



**London Borough of Hillingdon
Vulnerable Residents and
Reasonable Adjustments Policy
2025 – 2028**

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Introduction

In its capacity as landlord to circa 10,200 households the London Borough of Hillingdon's Landlord Service is committed to ensuring that vulnerable residents experience fair and equitable outcomes when delivering landlord related services. Fair treatment of vulnerable residents will be embedded as part of a healthy culture across all our landlord services, not just on the frontline, but also in areas such as policy development, communication and service design.

This policy explains how the council will achieve good outcomes for our vulnerable residents of landlord services, which includes our tenants and leaseholders, to make sure they can access our services. In this policy we refer to these groups collectively as residents. This policy also explains how we will make sure our tenants get the help and support they need to sustain their tenancies, give us their views and opinions, and take part in opportunities to get engaged, influence decision-making and complain about the quality of our services or the way we deliver landlord services. This policy sets out how we intend to ensure our vulnerable residents get the support they need and that this is delivered with empathy and respect.

Policy Purpose

The aim of this policy is to set out our approach to identifying and supporting vulnerable tenants. The Policy objectives are to:

- Define vulnerability in the landlord services context and explain how vulnerable individuals are identified.
- Describe how vulnerability information is monitored and consistently updated.
- Outline the Council's methods for providing vulnerable adults with the landlord services they need and making reasonable adjustments to respond to their needs.
- Detail how the Council will integrate considerations of vulnerability into decision-making processes, ensuring that services are tailored to meet diverse needs.
- Establish a framework for recording vulnerability information and signposting vulnerable tenants to other Council services when required.
- Ensure that all tenants disclosing a vulnerability receive equitable outcomes in line with those without vulnerabilities.

To achieve fair and equitable outcomes for vulnerable residents, we will seek to:

- Understand the support needs of vulnerable residents by responding flexibly and ensuring our services are accessible, consistent, and transparent.
- Through effective communication, we will ensure that our residents are informed about support services provided by other council departments and external agencies that may assist them to live well in the community.
- Provide staff with the right skills and capabilities by understanding how their role contributes to ensuring fair outcomes and treatment of vulnerable residents and ensuring they have the tools to recognise, record and respond appropriately to vulnerable residents' needs.
- Take vulnerable residents into account during service design to ensure services meet their needs.

- Ensure systems and processes support and enable vulnerable residents to disclose their needs and help staff spot signs of vulnerability, ensuring that systems can effectively note and retrieve information about a residents' needs. In addition, staff will be empowered to escalate where standard processes and procedures do not provide the right outcome for vulnerable residents.
- Ensure all communications and information about services are understandable for vulnerable residents and where possible offer multiple channels so vulnerable customers have a choice.
- Monitor and assess whether we are meeting and responding to the needs of vulnerable residents, including those with protected characteristics, and make improvements where this is not happening. ['Protected characteristics' are personal traits that are legally safeguarded under the Equality Act 2010. This means it is against the law to treat someone unfairly or discriminate against them because of these traits e.g. Age or disability].

Policy Scope

This policy aims to ensure we properly consider the vulnerabilities and protected characteristics of all our residents. This policy compliments existing policies and is not intended to replace them but seeks to ensure that, as a responsible social landlord, we achieve equitable outcomes for residents who have disclosed a vulnerability.

This policy relates to households specifically containing our named tenant who will generally be an adult. This policy primarily addresses vulnerable adult tenants but may extend to other household members where applicable.

Who does the policy apply to?

This policy applies to staff across our Landlord Service, contractors, and partners delivering landlord related services, as well as to tenants, leaseholders, and their household members where applicable. It is designed to ensure cohesive and supportive services across our landlord operations.

Legal Duties & Regulatory Requirements

The Council has a duty under the Equality Act 2010 to “advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it” (see Section 8 on Protected Characteristics). However, as a social landlord we recognise that many more tenants can be vulnerable for reasons other than the characteristics protected under equalities legislation. This policy sets out how we define vulnerability and how we aim to respond to those resident's needs.

The Regulator of Social Housing has issued consumer standards against which landlords will be inspected. The transparency, influence and accountability standard require landlords to be open with tenants and treat them with fairness and respect. The Tenant Involvement and Empowerment Standard require local authority landlords to “treat all tenants with fairness and respect” and “demonstrate that they understand the different needs of tenants, including in relation to the equality strands

and tenants with additional support needs”. There is a specific expectation that landlords will “demonstrate how they respond to those needs in the way they provide services and communicate with tenants”.

The Housing Ombudsman Complaints Handling Code 2024 states Landlords “must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.” and also “Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk.”

The Building Safety Act 2022 and Fire Safety Act 2023, plus secondary and tertiary legislative changes to the Regulatory Reform Order (Fire Safety) 2021, requires the council to identify and risk assess existing measures to protect the resident if fire occurs. The Fire Risk Assessment must consider the capacity of the resident to respond appropriately to fire alarm signals or signs of fire. Evacuation plans must consider the ability of the resident to make their way to safety, and the council must determine the level of risk to the resident from fire and emergency services response times if a “stay put” policy is in force.

Defining Vulnerability

The Housing Ombudsman defines vulnerability as:

“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.”

Our definition of vulnerability builds on that of the Housing Ombudsman to recognise the impact that vulnerability may have on a person’s ability to access our services and ability to live independently as follows:

“Residents who, due to their personal characteristics, circumstances or life experiences are either currently, or permanently, less likely to achieve equal access to landlord services, or equal outcomes when accessing those services.”

This policy is not necessarily bound by any specific legislation but by our proactive duty as a social landlord to ensure that we achieve equitable outcomes for all residents. Due to this, a general definition of “vulnerability” has been adopted which will be used broadly across all landlord service areas, for the purpose of identifying service users who may require a tailored or enhanced customer experience such as extra visits, or correspondence via braille or who require signposting to other services. This definition does not replace statutory definitions.

We understand that ‘vulnerability’ can be a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic abuse, poverty etc. The more common characteristics and drivers we take into consideration are included at **Appendix A**.

Some of these factors are a constant and some can be a life event that is not permanent such as a time limited health condition, substance misuse or domestic abuse. 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 or adjustments they may require to sustain their tenancy or lease and manage day to day activities.

Not all residents with characteristics of vulnerability will be vulnerable, but they may be more likely to have additional or different needs which, if not recognised, could limit their ability to sustain their tenancy, make decisions or represent their own interests. For example, many older or disabled people are very independent and active and may not want or need any additional assistance to sustain their tenancy and complete daily tasks independently. It is important that each tenant's unique circumstances are acknowledged and understood, and that services and support are tailored accordingly.

Key roles and responsibilities

We want to ensure that all residents can access housing and landlord services and receive the support and assistance they need. To achieve this, we will ensure staff have the skills and capabilities to recognise the vulnerability, record, (and access this information) and respond appropriately to residents needs so that we can provide fair and equitable outcomes to them.

It is important that all staff who meet residents are trained and understand their responsibilities in identifying and recording vulnerabilities. This includes for example repairs contractors, caretakers and grounds maintenance staff.

Vulnerabilities must be recorded using predefined fields within NEC Housing to ensure consistency. Examples of relevant data include any permanent conditions affecting a tenant's health or wellbeing, and temporary issues like recovery from surgery. Irrelevant information includes personal opinions not related to the tenant's living conditions or health.

Vulnerability information will be reviewed annually or sooner if there are significant changes in a tenant's circumstances, such as recovery from a medical condition, bereavement, or changes in household composition. Staff will be responsible for updating the NEC Housing system to reflect these changes.

When a member of staff identifies a service user as vulnerable (according to the definition set out in this policy) they will record the nature of the vulnerability and how the service user has been immediately assisted e.g. 'referral to Adult Social Care' and any other agencies working with the service user across the tenants' records. The purpose of recording this information is to ensure that when any future contact with the service user is made, there is a record of the level and type of vulnerability to enable members of staff to act accordingly. Staff may also liaise with agencies who are working with the service user to resolve any housing issues.

Vulnerability information is recorded on NEC Housing. NEC Housing has a pop-up flagging function that alerts Officers prior to reading the tenant details. Accurate

recording and management of vulnerability data is essential for providing appropriate support to our residents. The NEC Housing system is configured with specific data fields designed to capture relevant information, ensuring consistency and preventing the entry of irrelevant data. All staff must use these predefined fields when recording vulnerabilities to maintain data integrity and protect resident privacy.

Access to this data is controlled through role-based permissions within NEC Housing, ensuring that only authorised personnel can view or edit this information. This approach aligns with our commitment to data security and the responsible management of sensitive information.

Information held regarding a person's vulnerability will be annually reviewed to ensure it is up to date and accurate.

Policy Details

We will use a three-step approach to recognise and respond to vulnerability. This three-step model is loosely based on the successful Police Thrive Model that has transformed services using the theory of change to help services wishing to understand individual's vulnerabilities and suitable methods to appropriately respond regardless of the sector.

- **Recognition:** How to spot the signs of vulnerability.
- **Responding:** How to create a safe, trusting environment to encourage the disclosure of risk/ harm and elicit the information required to inform appropriate actions to keep people safe.
- **Support:** How the organisation can support frontline staff to recognise and respond to vulnerability within the scope of their duties.

When a service user contacts the Landlord Service there is an opportunity to identify whether they are vulnerable. Given that someone can become vulnerable at different stages of their lives it is essential that identification of vulnerability is not just at the point of first contact but is picked up whenever contact is made.

There are several signs that someone may be vulnerable. These may include, but are not limited to the following:

- Concerns about an adult whose care and support needs are not being met.
- Falling into rent arrears or other debt problems.
- Issues with maintaining their tenancy.
- Being the victim, or perpetrator of anti-social behaviour, hate crime or harassment.
- Dispute with neighbours.
- Damage to the person's home.
- A detrimental change to a person's physical appearance.
- A failure to respond to correspondence or to answer the door when visited.
- Self-neglect, hoarding or other behaviour which results in the person's home and/or garden becoming damaged, neglected or otherwise unfit for occupation.

Vulnerability can be identified by staff in several ways:

- Application forms with vulnerability declarations, homelessness applications, transfer applications, and repair history logs for adaptive or accessible repairs.
- During the initial tenancy sign up or during other home visits.
- Over the phone.
- Notification from relatives, neighbours, or friends.
- During scheduled visits to sheltered housing tenants.
- Repairs and Maintenance contractors expressing concern that someone may require some extra support or there are safeguarding concerns. They should report any concerns to the Housing Officer to help resolve unmet needs.
- Notification or referrals from professionals or external agencies, such as social workers, occupational therapists, health visitors, Police, care managers or GPs.

We will seek information from our leaseholders regarding vulnerable residents of leasehold properties who may need assistance in the event of an emergency so that we are able to meet our duties as a responsible landlord. Whilst our leaseholders have a duty to provide us with this information, we will seek it from them annually.

How vulnerable adults are supported

General signposting and referrals

When a member of staff identifies a vulnerable adult, they will seek to signpost or refer the person to appropriate support if it is needed. Some of the services signposted or referred to may include for example:

- GPs and other medical professionals such as health visitors.
- Mental health services.
- Adult Social Care.
- Substance misuse services
- Domestic abuse services
- Debt advice and welfare benefit services.
- Advocacy services.

It is also recognised that carers, who are caring for vulnerable individuals in a voluntary capacity (e.g. partner, relative or friend) may also need support in fulfilling their responsibilities and in looking after their own wellbeing. Carer's will be signposted, wherever appropriate, for carer's assessments and/or to other carer's support.

Mental Capacity

In line with the Mental Capacity Act 2005, we will always assume capacity, but in circumstances where this is in doubt we will ensure that we liaise with appropriate services to ensure that the needs of the resident are met, We will always liaise with those who have legal authority to act on behalf of our residents who lack capacity. That may be a representative who has or is a:

- Lasting Power of Attorney (LPA)
- Deputyship Order from the Court of Protection

- Litigation friend appointed in Court proceedings if the resident 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.

Safeguarding vulnerable adults from abuse and neglect

Safeguarding duties apply to adults who:

- Have needs for care and support (whether they are receiving any services) and are experiencing, or at risk of abuse, neglect or harassment.
- As a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse or neglect.

If a safeguarding concern is identified by a member of staff, they must follow the Council's adult safeguarding procedure to make a referral to Adult Social Care or Children's services.

When a safeguarding concern is reported by a contractor, it should be reported to the service for escalation. Contractors are not expected to make safeguarding referrals.

Reasonable Adjustments

We will make changes to how we provide services so that vulnerable residents are not disadvantaged. These changes, which can be small or significant, are called reasonable adjustments. They help to ensure equality of outcome.

We will decide what adjustments are needed on a case-by-case basis by discussing the requirements with vulnerable residents and their representatives and seeking to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about whether a reasonable adjustment is needed or about what the adjustments should be.

The following are examples of possible adjustments:

- Allow more time than we would usually for someone to provide information that we needed (it may not always be possible for us to provide additional time to customers if there are legislative deadlines to meet).
- Provide specialist equipment e.g. replacing taps or door handles.
- Offer face to face contact and a named point of contact.
- Provide additional support such as a sign language interpreter.
- Allow more time for meetings and face to face interviews, with breaks as required.
- Change where meetings take place.
- Offer information in different formats e.g. large print, braille.
- Offer multiple communication formats e.g. phone, letter, digital.

- Agree with vulnerable residents how they wish us to contact them e.g. phone calls only or prefer not to receive emails.
- Offer to make appropriate referrals to agencies who may provide specialist help and support

In most cases, we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. In some cases, we may need to consider in more detail how best to overcome the difficulty a vulnerable person is experiencing. We will consider lots of factors when deciding what reasonable adjustments to make including:

- **Effectiveness** - how effective an adjustment might be to prevent the disadvantage. Wherever possible the adjustment should fully address the disadvantage it is meant to overcome.
- **Practicality** - whether it's possible to make the adjustment in an easy way.
- **Resources** – whether the resources required to carry out the adjustment are proportionate to the impact. For example, employing a specialist officer to provide support may be appropriate if there are several people who require the specialist support, but it may be more appropriate to buy in a specialist when needed if the skills are rarely required.

We will ask people if they need an adjustment in the following ways:

- by asking about special requirements when residents call us to request a service
- by including a paragraph in written communications
- by including a note on our published documents indicating that we can provide the document in an alternative format on request

We will also publish this policy on our website when it is finalised as part of a communications plan to make sure residents are aware. To help with explaining what this Policy means, we will also create a Service Standard which sets out our offer to vulnerable residents.

We will record reasonable adjustments on our customer database so that staff delivering the service are aware. We will also periodically review the adjustments to ensure that they remain effective and make changes as needed.

Provision of Services

In line with our vision and values, we will create and champion a culture that prioritises the fair treatment of vulnerable residents and embed in our ways of working consideration of their individual needs, abilities and circumstances in our service delivery.

We recognise that some groups of people may have a higher chance of being vulnerable, but we will not define whole groups of people as automatically vulnerable by default. A person-centred approach will ensure residents and customers receive the required service, advice or assistance needed.

As part of our service delivery the council provides and commissions services for vulnerable residents. Where a vulnerable resident has been identified, they will be

assessed for further advice and support and where appropriate referred to other commissioned services e.g. for welfare benefits advice, or to other relevant council services e.g. adaptations, or to other local service providers.

Each service area will consider what additional support or reasonable adjustment is appropriate for vulnerable residents. Where reasonable adjustments are needed, these will be recorded within the resident's customer record. Additional support and reasonable adjustments will vary from service to service, but some examples are:

- allowing longer for customers to answer their door when we call for an appointment
- arranging a joint visit of servicing engineers with carers, support workers or housing officers with hoarders or those known not to let people in due to mental health needs
- changes to communication formats e.g. phone, letter, digital.
- visits in person where we would normally provide a phone service; explain a letter over the phone in addition to sending it
- providing or referring for additional support for an ASB (Anti-Social Behaviour) perpetrator with mental health needs: ensuring that safety risk assessments consider vulnerabilities and acknowledge that any increased risk is incorporated into plans to keep people safe.

Communication

Tenants will be asked about any communication needs when they attend the tenancy sign up and at other opportunities and interactions during their tenancy. We will make documents available in other languages and formats such as large print. We will use interpreters including British Sign Language interpreters.

Whilst residents are asked to convey any communication needs when they first approach the service, we will also use other opportunities to meet communication needs during their tenancy. This ensures that we can communicate with the resident in the best way possible and in a way that is tailored to their individual needs.

Staff will also strive to use clear, jargon free language when communicating with vulnerable residents to ensure that information is easily understood.

Residents can also ask that correspondence is sent to someone who has 'delegated authority' to act on their behalf.

Compliant Handling

Where we know that vulnerable tenants and leaseholders who complain about landlord services, we will ensure that they:

- know that they can complain in a way that suit them best
- deal with them about the complaint in their preferred manner as much as possible whilst recognising the consistency of approach and record-keeping
- ensure that they are supported to get an equitable outcome from complaints

- ensure that they fully understand the how we have dealt with the complaint and arrived at decisions.

Lettings

When allocating our homes, we will review any information we already hold or receive regarding vulnerability to help us ensure any offer of housing is right for the individual and their family, as a commitment to longer-term tenancy sustainment. We will require confirmation from a medical professional or other support agency of the tenant's circumstances before giving any additional priority due to vulnerability in line with our Allocations Policy.

Any prospective tenant deciding to enter a tenancy agreement must be able to understand:

- their obligation to pay rent as a tenant and to occupy and maintain the interior of the home
- the landlord's obligations – for example to maintain the property
- that failure to keep to the terms of the tenancy agreement may put their home at risk

When we let a home, new tenants will be encouraged at the tenancy sign up to tell us about the needs of any vulnerable household member and any existing care and support services received or that may be required. We will proactively but sensitively ask about this. We recognise that needs can change and so will continue to ask about this during other key interactions with residents and especially during the first year of the tenancy. Where appropriate, a referral can be made to an external support service, or we can provide additional advice and support from our own services.

Rent Arrears

All tenants must pay their rent in a timely fashion. We advise and support those who are struggling to make these payments and offer a range of support to all tenants who need it to sustain their tenancies. We will ensure tenants and/or their carers who approach us for help or who fall into arrears access services to ensure the tenant is maximising their income, supported in managing their budget, and has a realistic plan to repay their rent and arrears. For vulnerable tenants we will make sure that those services are accessible and consider any reasonable adjustments required. We recognise that some vulnerable tenants may have other money problems and difficulties with budgeting and can offer support as part of our tenancy sustainment role.

Repairs including Damp and Mould

We understand that vulnerable residents may find it more difficult to manage if something goes wrong in their home and they need a repair. We also recognise that some vulnerabilities place residents at greater risk when a repair is needed, for example a child with disabilities living in a home with a broken window restrictor, or a tenant with asthma reporting mould and damp.

When a resident contacts the council to report a repair, we will proactively ask if there are any disabilities, health or support needs which should be taken into account and whether any special arrangements or reasonable adjustments should be put in place whilst waiting for the repair or when we carry out the repair. This will be recorded on the customer record and shared appropriately with operatives and contractors so that the service can be delivered appropriately and aligned to the needs of the household. We will take particular care to stay in regular communication with the resident and keep them updated until the repair is completed.

Anti-social behaviour

We have a separate Policy and Procedures covering our approach to managing reports of anti-social behaviour. We risk assess all reports and prioritise them. High risk cases will include hate crimes, harassment and threats or actual violence. We work closely with the police and partner services to support residents who are victims of anti-social behaviour including those who are victimised or harassed because of a disability or other vulnerability.

We recognise that some residents may behave in an anti-social way due to behaviours related to their vulnerability. In line with our policy, we will always seek to engage them with relevant support services to improve the situation before taking any formal tenancy enforcement action. However, we do have to balance the safety and well-being of neighbouring residents with the well-being of a vulnerable resident who is behaving in an anti-social way in considering the most appropriate response.

Right of Appeal

If a resident is not satisfied with the service they have received from our Landlord Service, they can access the Council's Complaints Procedure. Anyone can file a complaint on behalf of a resident's experience of the service, providing us with insight into their dissatisfaction with the service so we can rectify, improve or resolve their dissatisfaction.

It is of utmost importance that Officers responding to complaints from residents with vulnerabilities properly consider these vulnerabilities in their response.

Support for staff

Ensuring that all staff are proficient in using the NEC Housing system is critical to the successful implementation of this policy. Training on the correct use of NEC Housing for recording and managing vulnerabilities will be integrated into staff development programmes, with regular refresher sessions provided to keep staff up to date with system changes.

To ensure that our staff felt confident in identifying and appropriately responding to the range of vulnerabilities which may present as part of undertaking their role, we will introduce mandatory annual refresher training for relevant staff groups from 2026/27.

As contractors frequently attend the homes of our residents, they are well-placed to observe potential vulnerabilities that may not be apparent to housing officers or other staff. Contractors are expected to:

- Be aware of the signs of vulnerability, such as a decline in physical appearance, issues maintaining the home, or signs of distress.
- Report any concerns about a resident's vulnerability directly to the Housing Officer or other designated staff member. Contractors should not attempt to resolve issues themselves but must ensure that concerns are raised promptly.

To support contractors in fulfilling this role, we will be recommending that they receive appropriate training and collaborate with Council staff in attending joint training events, which may include:

- Safeguarding training, focusing on vulnerable adults.
- Mental health awareness and understanding signs of distress.
- Basic training on how to identify and report concerns related to physical or mental health vulnerabilities.

Compliance and monitoring

Compliance with this policy will be monitored through regular reviews. This will include case audits by the relevant manager and service audits to ensure all our residents are able to access our services and receive equitable outcomes.

We will handle and process personal data about vulnerability in accordance with the current Data Protection Act, General Data Protection Regulations, and our Data Protection Policy.

We will record related training undertaken by staff groups and our contractors.

Governance			
Effective from:	15/12/2025	Review Date:	15/12/2028
Policy Owner:	Assistant Director of Homes & Neighbourhoods		
Policy Author:	Housing Project Delivery Manager		
Approved by:	Cllr Tuckwell – Cabinet Member for Planning, Housing & Growth		
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Appendix A – Drivers of Vulnerability and Associated Characteristics

There are many situations and circumstances that may lead to a resident becoming vulnerable. All residents are at risk of becoming vulnerable and this risk is increased by characteristics of vulnerability related to four key drivers. The table below gives examples of the types of circumstances and characteristics under these four drivers which can lead to residents having additional or different needs. This is not an exhaustive or definitive list.

Characteristics	Life events	Barriers	Housing factors
Elderly or frail	Bereavement	Literacy and language	Overcrowding
Care Leavers	Care leaver/ children removed	Low/no English.	Unsuitable from a medical perspective
Carers	Recently left institution	Mental illness	Damp and mould or other severe repair issues
16-21	(prison, hospital etc)	Chronic poor health	Ongoing ASB or criminal activity in block
Disabled/disabled children	Recently left supported accommodation or refuge	Self-neglect/ Hoarding	Unresolved tenancy issue
Living with a terminal illness	Recently experience domestic, racist, homophobic abuse	Potentially violent/abusive	Significant rent arrears/bedroom tax
Refugees/former asylum seekers	History of fires/arson	Long term unemployment	Hoarding/gas capped
Ex service personnel	Link to criminal gangs	Lack of trust in services	Awaiting Social Priority move
History of trauma/abuse, especially in childhood	Multiple debts/financial insecurity	Multiple disadvantages	
Sensory needs	Pregnancy, birth including still birth/miscarriage.		
Disability / Learning needs			
Autism spectrum disorders.			

Protective factors			
Strong family/ informal support network	Professional support in place/previously received where needed	Able to ask for help when needed	Adequately housed
Leisure activities and interests		General positive and proactive	No repair issues

	Adequate income	when dealing with adversity	No neighbourhood/ ASB related issues
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