ABOVEBOARD

Vulnerable Customers Policy

Version 2.0 Live Effective 21 October 2026 Replaces Version 1
Owner: the Directors Review: annually

1. Purpose

To ensure vulnerable homeowners are identified, supported, and treated with empathy and fairness. Vulnerability may affect a person's ability to understand information, manage finances, or engage with property management processes. This policy gives effect to commitments in our Written Statement of Services (WSS): that we make reasonable adjustments under the Equality Act 2010, that we take vulnerability into account in how we communicate and in any debt recovery, and that we never withdraw a communication channel from a homeowner with a disability without first agreeing a suitable alternative. It also gives effect to the Property Factor Code of Conduct, which requires us to treat homeowners in payment difficulty fairly and with forbearance and due consideration.

2. What we mean by vulnerability

Vulnerability may be permanent or temporary, and may arise from: age; physical or mental health conditions; disability; financial hardship; bereavement; language barriers; domestic abuse; or a temporary crisis. A person does not need to use the word "vulnerable", or provide medical evidence, for this policy to apply.

3. Our commitments

- Treat people with patience, dignity and respect, allowing additional time where needed.
- Communicate clearly and without jargon, in the format that works for the person: alternative formats such as large print are provided at no additional charge, as set out in the WSS.
- Agree reasonable adjustments and record them so the person does not need to repeat their circumstances to different staff.
- Take vulnerability into account at two fixed points in the Debt Recovery Procedure: before the Stage 2 late payment charge is applied, and again before any legal action or Notice of Potential Liability for Costs. At each point we will consider pausing escalation, waiving or reviewing charges where appropriate, and agreeing an affordable payment plan, and we record the decision either way. While a payment plan is being discussed and maintained, recovery action is paused, as set out in the WSS.
- Never withdraw a communication channel from a homeowner who has told us of a disability or accessibility need without first agreeing an alternative that meets their needs.
- Signpost external support: for money matters, MoneyHelper, Citizens Advice Scotland, National Debtline and StepChange Debt Charity (the same agencies named in the WSS and the Debt Recovery Procedure); appropriate specialist services for other circumstances.

4. Identification and notification

A homeowner, or someone acting on their behalf such as a family member, carer or support worker, can tell us about a vulnerability at any time, through any channel. Staff may also identify possible vulnerability through communication difficulties, missed or irregular payments, visible distress or confusion, or information from third parties. Where staff suspect vulnerability, they will raise it sensitively and offer support, rather than wait to be told. We will accept a notification from anyone, but we will discuss a homeowner's account with a representative only once the homeowner has authorised it, or on sight of a power of attorney, guardianship order or similar authority.

5. Recording, consent and confidentiality

We keep two kinds of record. The first is the support flag: the adjustment itself, such as allowing extra time, contacting by telephone only, or a review before any debt recovery step. This contains no detail of the person's circumstances and is recorded whenever an adjustment is agreed or a vulnerability is reasonably suspected, so that staff apply it consistently and the person does not need to repeat themselves. The second is the underlying circumstances. Information about health, disability or other sensitive circumstances is special category data: we record it only with the person's explicit consent and only to the extent needed to provide the right support, or, without consent, only where safeguarding or the person's vital interests require it, on the lawful basis documented in our Appropriate Policy Document and Vulnerable and Sensitive Data Handling Standard. Without consent to record the detail we may not be able to fully tailor our service, and we will explain this at the time. Both records are held confidentially with restricted access, in line with our Privacy Policy, and are never placed on the development portal or anywhere other owners can see. The record of a debt recovery decision (that vulnerability was considered, the outcome, the date and who decided) is kept with the account record for the period in our Retention Policy; the sensitive detail is reviewed at least annually and removed once the adjustment or support is no longer relevant. Data protection queries go to data@aboveboard.homes.

6. Safeguarding

If a member of staff believes a person is at immediate risk of harm, they will call 999. Where there is concern that an adult at risk may be experiencing harm or neglect, we may make a referral to the local council's adult protection team under the Adult Support and Protection (Scotland) Act 2007, sharing only what is necessary. Concerns about domestic abuse will be handled sensitively, and communications managed so as not to place the person at further risk. Where domestic abuse is disclosed or suspected, we check the correspondence address, the contact details held and portal access specifically, and agree with the person how and where we will contact them.

7. Interaction with other policies

Where behaviour that might otherwise fall under our unreasonable behaviour procedure (the Unacceptable Actions Policy) may arise from a vulnerability, this policy is considered first, and any response is proportionate and takes the person's circumstances into account. This policy works alongside the WSS, the Complaints Handling Procedure, the Debt Recovery Procedure, and our data protection policies.

8. Accountability and review

The Directors own this policy. Staff receive guidance on identifying and supporting vulnerable customers. Individual cases are reviewed regularly to ensure support remains appropriate. The policy is reviewed annually, and sooner if the WSS, the Code of Conduct or relevant law changes. It is published on the development portal and available to homeowners on request, free of charge.

Version control

Version	Date	Change
Version 1	Earlier version	Original Vulnerable Customers Policy.
Version 2.0	21/10/2026	Rewritten to give effect to WSS v3.0 (OSP 3, OSP 7, Sections 2 and 4) and the Debt Recovery Procedure v1.4: two fixed vulnerability gates with the decision recorded; two-layer record (support flag and consented detail) with safeguarding and vital-interests basis; decision record retained with the account, sensitive detail reviewed annually; representative authority; portal and domestic abuse safeguards; advice agencies aligned to the WSS; Directors named as owner; published on the portal.