Policy Owner	Christian Blackbeard	Business Area	Housing
Document Type	Key Policy		

Customer Resilience, Vulnerability and Support Policy

"Recognise, Record, Respond, Review"

1.0 Purpose of the Policy

1.1 Coastline is committed to meeting the needs of all customers and ensuring they are treated with fairness, dignity and respect. We recognise that customers experience varying levels of resilience, support needs and life challenges throughout their tenancy.

1.2 This policy sets out how Coastline will identify, understand and respond to customers whose circumstances may affect their ability to access services, sustain their tenancy or maintain their wellbeing.

1.3 The adopts Coastline's **'Stabilise-Anchor-Navigate-Thrive'** framework to support a consistent approach to identifying and responding to changing customer circumstances. The model is explained in Section 4.

1.4 The purpose of the policy is to:

- Support customers to maintain successful tenancies;
- Promote independence and resilience;
- Prevent crises through early intervention;
- Ensure reasonable adjustments are made where required;
- Meet Coastline's safeguarding responsibilities;
- Deliver person-centred and trauma-informed services; and
- Support compliance with Consumer Standards and Housing Ombudsman expectations.

2.0 Defining Vulnerability

2.1 Coastline believes customers are not vulnerable people; they may experience circumstances that affect resilience.

We recognise that vulnerability can arise from, but is not limited to the following causes:

- Physical, mental and emotional health needs;
- Disability, sensory or cognitive impairment, learning disabilities and neurodiversity;
- Financial hardship, debt and unemployment;
- Domestic abuse, exploitation and other safeguarding concerns;
- Social isolation, substance misuse, self-neglect and hoarding behaviours;
- Digital exclusion and language and communication barriers;

- Housing instability, significant life evets and other circumstances that may affect a customer's ability to sustain their tenancy or access services;
- Long-term or chronic illness;
- Age-related factors (older people or very young adults); and
- Individuals whose health may be adversely affected by damp, mould or other issues associated with housing conditions.

It is important to note that vulnerability does not necessarily imply a lack of competence or comprehension.

3.0 Consumer Standards and Equality

3.1 Coastline is committed to ensuring that customers who are experiencing support needs, vulnerability or reduced resilience can access services fairly and achieve positive housing outcomes. We will monitor service delivery and outcomes to identify and address any inequalities in access, experience or outcomes for customers with protected characteristics, additional support needs or other circumstances which may place them at a disadvantage.

3.2 This policy supports compliance with the Consumer Standards, including the Neighbourhood and Community Standard, Tenancy Standard and Transparency, Influence and Accountability Standard, by ensuring customers are treated with fairness, respect and understanding

4.0 Stabilise-Anchor-Navigate-Thrive Framework

4.1 The Stabilise-Anchor–Navigate-Thrive framework provides a simple, strengths-based model for recognising and responding to customer vulnerability. It aligns with the National Housing Federation's (NHF) Make Every Contact Count principles, safeguarding responsibilities and tenancy sustainment objectives by recognising that vulnerability is often temporary, situational and can change over time.
The model refines Coastline's approach to understanding and using indicators about customers, helping colleagues tailor service delivery to individual circumstances, needs and risks.

The NHF describes Making Every Contact Count as using routine and planned interactions with residents as opportunities to gather information about the condition of their homes and their needs, so social landlords can proactively identify issues in homes or support needs that should be addressed.

4.2 The model helps colleagues identify needs early, respond appropriately and proportionately, and empower customers towards greater independence. The model covers a risk-recovery-independence-resilience continuum, recognising that a customers' circumstances can move over time.

4.3 **Stabilise – at significant risk**
The customer may be in crisis or facing serious pressures affecting tenancy, finances, safeguarding or wellbeing.

Anchor – additional support needed
With the right support, risks reduce and the customer starts to build coping capacity and stability.

Navigate – managing independently
The customer can manage most responsibilities with minimal support.

Thrive – stable, confident, resilient
The customer is stable, confident and able to cope with future challenges. Light-touch support only.

5.0 Legislation, Statutory Regulatory Duties & References

5.1 This policy takes account of the Equality Act 2010 and recognises that customers may experience vulnerability or reduced resilience for reasons that extend beyond protected characteristics.

5.2 Where a customer lacks capacity to make specific decisions, Coastline will act in accordance with the Mental Capacity Act 2005 and work with those who have the legal authority to act on the customer's behalf, including attorneys, deputies, appointees and advocates, where applicable.

5.3 This policy also takes account of relevant legislation, regulatory requirements and good practice, including:

- Equality Act 2010
- Human Rights Act 1998 and Human Rights at Home (guidance for social housing providers)
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Modern Slavery Act 2015
- Domestic Abuse Act 2021
- Housing Ombudsman Spotlight Report – Relationship of Equals
- The Complaints Ombudsman's Complaints Handling Code
- Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025, commonly referred to as 'Awaab's Law'.

6.0 Indicators of vulnerability

6.1 The model has been developed and should be applied using a combination of information disclosed by the customer, colleagues' observations, existing CRM and case records, and patterns across service interactions. Relevant indicators include:

- Changes in what a customer tells us about their health, wellbeing, household, finances, support network or ability to cope;
- Repeated, missed or unsuccessful contact, reduced engagement, difficulty understanding information, or changes in communication and behaviour;
- Patterns across rent accounts, repairs, complaints, anti-social behaviour, safeguarding, tenancy management and other service contacts;
- Rent arrears, financial hardship, debt, benefit difficulties or other signs of financial pressure;
- Difficulty sustaining the tenancy or meeting tenancy responsibilities;

- Neighbour disputes, anti-social behaviour, harassment, hate incidents, domestic abuse, exploitation or other safeguarding concerns;
- Changes in the condition, safety or use of the home, including disrepair, damp and mould, property damage, hoarding, neglect or self-neglect;
- A significant deterioration in physical appearance, mental or physical wellbeing, mobility or ability to manage daily activities; and
- Significant life events or changes in circumstances, including bereavement, relationship breakdown, loss of income, hospital discharge or risk of homelessness.

6.2 Colleagues interacting with customers have a responsibility to recognise, record and respond to indicators of vulnerability, taking an anticipatory approach to removing barriers and considering reasonable and proportionate adjustments at every customer contact. **(see Appendix A)**.

7.0 Recording and Reviewing Information

7.1 Where appropriate, customer records will include, such as;

- Stabilise, Anchor, Navigate or Thrive categorisation;
- Relevant vulnerabilities or support needs and impacts;
- Preferred communication methods;
- Reasonable adjustments;
- Referrals and interventions; and
- Review dates.

7.2 Information will be accurate, relevant, kept under review and managed in accordance with GDPR and Data Protection arrangements. Colleagues will receive training on how to identify vulnerabilities record and report this appropriately.

8.0 Multi-agency working and Safeguarding

8.1 Some customers may require support beyond Coastline's services. Where appropriate we will work with:

- Adult Social Care;
- Children's Services;
- NHS services;
- Domestic abuse services;
- Advocacy services;
- Welfare and debt advice agencies; and
- Voluntary and community organisations.

8.2 Where a customer is believed to be at immediate risk of serious harm, abuse, neglect, exploitation, homelessness or significant deterioration in wellbeing, colleagues must take appropriate action without delay. This may include making safeguarding referrals, escalating concerns, liaising with health or social care

professionals. All actions must be recorded in accordance with organisational procedures.

9.0 Reasonable Adjustments

"Ask the customer 'what matters to them', not 'what's the matter'?"

9.1 Coastline will make reasonable adjustments to ensure customers can access services fairly and effectively. Examples include:

- Alternative communication formats;
- Translation services;
- Extended response times;
- Home visits;
- Flexible appointments;
- Additional support during complaints; and
- Alternative methods of engagement.

Adjusted service delivery will always be proportionate, reasonable and based on customers circumstances.

9.2 Customers are asked about their contact preferences during the pre-tenancy/lettings process. All customers including vulnerable customers can change their contact preferences at any time by notifying us and this will be recorded on their contact details on CRM and/ or support plan if applicable.

10.0 Service Standards

10.1 Coastline will:

- Deliver services which recognise individual circumstances;
- Take account of support needs when making tenancy management decisions;
- Consider vulnerability and resilience in enforcement decisions;
- Promote tenancy sustainment wherever possible; and
- Ensure customers understand their rights and responsibilities

10.2 Additional support requirements will be considered within:

- Repairs and maintenance;
- Anti-social behaviour investigations;
- Complaints handling;
- Arrears management;
- Tenancy enforcement; and
- Planned investment programmes

11.0 Training and accountability

11.1 All colleagues will receive training appropriate to their role on:

- Stabilise – Anchor – Navigate – Thrive;
- Vulnerability awareness and reasonable adjustments;
- Safeguarding;
- Mental Capacity; and
- Trauma-informed practice.

11.2 Managers are responsible for ensuring the framework is consistently applied across services.

12.0 Compliance, Assurance and Monitoring

12.1 Maintaining accurate and up-to-date information is vital as vulnerabilities can change or intensify and so by having accurate and up to date customer information it allows us to put in place reasonable adjustments and/ or additional support needs.

12.2 All colleagues are responsible for complying with this policy, identifying and reporting support needs, and applying relevant training in practice.

12.3 Coastline will monitor implementation of this policy through regular performance reporting, operational oversight and quality assurance activity.

Assurance may include:

- Audits of vulnerability and adjustment records;
- Safeguarding reviews;
- Complaint analysis;
- Learning from Housing Ombudsman decisions;
- Customer feedback;
- Tenancy sustainment data; and
- Service performance reporting.

12.4 The effectiveness of this policy will be reviewed periodically to ensure it remains aligned with legislation, regulatory requirements, safeguarding arrangements and good practice.

13.0 Cross Reference with Other Policies

13.1

- Safeguarding Adults Policy;
- Safeguarding Children Policy;
- Data Protection Policy;
- Tenancy Policy;
- Care and Support Policy;
- Antisocial Behaviour Policy;
- Hoarding Policy; and
- Sustainability Fund Policy

Appendix A - Operational Guidance Notes

This appendix supports colleagues to apply the Customer Resilience, Vulnerability and Support Policy consistently in day-to-day service delivery. It should be used alongside relevant safeguarding, data protection, tenancy management, complaints, repairs and ASB procedures.

Colleagues should take every appropriate opportunity to identify when a customer may be experiencing vulnerability, reduced resilience or additional support needs. This may be during lettings, repairs, tenancy management, complaints, income collection, ASB, safeguarding, customer contact or home visits.

Recognise	Consider what the customer tells us, what we observe, existing CRM or approved system information, changes in engagement, property condition, arrears, complaints, ASB or tenancy sustainment, and whether a reasonable adjustment or additional support may be needed.
Apply the framework	**Stabilise:** immediate risk or crisis requiring prompt action, safeguarding or escalation. **Anchor:** additional support needed to reduce risk and build stability. **Navigate:** occasional guidance, adjustments or reassurance. **Thrive:** stable and able to access services with little or no additional support. The category should reflect the customer's current circumstances and be updated when risk, support needs or independence changes.
Record	Record relevant circumstances on CRM or other approved systems, including impact on access or tenancy sustainment, agreed communication preferences or reasonable adjustments, the relevant framework category, actions taken, referrals made, consent or information-sharing considerations, review date and any safeguarding or escalation action. Records should be factual, proportionate, relevant and limited to what is necessary.
Respond	Respond in a person-centred, trauma-informed and proportionate way. Ask what matters to the customer, check communication preferences, allow extra time where needed, use clear language, avoid unnecessary handoffs, and consider home visits, interpreters, advocates, alternative formats or flexible appointments. Reasonable adjustments should be agreed, recorded and reviewed where circumstances change.
Escalate immediate risk	Where there is immediate risk of serious harm, abuse, neglect, exploitation, homelessness or significant deterioration in wellbeing, act without delay. This may include following safeguarding procedures, speaking to a manager or safeguarding lead, contacting emergency services, liaising with health or social care, making referrals and recording the action taken. Safeguarding concerns must not be delayed while wider support arrangements are considered.
Review	Review ongoing vulnerabilities, support needs and adjustments at least annually, or sooner following a change in circumstances, significant tenancy, repairs, complaints, ASB, safeguarding or enforcement contact, repeat missed contact, escalating arrears, support intervention or customer request. Confirm whether the information remains accurate, whether support or adjustments are still needed, and whether any new action is required.

Quality and assurance	Managers should support consistent application through supervision, case review, quality checks and learning from complaints, safeguarding reviews, customer feedback, tenancy sustainment outcomes and Housing Ombudsman findings. Good records should show what was identified, how this affected the customer's access, tenancy or wellbeing, what action was agreed or taken, whether any adjustment, referral or escalation was needed, and when the information should be reviewed.

Appendix B – Model logic (indicators, ranking and rules)