case-by-case basis. A list of vulnerabilities is provided as part of the Policy. The Policy outlines the protected characteristics and the need for them to be considered in identifying vulnerabilities.
Financial and Links to VfM	Dealing effectively with vulnerable customers and putting in place the relevant support ensures Cobalt provides a better service for those most in need. Intervention reduces the risk of further crisis for our customers and ensures tenancies are sustained.
Privacy and Data Protection	Data will be stored on our housing management system and will be subject to normal protocols in managing data.
Health and Safety	The Policy has no major health and safety implications for Cobalt employees and will support the health of customers.
Development and Consultation	This Policy has been reviewed in conjunction with key teams involved in the implementation of the Policy including the Tenancy Wellbeing Team June and July 2024, Tenants Consultative Panel 24th July 2024, Yvonne Davies, Board Member July 2024, Lucy Bridge, employee June 2024, Cobalt Governance and Assurance and Neighbourhood Teams July and August 2024 and Cobalt Homes and Neighbourhoods Committee 7th August 2024.

Appendix 1 - List of Vulnerabilities

The categories below do not list every 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.

1. **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 to 21-year-olds
 - Disabled people
 - Care leavers
 - Lone parents under 21 years old
 - Refugees or asylum seeker
 - Carers
 - Families with disabled children
 - Ex service personnel
 - Those living with a terminal illness

2. **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

3. **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 now):
 - 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 person's 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

