

'General needs' does not mean 'no needs': Vulnerability in general needs housing

AUGUST 2025

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We all understand that residents in supported housing are considered to be vulnerable. But that does not mean tenants in general needs housing have no additional needs, risk factors or complexity to their personal situation. Particularly in the wake of the Housing Ombudsman's Spotlight report 'relationship of equals', it is clear we have work to do to ensure the diverse needs of all our tenants are respected and catered for.

The Regulator of Social Housing emphasises the importance of recognising tenants' diverse needs in the Transparency, Influence and Accountability Standard and of appropriate adaptations in the Safety and Quality Standard. They, too, expect general needs housing providers to avoid a 'one size fits all' approach and to consider how they meet the needs of vulnerable residents.

Drawing on work from across the sector and case studies from a recent HQN event on diverse needs, this briefing focuses on understanding of what it means to be vulnerable and how we can shape our services to account for those vulnerabilities.

What is vulnerability?

'Vulnerability' is a term with no universal definition across all services which use it. While disability is defined under the Equality Act 2010 and disabled tenants are often the first who come to mind when vulnerability is considered, they are not the only group who could be considered vulnerable.

The Housing Ombudsman

In its relationship of equals Spotlight report, the Housing Ombudsman highlights that vulnerability is an imperfect term in need of a statutory definition. Despite this, it uses the terms "vulnerabilities" and "vulnerable residents" throughout and highlights some key facts about vulnerability:

- Vulnerability is not always a permanent state. How and if a person is vulnerable can change over time or depending on circumstances
- External and structural factors can make people more vulnerable
- Because vulnerability is influenced by multiple factors, it does not look the same for everyone who is considered vulnerable
- Some people who meet the criteria may not consider themselves to be vulnerable
- In some cases, vulnerability can be exacerbated by a person's living situation or how a landlord responds to a resident and their needs
- Although residents have a responsibility to inform their landlord about their vulnerability and any associated support they require, they may avoid doing so, particularly if they are not confident what the effects of sharing this information will be.

Awaab's Law

The first phase of Awaab's Law will come into force in the social rented sector from 27 October 2025. From this date, social landlords will have to address all emergency hazards and all damp and mould hazards that present a significant risk of harm to tenants within fixed timeframes.

In 2026, regulations will be expanded to cover a wider range of hazards which present a significant risk of harm. In 2027, this will expand further to cover all hazards included in the Housing Health and Safety Rating System (HHSRS), excluding overcrowding.

Despite the lack of a singular definition of 'vulnerability' in law, vulnerabilities are expected to be considered from the outset when assessing the risk posed by these hazards. To determine whether there is a significant risk of harm, landlords need to have a clear picture of not just your properties, but also of your residents' needs and vulnerabilities.

To achieve this, landlords should be collecting relevant data on residents' circumstances when they initially report any hazards – or even proactively beforehand – and ensuring it influences your response to the reported hazard. This allows you to take the correct actions and adhere to the relevant timescales.

The government issued guidance on [understanding and addressing the health risks of damp and mould in the home](#) in August 2024, which provides examples of groups who are most at risk of health issues from damp and mould. This includes people with a pre-existing health condition or weakened immune system, people who are bedbound, housebound or have mobility problems and children. If someone from one of these groups lives in a household where damp and mould have been reported, they would be considered particularly vulnerable and to be facing even more significant risk.

Factors influencing vulnerability

- **Age:** older adults are typically more vulnerable due to a range of age-related conditions (eg, reduced mobility, weakened immune systems, cognitive or physical decline) as well as situational factors such as higher likelihood of bereavement and social isolation. In addition, households with young children (who have developing immune systems and are at higher risk from most hazards) or young people without family support (who tend to struggle both emotionally and financially) also experience heightened vulnerability
- **Disability:** this covers households with one or more resident living with a disability, health condition (including mental health conditions), neurodivergent condition or chronic illness. While these conditions come under disability for the purposes of the Equality Act 2010, some of these residents may not self-identify as disabled
- **Health:** health issues and conditions which would not be classified as disabilities can also increase vulnerability. This is especially true for residents who have spent time in hospital, who may struggle to get back to normal functioning

- **Pregnancy and childbirth:** while this vulnerability is short-term, both residents who are or have recently been pregnant and newborn babies need to be considered as potentially vulnerable
- **Financial precarity:** tenants who rely on welfare payments, have precarious employment or do not have reliable income will be more vulnerable in specific circumstances, as they may struggle to pay their rent and maintain their home
- **Addiction and substance use issues:** while substance abuse is the most common addiction issue, behavioural addictions like gambling addictions may also contribute to vulnerability through its impact on finances and mental health
- **Domestic violence and abuse:** even if a resident is no longer experiencing domestic violence in the household, past experiences of it can still contribute to vulnerability, such as through lasting trauma and risks if a former partner is able to locate them
- **Other experience-based vulnerabilities:** being a care leaver, having spent time in prison, having been the victim of a crime or having been homeless can all contribute in different ways to residents' vulnerability.

This is not an exhaustive list. It is important to assess vulnerability holistically, considering each resident as an individual. Some of these traits might also intersect. For example, a person will be even more vulnerable if they are disabled and have experienced homelessness.

Examples of vulnerable tenants

Through HQN's work with housing providers across the country, we have encountered several situations which demonstrate how variable vulnerability can be:

- A resident in a high rise building with a broken leg. While they would ordinarily be able to evacuate in case of fire, the injury meant they would be unable to do so and they were therefore temporarily in need of a personal emergency evacuation plan in case of fire
- A resident who reported issues with their neighbour leaving refuse outside did not provide photographic evidence when asked. This meant that housing association staff did not escalate the issue until it led to a vermin problem. However, it later transpired that this resident had a visual impairment, making it impossible for them to follow the normal procedures
- A family with two partially sighted children requested garden fencing. Although it is typically the landlord's policy not to provide this, the children were more vulnerable because of their disability and the landlord's refusal to consider this resulted in a complaint
- During an estate inspection, a footpath was determined to be in acceptable condition, despite wear and tear. A resident challenged this, as the uneven terrain made it impossible to reach their parking space using their mobility scooter

- A tenant who complained about insufficient ventilation in their kitchen was advised that they could open their front door when cooking to allow more ventilation. Their front door opened onto a main road, which would make leaving their door open unsafe for their two children with ADHD. This had not been considered, despite the fact the landlord was aware these children lived in the property.

In order to effectively support any of these tenants, the housing provider has to know about their situation. This means that there need to be mechanisms in place for residents to communicate their specific situation or any changes to it both at the start of and throughout the tenancy and this data needs to be both effectively collected and recorded.

Housing providers must also know their stock to provide appropriately for vulnerable tenants.

In one case, a prospective tenant who used a wheelchair was brought to view a ground floor property, only to discover that there were steps inside which had not been noted anywhere. When this individual asked to view a specific property which they were aware had recently become available, the provider was reluctant as this was recorded as being a first floor property. However, on investigation, there was an external ramp to this property and adaptations had been made to accommodate a previous tenant who also used a wheelchair. This made the first floor property far more appropriate than the ground floor option, contrary to initial assumptions.

The Equality Act 2010 and reasonable adjustments

In some cases, our obligations towards vulnerable residents are statutory. The Equality Act 2010 does not cover all vulnerabilities, but it does protect tenants who are (or could be perceived as) disabled. This is a functional assessment, meaning it is based on their capability and capacity rather than whether they have been diagnosed. There are two main sections of the legislation relevant to how you manage disabled tenants' needs:

Section 20: you have a duty to make adjustments to mitigate it if either one of your policies or practices or a disabled person's physical characteristics put them at a disadvantage and to provide an auxiliary aid if not having it would disadvantage them. You can request evidence to do this but do not have to wait for a direct disclosure of a disability for this duty to apply.

Section 29: adjustments must be reasonable and some will be outside of what you are able to deliver. If you are not able to provide a specific adjustment, you will need to document why this is not feasible.

Some examples of adjustments which could help you meet the needs of vulnerable tenants include:

- Offering home visits instead of making people come to the office
- Using simplified or pictorial letters for those with learning disabilities
- Social and support worker input in ASB action plans
- Supportive payment plans that align with benefit payment schedules
- Engage advocates and support workers to resolve issues.

Recording, recognising, responding and reviewing

Case study: Hedyn

Hedyn is a newly formed housing association from the merger between Melin and Newport City Homes which owns more than 15,000 properties across south-east Wales. It uses a 'four Rs' framework to shape its work with vulnerable tenants: recording, recognising, responding and reviewing.

Recording

- Ask about vulnerability at the start of each tenancy by building a risk assessment into your initial data collection
- Make it clear why you collect this information and how you use it
- Keep your data accurate and up to date with regularly scheduled reviews
- Make it easy for tenants to update you about their situation and vulnerabilities through an app or customer portal
- Provide trades and maintenance staff, including contractors, with a straightforward, simple way to flag concerns around potential vulnerabilities if they encounter them in properties
- Record information about vulnerabilities on customer records in a way that is easy to see at a glance so your staff – including contractors visiting properties – can be aware of it when interacting with residents
 - Hedyn's customer relationship management (CRM) system combines simple visual flags for different types of vulnerability and disability with the option to click through and read more for a deeper understanding of the situation.

Recognising

- Ensure all customer-facing staff have access to data around the vulnerabilities in each household
- Train all customer-facing staff and contractors to recognise vulnerabilities and how they might manifest, including understanding and empathising when these might impact residents' behaviour or approach to your services
- Empower staff so they feel confident raising it if they suspect there is a vulnerability in a household that has not been recorded or identified
- Recognise that not all vulnerable tenants will perceive themselves as such or be willing to disclose. In some cases, it will be solely down to your staff to identify their vulnerability.

Responding

- Recognise that there is no 'one size fits all' approach and respond to each vulnerable resident as an individual
- Design policies and services with how it could affect vulnerable residents in mind
- Reach out to unengaged residents to find out what barriers may be preventing them from properly using services and what they need to overcome them
- Ensure vulnerability is included in risk assessments, emergency inspection criteria and any work which involves prioritisation of specific households
- Complex case management includes high risk vulnerability.

Reviewing

- Develop a vulnerability assurance map to track your work
- Involve your tenant scrutiny and customer voice group in developing your approach to vulnerability
- Use process mapping to identify how all aspects of your approach to vulnerable residents interact and link and where areas might be failing
- Incorporate vulnerability into your data quality strategy and assurance processes
- Use automation effectively to determine timescales of and optimise review processes
- Include having clear, up to date information about vulnerability and responding as a key performance indicator
- Remember that work with vulnerable residents cannot be a one-off project and needs to be ongoing.

Psychologically informed environments

Though there are key differences between general needs and specialist housing services, there is also a lot of knowledge and practice that can be shared.

One approach used by many specialist housing services is psychologically informed environments (PIEs). At its most fundamental level, this means using principles and knowledge from psychology to inform your behaviour, decisions, processes and procedures. The approach comes out of community mental health provision but can be applied across a wide range of services and situations.

The framework for a psychologically informed environment involves:

- Developing a shared understanding of the people your service supports and how best to respond for them
- Improving the physical spaces to encourage and support people to engage in a way that suits their needs
- Training and supporting staff to work in a therapeutic way, moving away from crisis management and into continuous support
- Managing relationships between staff, residents and other key stakeholders to work together effectively and minimise risks of harm
- Reflexive practice, continuously evaluating effectiveness and using evidence to inform actions.

Case study: Home Group

Home Group is a housing provider which offers both supported and general needs housing. They implement a psychologically informed environment across their service in a number of ways.

- **A virtual clinical hub:** a dedicated team of clinicians who support customer-facing staff, sharing insight and expertise on both specific situations and general operations. They do not interact directly with residents, but their input provides assurance to those who do. This service is funded centrally by Home Group, with expenses somewhat offset by apprenticeship funding and the benefits it offers in both staff retention and pre-empting expensive crises
- **Supporting tenancies, enabling people (STEP):** the STEP programme actively engages with tenants facing issues which could affect their ability to be independent and sustain their tenancies (eg, those coming out of hospital, at risk of homelessness, or struggling with addiction issues). It involves working with a care team to deliver a tenancy-first, customer-centric approach and figure out what each individual needs to stay in their home

- **Trauma-informed customer service:** all officers and call centre staff have a handbook and training to encourage them to approach all issues in a trauma-informed way and to understand why customers behave as they do. They are encouraged to spend more time on individual cases if that means getting it right first time and avoiding issues escalating
- **Work with contactors:** clinical colleagues promote a psychologically informed approach to contractors, emphasising acting on gut feeling when flagging concerns and pushing the importance of continuous training.

Home Group's PIE approach has seen a significant reduction in antisocial behaviour, rent arrears and tenancy failure. By being able to demonstrate the value of this work through key performance indicators, Home Group are able to make the case for further investment in this method of working.

Safeguarding vulnerable adults

In some cases, a vulnerable resident in general needs housing will also require safeguarding. Under the Care Act 2014, adult safeguarding is defined as "*working with adults with care and support needs to keep them safe from abuse or neglect*".

While the main responsibility to protect adults with these care or support needs falls to the local authority's adult social care services, housing providers are a key supportive partner in this process. This is because a housing provider is well positioned to raise concerns and understand the individual's living situation.

To do this successfully, housing providers need to have clear safeguarding policies, including a named safeguarding lead, procedure for making reports and escalating concerns and provisions for multi-agency working.

Effective safeguarding

Even though safeguarding responsibilities fall primarily to the adult social care team, housing providers still need to ensure they have the right safeguarding policies and practices in place. This means that:

- Staff are trained to recognise signs of abuse and neglect and how to report it
- Staff understand additional care and support needs and the Mental Capacity Act 2005
- You have systems in place to identify at-risk residents
- The approach to safeguarding is holistic. For example, nuisance and antisocial behaviour cases may alert you to wider safeguarding concerns around the victim or the perpetrator
- You understand the intersection between safeguarding and day to day housing management and build it into your service delivery, for example by combining wellness checks with routine maintenance

- There are resources for tenants to help them recognise, report and access support related to different forms of vulnerability
- You have links with social care services and can make support referrals as needed.

Record keeping

One of the most essential aspects of supporting adult social care services to safeguard vulnerable adults is having comprehensive records. As a housing provider, you should:

- Ensure your records are thorough, accurate and up to date
- Keep to the facts and avoid assumptions
- Document any attempts to work with multi-agency partners (eg, police, healthcare services, adult social care teams) in your documentation
- Include all contact and engagement, not just formal ones. Phone calls, emails and face to face conversations can also be relevant
- If you require medical evidence, approach your requests for this from a supportive standpoint. It is important that vulnerable residents do not feel like they are being doubted or interrogated by your attempts to gather data
- Remember that all documents could one day be under judiciary scrutiny or review.

Next steps

There are four main areas which you can develop to better serve vulnerable tenants: culture and knowledge, proactivity, partnership working and strategic changes.

Culture and knowledge

- Ensure you know your stock well, particularly in terms of its accessibility and any preexisting adaptations
- Avoid 'one size fits all' approaches or punitive responses when residents may be struggling
- Include how to communicate and work with vulnerable tenants in your training, especially for customer service roles
- Encourage professional curiosity. Housing staff should not be afraid to ask more questions to find out why someone isn't responding and should avoid shutting down when there has been no resolution without investigating the reasons why
- Build a culture where every contact counts and supporting vulnerable tenants is everyone's responsibility

- Recruit and learn from experts, including those with lived experience. This can include learning directly from tenants with personal experience of vulnerability
- Encourage staff to share their learning.

Proactivity

- Build methods for recognising vulnerabilities into existing processes and procedures, for example by adding wellbeing questions to existing tenant surveys
- Talk to residents about their needs and wellbeing during new tenancy visits and routine maintenance checks
- Investigate when a residents' behaviour changes
- Create an open, non-judgemental space for residents to disclose issues when they appear to be struggling
- Encourage staff to notice when something does not seem right and to be cautious – it is better to query something and have it turn out to be fine than to ignore early warning signs.

Partnership working

- Collaborate with NHS and council services in your area to learn from and support each other around what vulnerable people need
- Signpost vulnerable residents to charities and support services that operate in your area
- Within GDPR constraints, find out what other services are supporting specific vulnerable tenants and work with them to form a more holistic approach to the individual
- Learn from other housing providers and share your own best practice or learning experiences.

Strategic changes

- Assess your policies to see if they may disadvantage specific groups of vulnerable tenants
- Create a policy outlining how your organisation identifies, approaches and responds to vulnerability
- Consider how you communicate your policies and practices around vulnerability to tenants
- Incorporate data around vulnerability into your performance indicators and analyses, including around complaints handling and tenant satisfaction to see where services may be failing vulnerable tenants.



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