



Vulnerability Policy

Issue control	
Policy:	Vulnerability Policy
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Policy Owner:	Director of Customer
Policy Author:	Operations Manager (Community Safety and Safeguarding)
Approved by:	Executive Team
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Policy grade:	2 (Executive Team)
Equality Assessment completed:	Yes
Data Protection Impact Assessment required:	Yes
This document is uncontrolled when printed	

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For support and advice regarding the policy, please contact the Policy Owner. For queries on the policy register, please contact the Governance Team.

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Policy Statement

- This document covers our policy on vulnerability and highlights the ways in which we will identify customers that we might describe as being vulnerable. It also describes how we will work with these customers to ensure they are provided with the support they need to sustain their tenancy.
- As part of the Group's vision to build strong communities, we will strive to ensure that every one of our customers can access our services and sustain their tenancy.
- We may consider someone to be vulnerable where they are 'An individual or household who are in need of additional care or support to enable them to live safely and sustain their tenancy'. This does not mean that everyone who meets the definition is vulnerable, but we will use it as a guideline when assessing the needs of our customers.
- We want to empower customers to feel in control of their everyday life and will achieve this by effective profiling, early intervention and appropriate support provision, working with partners whenever we need to.
- We will seek to proactively identify people who may require assistance at the earliest opportunity and aim to ensure that we secure the most appropriate, tailored solution for that customer and their household. We will therefore alter our service delivery to vulnerable customers to ensure they receive excellent service and are not placed in a dangerous or disadvantaged position. However, such changes will be reasonable adjustments.
- To enable our customers to remain in their homes and live as independently as possible, we are committed to ensuring that every opportunity has been provided to support them in their tenancies. This Policy will therefore be used to amend or inform other policies when it is apparent that there is a vulnerability which needs to be considered.
- Where necessary, we will take enforcement action against tenancy breaches, however we will evidence that we have offered support repeatedly, offered to make reasonable adjustments and ensure any action is proportionate.
- Every customer is treated as an individual when assessing vulnerability and determining the level of support required.
- We will draw upon the expertise of our staff and partner agencies to formulate the most appropriate solution in every scenario.
- We want to empower customers to feel in control of their everyday life and will achieve this by effective profiling, early intervention and appropriate support provision.
- Gentoo will remain committed to the principles of diversity and inclusion throughout the organisation and aim to:
 - Meet the needs and choice of people from all backgrounds

- Ensure that our services are relevant, responsive and sensitive to the needs of our existing and future customers
- Ensure that all sections of the community in which we work have equal access to our services
- Our vulnerability policy will ensure that our customers are treated as individuals and with fairness and respect.

Equity, Diversity, Inclusion and Belonging

- We are committed to the principles of equity, diversity, inclusion and belonging throughout the organisation and aim to:
 - Treat everyone equally, fairly, and with respect.
 - Provide fair and equitable outcomes for colleagues and customers.
 - Welcome and value difference and not tolerate discrimination, harassment or victimisation of any individual or groups.
 - Challenge the behaviour of those who do not uphold our values and go against our principles.
 - Oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training, or other developmental opportunities.
- We are committed to the principle of diversity and inclusion for all colleagues and customers, regardless of sex, race, religion or belief, age, marriage and civil partnership, pregnancy and maternity, sexual orientation, gender reassignment, or disability.
- This policy and the associated procedures (if applicable) will ensure that customers and colleagues are treated as individuals with fairness and respect. An Equality Assessment has been completed on this policy.

Scope, Escalation and Monitoring

Scope

- The scope of this policy covers Gentoo Group.
- This policy applies to:
 - General needs rented properties
 - Supported housing

- Sheltered housing
- Leasehold/Shared Ownership
- Temporary accommodation
- Stock managed by Gentoo on behalf of a third party

Escalation

- Where the Board or a Committee has concerns about significant issues in any area of this policy, they must escalate these concerns to the Executive Director of Customer, People and Engagement.
- Where a colleague has concerns about significant issues in any area of this policy, they must escalate these concerns through their line management structure, and ultimately to the Executive Team.
- Where a colleague continues to have concerns about significant issues in any area of this policy, they should refer to the whistleblowing section within the Group's Working Professionally Policy, which can be found on the Policy Hub on the Gentoo Intranet.

Monitoring

- This policy will be reviewed three years, unless business needs or legislative changes dictate that we review it before this time.
- This policy may be subject to an audit in line with the internal audit plan.
- This policy is a grade 1 and changes will need the approval of the Executive Team.

Core Purpose, Vision and Themes

- Our core purpose is to provide warm, safe and decent home for our customers of today and tomorrow.
- Our vision is to become the best provider of social homes in the country.
- Our values are what we stand for and what we want to be known for. They are what makes us, us.
 - We care about people.
 - We take accountability.
 - We shape the future.
 - We bring leadership.
 - We deliver.

- We live our values in everything we do from the boardroom to the front room, to deliver our priorities for our customers.
- We have identified six themes which will guide the delivery of our services and support the Group's vision and ambitions for the next 10 years.
 - The best provider of social homes in the country.
 - A housing provider that listens and sorts things out.
 - Helping our communities to thrive.
 - Achieving growth through partnerships and innovation.
 - A professional, caring, great place to work.
 - Embracing modern technology and data.

Regulation and Legislation

- The Executive Director of Customer, People and Engagement will ensure this policy has regard to all legislation, regulation and best practice. The regulations and legislations applicable to this policy are:
 - Anti-social Behaviour, Crime and Policing Act 2014
 - Hate Crime: The Crime and Disorder Act 1998
 - Protection from Harassment Act 1997
 - Safeguarding Vulnerable Groups Act 2006
 - Disabled Persons (Services, Consultation and Representation) Act 1986
 - Mental Capacity Act 2005
 - The Equality Act 2006 & 2010
 - The Human Rights Act 1998
 - Financial Services and Marketing Act 2000
 - The Housing Act 1985, 1988, 1996 & 2004
 - Housing and Regeneration Act 2008
 - Data Protection Act 1998/2018
 - Domestic Abuse Act 2021
 - The Care Act 2014
 - The Children's Act 2004
 - Homelessness Act 2002
 - Human Rights Act 1998

- This is just a general overview and should not be used as a substitute for seeking legal advice in specific cases. If there is any doubt about the law relevant to a particular case, legal advice should be sought from the Legal Team.

Roles and Responsibilities

- The key roles and responsibilities in Gentoo for this policy are set out below. If applicable, additional responsibilities for this policy are detailed in the relevant supporting procedures.

Role	Key responsibilities
Executive Director of Customer, People and Engagement	<ul style="list-style-type: none"> • The Executive Director is accountable for ensuring this policy has regard to all legislation, regulation, and best practice and for ensuring the implementation of this policy effectively. • The Executive Director is accountable for adequate resourcing and having effective processes in place to implement this policy.
Head of Neighbourhoods	<ul style="list-style-type: none"> • The local Heads of Neighbourhoods are responsible for the day-to-day delivery of this policy at a local level, but more specifically, the Operations Manager (Community Safety & Safeguarding) is the operational lead.
All Housing colleagues	<ul style="list-style-type: none"> • All housing management colleagues are responsible for familiarising themselves with this policy and associated procedures.

Associated Procedures and Processes

- This Policy should be used in conjunction with:
 - Vulnerability Procedure
 - Hate Crime/Incidents Procedure.
 - Malicious Complaints Procedure.
 - Illegal Money Lending Procedure.
- Also refer to the following policies and procedures where appropriate to provide support and assistance:

- Domestic Abuse Policy & Procedure
- Community Safety Policy & Procedure
- Safeguarding (Children & Adults at Risk) Policies & Procedures
- Anti-Money Laundering Policy & Procedure
- Tenancy Management Policy & Procedure
- Income Management Policy & Procedure
- For access to these documents, please contact the Policy Owner or Policy Author of this policy.

Policy Outcomes

- This vulnerability policy seeks to:
 - Treat customers with support needs as individuals
 - Make reasonable adjustments where individuals require additional support in obtaining and maintaining a tenancy with Gentoo Group
 - Ensure responses and support offers are joined up and flexible and tailored to life events or personal circumstances.
 - Encourage vulnerable customers to make their own choices and decisions about the services they want

Policy Detail

Training

- Gentoo will ensure that all staff receive the appropriate training to enable them to carry out their responsibilities as stated in this policy.

Data Records

- All data regarding vulnerable customers including all contacts and attempted contacts, offers of support, any agencies involved etc. should be stored in a single, secure location and robustly monitored in line with governance regulations on the appropriate secure computer system.

User Defined Characteristics

- The Group uses UDCs which hold information about individual customer requirements, for example communication needs, disabilities etc. This information

is accessible in the Orchard system and is transferred onto the handheld technology and/or printed works orders utilised by trade staff so they have this information in advance of visiting a customers' home.

Data Protection

- The 'Basic Principles' of data protection are that personal information should be shared on the basis that it is:
 - Necessary for the purpose for which it is being shared
 - Shared with only those who have a need for it
 - Accurate and up to date
 - Shared securely and in a timely fashion
 - Not kept for longer than necessary for the original purpose

Confidentiality

- We will treat all information received in a private and confidential manner.
- We will only disclose information to third parties once we have the consent to do so.
- We may, however, have a legal obligation to pass information on, for example to the Police or other relevant agencies.
- This policy fully complies with the Group's Data Protection Policy.

Version Control

Version history			
Version	Amendment details	Date	Revised by
1.0	Full review of policy	March 2018	Sarah Treadwell & Julie Lister
2.0	Amended format	March 2018	Sarah Treadwell
2.1	Changes made as per staff consultation	May 2019	Mel Smith
2.2	Changes made as per customer consultation	June 2019	Mel Smith
2.3	Final changes made – add in Data Protection paragraph, proof read	August 2019	Mel Smith

3.0	Approved by Michelle Meldrum	August 2019	Sarah Treadwell
4.0	Full review of policy	December 2022	Julie Lister
4.0	Approved by Susie Thompson and format amended by Chloe Appleby	February 2023	Susie Thompson and Chloe Appleby
4.1	Updated core purpose and values priorities	August 2023	Catherine Loftus
4.2	Updated titles, references, language, policy grading and formatting.	April 2025	Julie Walker/ James Taylor/ Chloe Appleby
5.0	Confirmed with Chris Roberts this is the final version to be circulated to Exec Team for final sign off.	January 2026	Chloe Appleby