

Customer Access Review – Full Assessment

Assessment details	
Assessment area	Vulnerable Adults Housing Policy
Date of assessment	August 2026
Directorate and Service	Housing and Public Protection, Housing Services
Manager	Housing Development & Policy Manager
Officer conducting assessment	Senior Housing Policy & Performance Officer
Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	Dartford Borough Council's Housing Service aims to ensure that everyone can access and benefit from its services but appreciates that vulnerable service users may need additional support and advice. The objectives of the Vulnerable Adults Housing Policy are to set out: • How vulnerable adults and their support needs are identified by the Housing Service. • How vulnerable adults are assisted to access the Housing Service. • How the Housing Service meets the needs of vulnerable adults and provides support. • The safeguards which are in place to protect vulnerable adults from harm. • How the Housing Service will signpost and refer vulnerable adults to other organisations, when they require additional and/or specialist support. The policy has been reviewed to ensure it remains up to date, and this assessment has been carried out in conjunction with the review.
2. Who will be affected by the activity or proposal?	The Vulnerable Adults Housing Policy affects vulnerable housing service users, including Council tenants and leaseholders, housing and homelessness applicants, and occupants in the private housing sector.
3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	a) There are no key performance indicators specific to the Vulnerable Adults Housing Policy. b) The Vulnerable Adults Housing Policy contributes to the Corporate Plan core value to provide accessible services to all.
4. Which aspects of the activity or proposal are dictated by legislation/regulation and	The Vulnerable Adults Housing Policy is a discretionary policy. However, the policy has regard to legislation such as the Mental Capacity Act 2005, Equality Act 2010, Care Act 2014, Domestic Abuse Act 2021, and UK GDPR and Data Protection Act 2018.

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
where do we have discretion in how they are delivered?	The policy and its delivery is intended to be compatible with the Regulator of Social Housing’s Transparency, Influence and Accountability Standard which requires the Council, as a social housing landlord, to treat all tenants with fairness and respect and take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants. This means the Council must: a) use relevant information and data to understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and assess whether fair and equitable outcomes are delivered for tenants. b) ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate for the diverse needs of tenants. c) ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required. d) allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services. In addition, the Regulator’s Tenancy Standard requires the Council to provide services that support tenants to maintain their tenancy or licence and prevent unnecessary evictions. The policy defines ‘vulnerability’ as a ‘dynamic state which arises from someone’s personal circumstances, protected characteristics and/or lived experiences that may mean they are unable, either temporarily or permanently, to independently manage without additional support. The policy is not bound by legislation and because of this the above general definition of ‘vulnerability’ has been adopted which is used broadly across all Housing Service areas, for the purpose of identifying service users who may require tailored and additional support (such as extra visits or assistance to fill out forms and claim benefits) or who require signposting or referring to other services. The policy recognises that the Housing Service will also use statutory definitions of vulnerability in carrying out its functions, for example, the homelessness legislation definition of vulnerability. The policy definition does not replace statutory definitions.

Customer Access Review – Full Assessment

Step 2: Information collection	
5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)	Vulnerable adults are identified in a number of ways by the Housing Service, for example: • Various application forms that include a vulnerability checklist, for example, for the housing register, homelessness service, disabled facility grants and private sector leasing scheme • Vulnerability risk assessments for anti-social behaviour cases or tenancy management issues • During the initial tenancy sign-up of a tenancy or during other home visits • Tenant Round Up (TRU) tenancy audit visits and Equality, Diversity and Inclusion information collection drives for Council tenants • Over the phone • Notification from relatives, neighbours or friends • During daily calls or weekly visits for Housing Scheme tenants • Housing support concern card. If a repairs or gas servicing contractor has concerns that a tenant may require some extra support or there are safeguarding concerns, they complete a 'concern card' and then return it to the Housing Officer. The Housing Officer then contacts the tenant to resolve any unmet need • Visits to inspect housing conditions in the private sector • Notifications from professionals, such as Occupational Therapists, the local Home Improvement Agency, Hospital Discharge Team, Fire Service, Care Managers, GPs, Police, or through the Duty to Refer A record of any known vulnerability will be made to ensure staff have knowledge of any additional factors to consider when delivering services.
6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings	Consultation will be carried out to inform the review of the Vulnerable Adults Housing Policy, as set out below in question 7.
7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?	Internal consultation – Council officers will be consulted in the review of the Vulnerable Adults Housing Policy. Resident consultation – The Council is committed to ensuring the voice of residents is heard on matters that affect them. The Regulator of Social Housing places a requirement on social housing landlords to comply with the Transparency, Influence and Accountability Standard 2024, by ensuring that residents are given a wide range of opportunities to influence and be involved in the formulation of their landlord's housing-related policies and strategies. Consultation with Council tenants will be undertaken, as follows:

Customer Access Review – Full Assessment

Step 2: Information collection	
	1. All Council tenants and leaseholders will be invited to comment on the draft updated Vulnerable Adults Housing Policy. 2. The Dartford Tenants and Leaseholders Forum (DTLF) will be invited to comment on the draft updated Vulnerable Adults Housing Policy. The DTLF aims to ensure that the services delivered by the Council are accessible to all. The Forum works as a group to ensure that the views and housing needs of residents are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery. 3. The Housing Advisory Board (HAB) will be invited to comment on the draft updated Vulnerable Adults Housing Policy. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and DTLF members. Wider public and external agency consultation – Members of the wider public and external agencies will have the opportunity to provide feedback on the draft updated Vulnerable Adults Housing Policy through the dedicated consultation webpage on the Council's website.

Step 3: Assessing the equality impact	
8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty: a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations <u>NOTES:</u> • The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration • For existing activities, consider how they are working in practice for each relevant protected group • For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group • If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9 • If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9	

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	The Vulnerable Adults Housing Policy aims to help people access housing services and fully participate in its activities. The policy sets out the reasonable adjustments made where vulnerable service users may face barriers or need support. Reasonable adjustment means a change to service provision which seeks to, as far as possible, to remove any disadvantage faced by those with a protected characteristic or a vulnerability. This may include, for example, extra home visits, assistance to fill out forms etc. The policy explains the support provided to service users, to which age may be a factor in their vulnerability. The support provided leads to better outcomes for vulnerable service users – e.g. tenancy sustainment, support to stay in their home or to move home.	A potential negative impact could arise in practice due to failure to act on vulnerabilities and/or protected characteristics because they are not identified or recorded, or failure to take known vulnerabilities/protected characteristics into account when making decisions or providing services. The current Housing Service Improvement Plan contains actions to improve the collection and recording of vulnerabilities/protected characteristics, including: • To contact all Council tenants to check that their equality and diversity information is correct and up to date. • The information collected on the equalities monitoring form that is completed at the allocations stage has been reviewed to ensure it captures relevant information. • An Accessibility Procedure is being developed to ensure each team is collecting the Diverse Needs attributes for Council tenants and recording the attributes on One Housing. • To ensure that the Tenant Round Up (TRU) tenancy audit visit forms are continuously being uploaded on to the housing system and the personal records of tenants. • To develop a plan and monitor to ensure the preferred contact methods for Council	☐	☐

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
		tenants remain up-to-date and are being used correctly.		
Disability	The Vulnerable Adults Housing Policy aims to help people access housing services and fully participate in its activities. The policy sets out the reasonable adjustments made where vulnerable service users may face barriers or need support. Reasonable adjustment means a change to service provision which seeks to, as far as possible, to remove any disadvantage faced by those with a protected characteristic or a vulnerability. This may include, for example, extra home visits, assistance to fill out forms, assistance to claim welfare benefits, assistance with sign language interpreters etc. The policy explains the support provided to service users, to which disability may be a factor in their vulnerability, including physical disability, illness, mental health problems, learning disabilities, sensory impairments. The policy recognises that where a person has a sensory impairment, this may be a factor in a person's vulnerability. In accordance with the Council's Equality & Diversity Document Framework, information can be provided in alternative formats, including: Braille, audio tape and large print versions of documents. British Sign Language interpreting services can be	A potential negative impact could arise in practice due to failure to act on vulnerabilities and/or protected characteristics because they are not identified or recorded, or failure to take known vulnerabilities/protected characteristics into account when making decisions or providing services. The current Housing Service Improvement Plan contains actions to improve the collection and recording of vulnerabilities/protected characteristics, including: • To contact all Council tenants to check that their equality and diversity information is correct and up to date. • The information collected on the equalities monitoring form that is completed at the allocations stage has been reviewed to ensure it captures relevant information. • An Accessibility Procedure is being developed to ensure each team is collecting the Diverse Needs attributes for Council tenants and recording the attributes on One Housing. • To ensure that the Tenant Round Up (TRU) tenancy audit visit forms are continuously being uploaded on to the housing system and the personal records of tenants.	☐	☐

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	provided upon request. Calls can also be received via Relay UK.	To develop a plan and monitor to ensure the preferred contact methods for Council tenants remain up-to-date and are being used correctly.		
Sex			☒	☐
Gender reassignment			☒	☐
Race	The Vulnerable Adults Housing Policy aims to help people access housing services and fully participate in its activities. The policy sets out the reasonable adjustments made where vulnerable service users may face barriers or need support. Reasonable adjustment means a change to service provision which seeks to, as far as possible, to remove any disadvantage faced by those with a protected characteristic or a vulnerability. This may include, for example, with language interpreters and translations etc. The policy recognises that where English is not spoken, or spoken only as a second language, this may be a factor in a person's vulnerability. In accordance with the Council's Equality & Diversity Document Framework, information can be provided in alternative formats, including: documents translated into other languages. Telephone and face-to-face language interpreting can be provided upon request.	A potential negative impact could arise in practice due to failure to act on vulnerabilities and/or protected characteristics because they are not identified or recorded, or failure to take known vulnerabilities/protected characteristics into account when making decisions or providing services. The current Housing Service Improvement Plan contains actions to improve the collection and recording of vulnerabilities/protected characteristics, including: - To contact all Council tenants to check that their equality and diversity information is correct and up to date. - The information collected on the equalities monitoring form that is completed at the allocations stage has been reviewed to ensure it captures relevant information. - An Accessibility Procedure is being developed to ensure each team is collecting the Diverse Needs attributes for Council	☐	☐

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
		tenants and recording the attributes on One Housing. - To ensure that the Tenant Round Up (TRU) tenancy audit visit forms are continuously being uploaded on to the housing system and the personal records of tenants. - To develop a plan and monitor to ensure the preferred contact methods for Council tenants remain up-to-date and are being used correctly.		
Religion/Belief			☒	☐
Sexual Orientation			☒	☐
Pregnancy/Maternity			☒	☐
Marriage and Civil Partnership*	This assessment does not apply in the context of employment, therefore the protected characteristic group of marriage and civil partnership has not been subject to this assessment.	This assessment does not apply in the context of employment, therefore the protected characteristic group of marriage and civil partnership has not been subject to this assessment.	☐	☐

* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

Step 3: Assessing the equality impact	
9. If 'no impact' or 'unknown' was selected, please explain	There are no known circumstances where the Vulnerable Adults Housing Policy will have a negative equality impact on a particular group. The aim of the policy is to ensure that everyone has equality of opportunity to access and benefit from the Housing Service. The policy should have a positive impact on service users by raising awareness and understanding of types of responses and support provided to vulnerable service users.

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact	
10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	The Vulnerable Adults Housing Policy sets out that the Council will signpost and refer vulnerable adults to appropriate support services if it is needed. Some of the services signposted or referred to may include: • GPs and health services • Mental health services • Adult Social Services (for care and support services) • Housing-related support (for Housing Scheme tenants) • Occupational Health • Substance misuse services • Domestic abuse services • Debt advice and welfare benefit services • Advocacy services The Housing Service will also make referrals to Social Services for care and support and where there is a concern that a vulnerable adult is at risk of or experiencing abuse and/or neglect. There are no known circumstances where these partnership working arrangements will have a disproportionate impact on the protected characteristic groups other than to positively improve the service provided to service users and ensure their needs are met. Effective communication with partnerships will ensure the correct support is provided through information sharing.
11. Any other comments	The Vulnerable Adults Housing Policy is relevant to the Equality Act 2010 aims to eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act; and to advance equality of opportunity between persons who share a protected characteristic and those who do not. The policy aims to positively affect how service users access services or participate in activities. Any service user who is not satisfied with the service they have received or who believes they have been discriminated against can make a formal complaint to the Council using the corporate complaints process.

Customer Access Review – Full Assessment

Step 4: Action plan

12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:

- a) any gaps in information and consultation
- b) how any negative impacts on equality will be mitigated or eradicated

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views from all Council tenants, leaseholders, DTLF, wider public, external agencies and the Housing Advisory Board on the draft Vulnerable Adults Housing Policy	Undertake a consultation exercise	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	September 2026	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
A potential negative impact could arise in practice due to failure to act on vulnerabilities and/or protected characteristics because they are not identified or recorded, or failure to take known vulnerabilities/protected characteristics into account when making decisions or providing services	Monitor the delivery of the actions in the Housing Service Improvement Plan to mitigate this impact	Improved collection and recording of vulnerabilities/protected characteristics	October 2026	Housing Service Update Report to Housing Advisory Board and Cabinet	Senior Housing Policy & Performance Officer

Customer Access Review – Full Assessment

Step 5: Decision making and future monitoring	
13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	Legal Services and Deputy Chief Executive (Housing and Public Protection)
14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report	☒ Yes ☐ No
15. How will you continue to monitor the activity or proposal on protected characteristic groups?	The effectiveness of the Vulnerable Adults Housing Policy will be monitored through the quality of data collected for vulnerable service users, the monitoring of additional service that are provided, and insight gathered from customer satisfaction surveys, compliments and complaints data.
16. When will you review this Customer Access Review?	The Vulnerable Adults Housing Policy will be reviewed every three years or earlier to address legislative, regulatory, best practice or operational issues. New assessments will be undertaken every three years in conjunction with the review of the policy.

Customer Access Reviews must remain on the website until the Policy or Service becomes out of date. The Customer Access Review must then be archived.

Reviewed by Legal Services:

J.Wenham

08.09.2026

Reviewed by Deputy Chief Executive (Housing and Public Protection):



28.08.2026