

Housing Diverse Needs Strategy 2026-31



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What is a Diverse Needs Strategy?

A strategy is a plan that explains what you want to achieve, why it matters, and how you will get there over time.

This strategy sets out Newham Council's plans to deliver a fairer housing service for our tenants who face barriers linked to disability, health, or life circumstances. This includes how we will adapt our services, like repairs, to make them more accessible and easier to use for a range of people, and how we will use data to make these changes.

Executive Summary

Newham's diversity means that our tenants have a wide range of needs and experiences, and a "one-size-fits-all" housing services can unintentionally disadvantage some households or put them at risk. Tenants may face barriers due to disability, health conditions, language, or life circumstances, making it harder to access repairs, understand communications, or engage with services.

This strategy sets out how we will ensure that we have a fair, responsive landlord service tailored to their needs. Our approach goes beyond compliance with legal requirements such as the social landlord consumer standards, Equality Act 2010, Awaab's Law, and fire safety regulations—we aim to embed equity, respect, and collaboration into every interaction.

Our strategy sets out how we will recognise, record, respond to, and review tenants' needs.

Recognise

Train staff to identify and sensitively discuss needs using trauma-informed approaches and professional curiosity. Introduce screening questions, language barrier protocols, and clear escalation routes for complex cases.



Record

Improve systems so that information about tenants' needs is logged consistently, kept up to date, and accessible to the right teams. This includes new case management processes, portable devices for frontline staff, and dashboards to monitor trends.



Respond

Make reasonable adjustments to service delivery—whether through changes to communication, property adaptations, or additional support—based on individual circumstances. Produce a reasonable adjustments policy, review performance.



Review

Use data and tenant feedback to measure impact and drive continuous improvement. This includes assurance mechanisms, dip-testing, and dashboards to inform future strategies.



Key actions

- Mandatory staff training on diverse needs and trauma-informed practice.
- New procedures for reporting and escalating needs.
- Improved data-sharing protocols and IT system reviews (NEC, Service Connect, Microsoft Dynamics).
- Policies, procedures and training to support service areas in implementing these commitments.
- A robust performance and assurance framework to track progress and outcomes

Expected Outcomes

Tenants experience fair, respectful, and responsive services

Staff are confident and equipped to identify and act on diverse needs

Data informs service improvements and strategic planning

Legal compliance is achieved and exceeded, with a focus on equity and wellbeing



Introduction

What are “diverse needs”?

“Diverse needs” means the different needs people may have that make it harder for them to access housing services, understand information, or stay safe. These needs can be linked to health, disability, language, family situation, money worries, or life events, and they can be short-term or long-term.

Newham’s residents are some of the most diverse in the country, and we are proud of that diversity. Our tenants come from a huge range of national, ethnic and religious backgrounds, with varied disabilities and health conditions, as well as unique life experiences and circumstances. However, like many social landlords, Newham’s housing services have historically been designed as a standard, “one-size-fits all” service, and isn’t always able to meet the full range of our tenants’ diverse needs. This gives rise to a range of issues, but at its most serious, failing to adapt to meet tenants’ needs can result in their safety being put at risk.

This strategy is all about making sure that we can identify when our tenants need us to adapt our services or provide them with additional support. This strategy does not just consider our most vulnerable tenants, although they are an important part of the picture – we aim to ensure that all tenants have a safe home and a good landlord service from the Council, no matter what their age, background, disabilities, health conditions or life experiences. To do this, we need to change the way we deliver our housing services needs to adapt to our tenants’ diverse range of individual needs.

Aims

The purpose of this strategy is to outline the steps we will take to:

- Comply with our legal requirements around safeguarding adults and children, keeping vulnerable tenants safe from disrepair, and meeting fire and building safety standards
- Ensuring that there is equitable access to our landlord services for tenants and their household members
- Improving safety and wellbeing among all tenants, no matter what their background or characteristics



Objectives

The following objectives set out the key ways in which we will achieve our aims. These objectives align with four themes that have been identified through the research, informed by the Regulator of Social Housing's Consumer Standards, particularly the Transparency, Influence and Accountability standard. The feedback from the early engagement with residents and other stakeholders has also guided the development of the themes. These form the structure of the strategy:

Treating tenants with respect

Staff will interact with tenants in a way that is respectful, ensuring there is a positive culture to respond to diverse needs.



Identifying and reporting additional needs

We will work in a proactive way to recognise when a tenant is vulnerable, and when they may require additional support or reasonable adjustments.



We will use the information we hold to identify people who may be struggling so that we can offer the right support at the right time.

Record-keeping and use of data

We will keep accurate records of tenants' needs, that are accessible to the people who need to see them



We will use the information we hold to understand if we are delivering services fairly and equitably

Tailoring our services

We will use the information we hold to adapt the way we deliver our services, including repairs and maintenance, complaints, tenancy management and resident engagement



We will ensure that tenants are able to report reasonable adjustments to ensure that our services meet their needs.

Scope

The strategy focuses on the delivery of tenant services, and so will primarily affect Council tenants, as well as households placed in temporary accommodation in Council-owned properties. There are some occasions where we may also need to adapt our housing services to accommodate the needs of leaseholders, for example where a leaseholder has additional support needs that are having an impact on neighbours who are Council tenants or when a leaseholder is resident in a tall block that is affected by recent fire safety legislation. This does not affect the responsibilities we have as a Council to safeguard and support the wellbeing of all our residents.

To inform this strategy, we spent several months conducting research. The research sought to take existing practice as its starting point, to understand what the current experience is for tenants and staff, identifying the barriers to effectively recognising, recording and responding to tenants' needs, and the opportunities for improvement.

Full details of the research, including the findings, journey map, staff profiles and tenant case studies, can be found in the Evidence Base.

Strategy framework

The strategy details the steps we will take to ensure that our housing service is able to effectively recognise, record, and respond to a tenant's needs, as well as how we review the support we provide and use this to make improvements.

- **Recognise:** This means accurately identifying when someone needs help, and knowing what kind of characteristics, conditions, or life events are likely to put tenants at a disadvantage when it comes to accessing housing services.
- **Record:** This means consistently logging data about our residents so that our information is up-to-date and relevant. It also means striking a balance between protecting the privacy of the tenant with ensuring that the right staff have access to this information when they need it.
- **Respond:** This means making reasonable adjustments when required, in agreement with the tenant, and not making assumptions about what they do or don't need. Sometimes, this involves working across teams and directorates in the Council and sharing information.
- **Review:** This means using the data we hold and feedback from tenants to assess how well our housing service is performing, and how we could improve and adapt to the changing needs of tenants.

This framework is set out in the diagram below:



The strategy builds on the Housing Ombudsman's "recognise, record and respond" framework. We have added "review", to ensure that we use data and feedback to analyse our response to tenants and ensure that we keep improving.

Understanding Diverse Needs

Our responsibilities

Under the Equality Act 2010, we have a duty to make “reasonable adjustments” when requested to ensure that people with disabilities are not put at a substantial disadvantage in how they are able to access and use their property and access services. This means making changes to the property or to how we deliver our services to ensure that the tenant is safe and benefits from their tenancy as they would if they did not have a disability. This strategy goes further than the Equality Act to consider how we can make reasonable adjustments for other characteristics which can create barriers to accessing services or put households at risk.

We also have duties related to fire safety, and in particular, evacuation of tall buildings. We are required to identify residents whose ability to evacuate without assistance might be compromised, understand risks associated with their particular needs, and develop personalised plans for what the resident should do in the event of a fire. This includes physical disabilities or mobility issues, as well as cognitive conditions.

We also have responsibilities to safeguard and promote the welfare of children who may access or use Council services as well as adults who have statutory care and support needs, are experiencing or are at risk of abuse or neglect.

Awaab's Law, which came into effect in part in October 2025, requires social landlords to consider the interaction between a range of disrepair issues (although initially focussed on damp and mould) and the characteristics of the household, assessing whether the household has any additional risk factors and expediting assessment where those are found to be present.

Under the Regulator of Social Housing's Consumer Standards, we must treat tenants and prospective tenants with respect and deliver fair and equitable outcomes for residents with diverse needs.

We aim to not only comply with our legal requirements, but to drive equitable access to our landlord services for tenants and their household members, improving safety and wellbeing among all tenants.



Diverse needs and vulnerability

We recognise that tenants or members of their household may have additional needs or face barriers which can make it harder for them to do things like:

- Get in touch with the Council
- Access services like repairs
- Take part in resident involvement activities
- Understand the communications we are sharing
- Make complaints

There are many reasons why someone might struggle with any of the above. Because this could be caused by one or more conditions or characteristics, we call these “diverse needs”.

This strategy sets out how we will identify these households, understand their needs, and adjust our services to make sure that they are not unfairly disadvantaged or put at risk as a result of these needs.

Vulnerability is defined by the Housing Ombudsman 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...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.

This broad definition is useful because it considers how someone’s personal characteristics can interact with their current circumstances. It focuses on the need to take care and make adjustments to how services are delivered, rather than on the individual. However, we know that not everyone who needs adjustments to access our services considers themselves vulnerable. For this reason, the strategy uses a broader term: “diverse needs”.

Drivers of diverse needs

There are many conditions, characteristics or circumstances that might lead to tenants being vulnerable, having additional needs or requiring reasonable adjustments to be made.

The following types of conditions and/or characteristics may increase the likelihood of a tenant or their household member being considered vulnerable, however we will consider each case on its individual circumstances, rather than taking a checklist approach:

- Physical disability or mobility issue
- Sensory Impairment
- Cognitive¹ & Neuro-divergent
- Medical condition requiring assistance
- Mental Health Support Needs/Conditions
- Social and Family Circumstances
- Legal and Safety Concerns
- Life Events
- Economic and Housing Issues

It is important to note that not all people experiencing the conditions and characteristics listed above will require adjustments to be made. Additionally, the extent to which any of the conditions below constitutes a barrier will be

¹ This includes learning disability - for a definition see: [mencap.org.uk/learning-disability-explained/what-learning-disability](https://www.mencap.org.uk/learning-disability-explained/what-learning-disability)

affected by whether the issue is temporary or permanent, as well as each individual's specific circumstances.

Reasonable adjustments

Reasonable adjustments are changes we make to how we do things, to remove barriers and support someone who has a particular need. This includes:

- Changes we make to how we deliver our services when our usual practice is disadvantaging someone
- Physical changes to a property or block to remove a disadvantage in using or accessing their home
- Additional support to help support someone's tenancy or to ensure their wellbeing

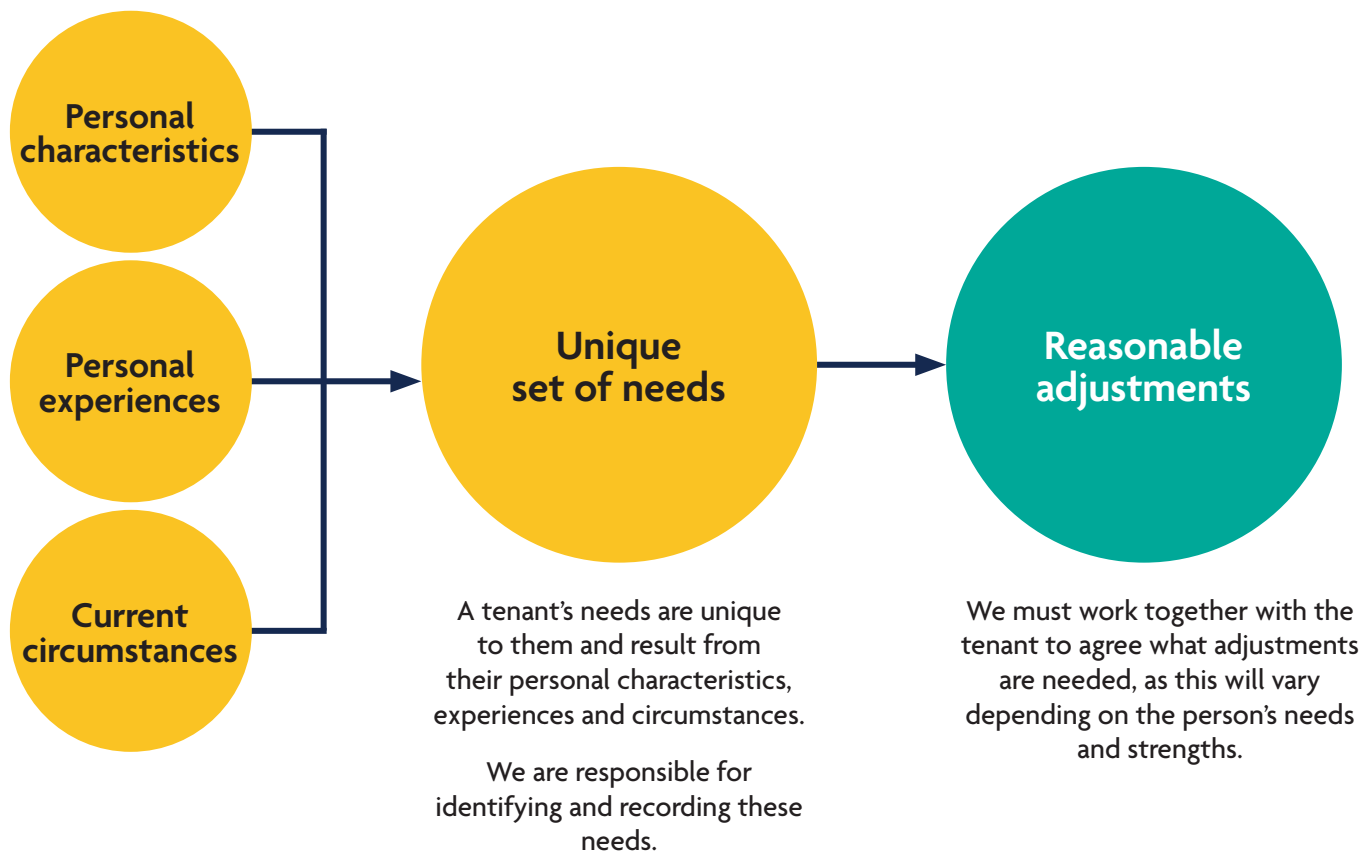
Each case will be assessed and agreed on a case-by-case basis, in collaboration with the tenant. We will take strengths-based approach, which considers an individual's abilities and their circumstances, rather than making the deficit, or the barrier, the focus of the intervention. We work with the individual tenant to identify what reasonable adjustments can be put in place to support them.

This approach is not about 'giving people less support', but working with people to identify their needs, and how we can best meet them. It is also about not making assumptions around what someone's needs are but instead working with them to agree any adjustments.

The following table sets out how conditions can lead to additional needs, as well as some examples of reasonable adjustments that could be made:

Scenario	Condition or characteristic	Need	Reasonable adjustment
A tenant needs a repair which requires a contractor to visit the property.	The tenant is elderly, with arthritis that makes it difficult for him to move around quickly.	More time to answer the door.	The contractor will attend during a pre-arranged time window and when the contractor knocks, they will wait longer than usual to ensure that the tenant has time to get to the door.
An important letter about fire safety is being sent out to all tenants in a block.	The tenant speaks Urdu and English, but her English reading skills aren't very strong. Her daughter used to help them with reading letters, but this year she has gone to university and the tenant lives alone.	Help to access information in a language that they understand.	The letter includes details of how to access translation services, written in a range of different languages.
There is a pest-control issue in a flat	The tenant has been struggling since the death of his wife and items have begun to pile up around the house. He is struggling to move around the property because of the number of piles.	Specialised support to manage the condition of the property.	The Council's Independent Living Team will contact the tenant and work with him and his children to understand his needs and to manage his hoarding, while also responding to the pest control issue. They may escalate to the Council's Adult Social Care if the hoarding is a more complex case.

Summary diagram



Our vision

Every Newham Council tenant is treated with respect, understood as an individual, and supported to access safe, fair, and responsive services, regardless of their personal characteristics, conditions or circumstances.

Measures already in place to support tenants with diverse needs

The Council's housing service has a number of measures already in place to respond to our tenants' diverse needs. These include:



Introducing a translation and read-aloud service for the Council's website



A dedicated Independent Living team to help older tenants and those with additional needs to manage their tenancies



Making adaptations to tenants' homes when required for medical reasons



Making ad-hoc reasonable adjustments when tenants request them



Collecting information about tenant's needs through tenancy audits and person-centred fire risk assessments



Hosting resident involvement events in accessible locations, wherever possible



Offering a mix of digital and non-digital communications and engagement options where possible

This strategy will build on these existing measures to improve how we recognise, record, respond to and review the cases of tenants with diverse needs.

Actions

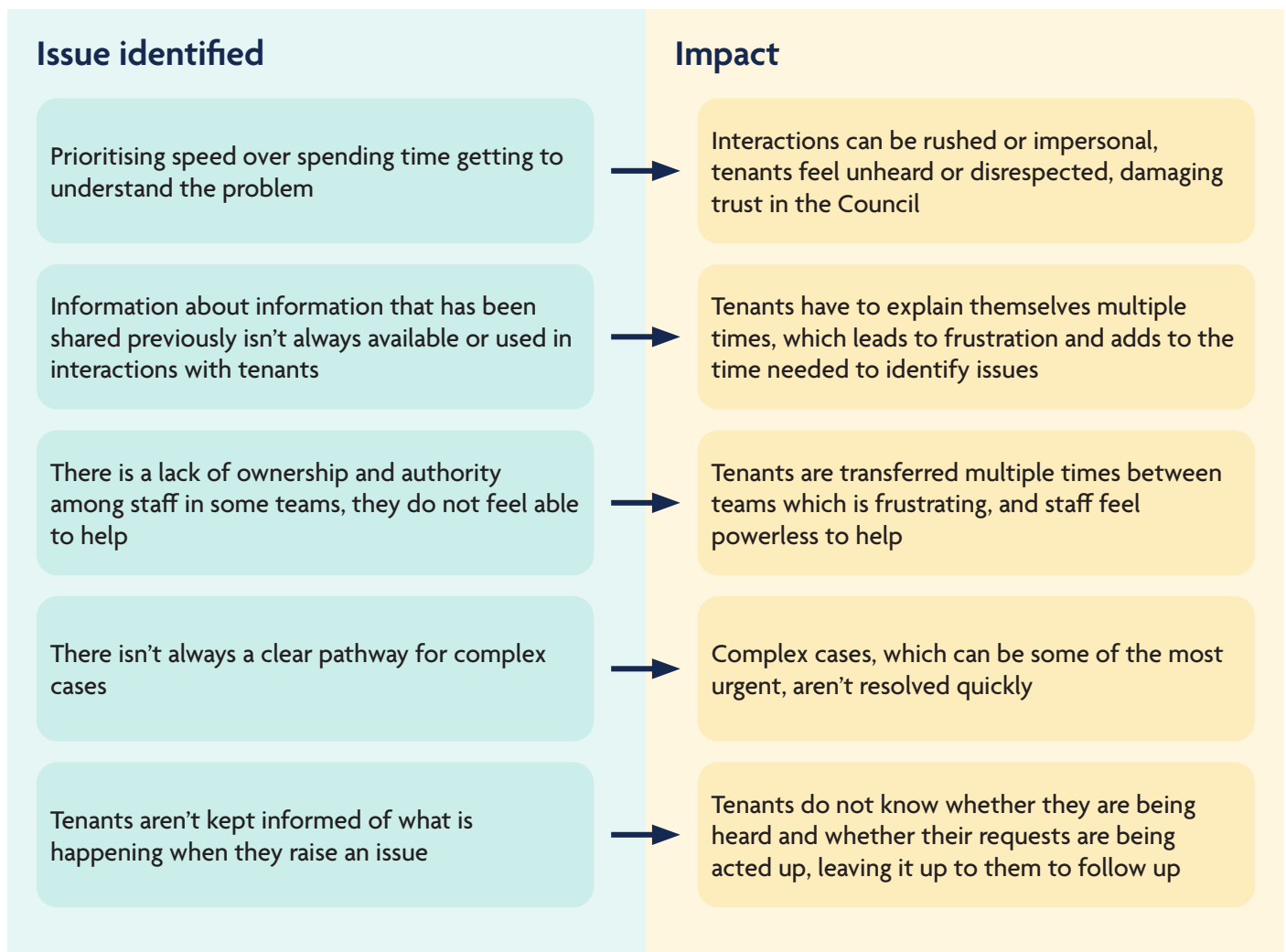
This section sets out the key findings from the research and the key actions we will take in response over the five years of the strategy. Each theme sets out improvements in how we recognise, record, respond to, and review our tenants' diverse needs.

Treating tenants with respect



This theme centres around the quality of the interactions between staff and tenants. We want to create a culture within our housing service where diverse needs are not seen as additional tasks to handle, where staff are well equipped to handle complex situations, able to spend as long as is needed to understand what the problems are, and where tenants are kept informed. We are looking to create a service where there is collaboration between staff and tenants in identifying and adapting our services to tenants' needs.

The following graphic sets out what our research found, and what impact that is having on our tenants and staff.



Actions we will take:

	Activity	Outcome
Recognise	Introduce mandatory training for all staff on how to sensitively speak to tenants about their needs, including the use of a trauma-informed approach.	All staff are well-prepared to sensitively ask the right questions and encourage disclosure from tenants. Staff are consistently sensitive, compassionate and confident when dealing with difficult and complex situations.
	Introduce a standard procedure to follow when there is language barrier.	Tenants who struggle to speak English are consistently able to communicate with the Council.
Record	Introduce procedures and, if required, changes to our databases to record when and where each interaction has taken place and any information shared. This may be supported by the introduction of devices.	We have a record of interactions that we can check if something has gone wrong.
Respond	We will review our key performance indicators across all service areas to remove incentives to rush interactions.	We focus on the quality of the interaction as well as the speed of response.
	Introduce procedures and joint-working protocols for teams to set out how tenants should be informed to acknowledge their contact, and when an issue is escalated to a different team, including timelines.	Tenants are kept informed of actions being taken.
	Information on how to make a complaint will be embedded into communications templates to ensure that it is visible in all written communications.	We have an effective and transparent complaints process to ensure tenants who feel they have not been treated with respect can seek appropriate remedy and redress.
	Introduce service standards across the housing service.	Fair and respectful tenant-officer relationships are embedded into the organisational culture.
	Introduce standard text into job descriptions, contracts and invitations to tender requiring applicants to demonstrate a positive approach to diverse needs.	We set expectations early with staff and contractors and are able to hold them to account.
	We will develop a communications strategy which includes detail on communicating with tenants with diverse needs.	We have a consistent approach to communications with tenants and our approach to adapting our communications for tenants with diverse needs.
Review	Develop procedures for follow-up calls and/or visits for tenants with diverse needs to let them know what is happening or has happened as a result, to ensure that issues have been resolved satisfactorily.	Residents are informed when their reporting or requests is being actioned, and whether their feedback is making a difference.

Identifying and reporting additional needs



This theme is all about how well we notice when someone is facing additional barriers or needs support. This involves staff not only having the skills to notice and sensitively ask questions around someone's needs, but also creating a culture of professional curiosity, having the confidence to trust their own judgement, and having systems and processes in place to ensure that the information is logged.

Issue identified	Impact
A lack of training means that people rely on common sense and experience to identify needs	Staff do not identify some conditions as leading to additional needs, especially less obvious or complex cases, leaving tenants at risk of harm
Procedures and responsibilities for reporting or escalating cases is unclear	Staff do not report some cases or delay reporting even where there is some concern, risk of harm remains or worsens
Screening questions are not used with every contact	Missed opportunities to identify issues
Competing pressures, especially time pressure	Staff feel unable to spend longer speaking with tenants so miss opportunities to identify issues



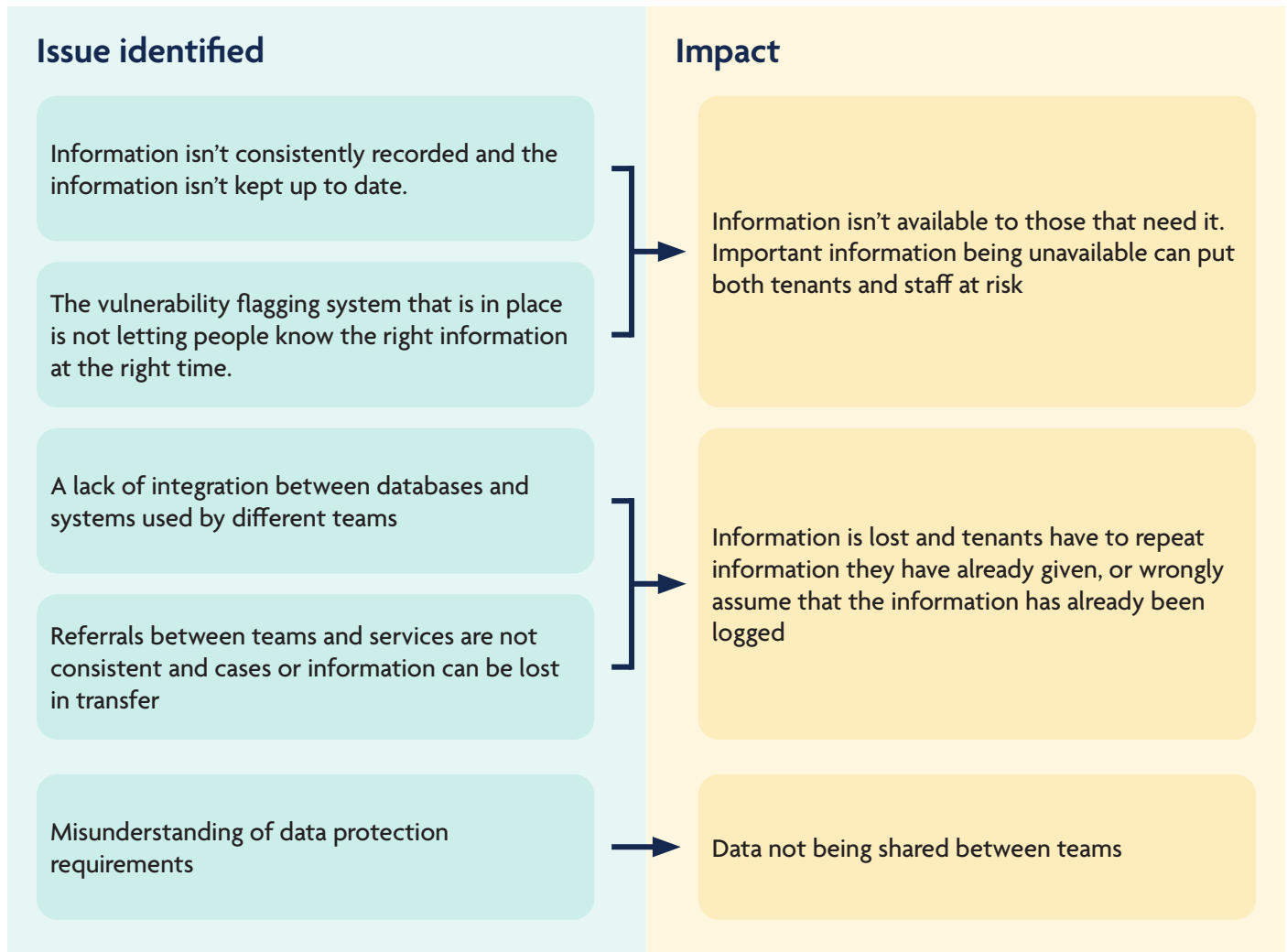
Actions we will take:

	Activity	Outcome
Recognise	Agree a list of recognised diverse needs and train staff to ensure they understand how they can affect a tenant's interactions with the housing service.	There is a shared understanding of diverse needs and the risks associated with a range of needs across the service.
	Develop procedures, scripts and mandatory training for front line staff to sensitively ask about and recognise a range of needs and vulnerabilities.	Staff are equipped to accurately and sensitively identify a range of diverse needs that require additional support.
	Review performance measures to ensure that they aren't discouraging reporting.	Staff exercise professional curiosity and recognise signs when things aren't quite right.
	Develop procedures for logging information about needs where they have been disclosed (outside of the existing tenancy audit and person-centred fire risk assessment processes). This may include the use of portable devices.	Staff consistently log information about diverse needs, preferences and requests for support, including where an advocate is required, on a central system.
Record	Review of case management systems to ensure that a full range of conditions, vulnerabilities, and resulting needs is available.	Systems and processes have been designed to capture an appropriate range of diverse needs.
	Design and introduce reporting mechanism for staff visiting tenants in their homes and train all teams in the housing service on how to use.	There is a mechanism for staff to report when something doesn't look right but they are unsure what the issue is.
Respond	Introduce procedures on how to identify complex cases and escalate them to a manager or specialised team.	Staff make informed decisions about when and how to escalate issues and can explain their decision-making process to tenants.
	Review our approach to making adaptations to properties to ensure that this is fit for purpose.	Tenants are able to access appropriate aids and adaptations to their properties where required.
Review	Introduce procedures for reviewing and updating tenant data when things change, including timelines for following up to confirm.	We regularly review the tenant data that we hold to ensure it is up to date.
	Create a dashboard for demographic data about tenants, including any characteristics covered by the Equality Act 2010, as well as any identified needs.	We proactively use the data to identify people who may be at higher risk of unfair outcomes.

Record-keeping and use of data



This theme focuses on how we log information that we are given, how we keep it up to date, who is able to access the information and how we use it to inform both individual cases and the strategic direction of the service.

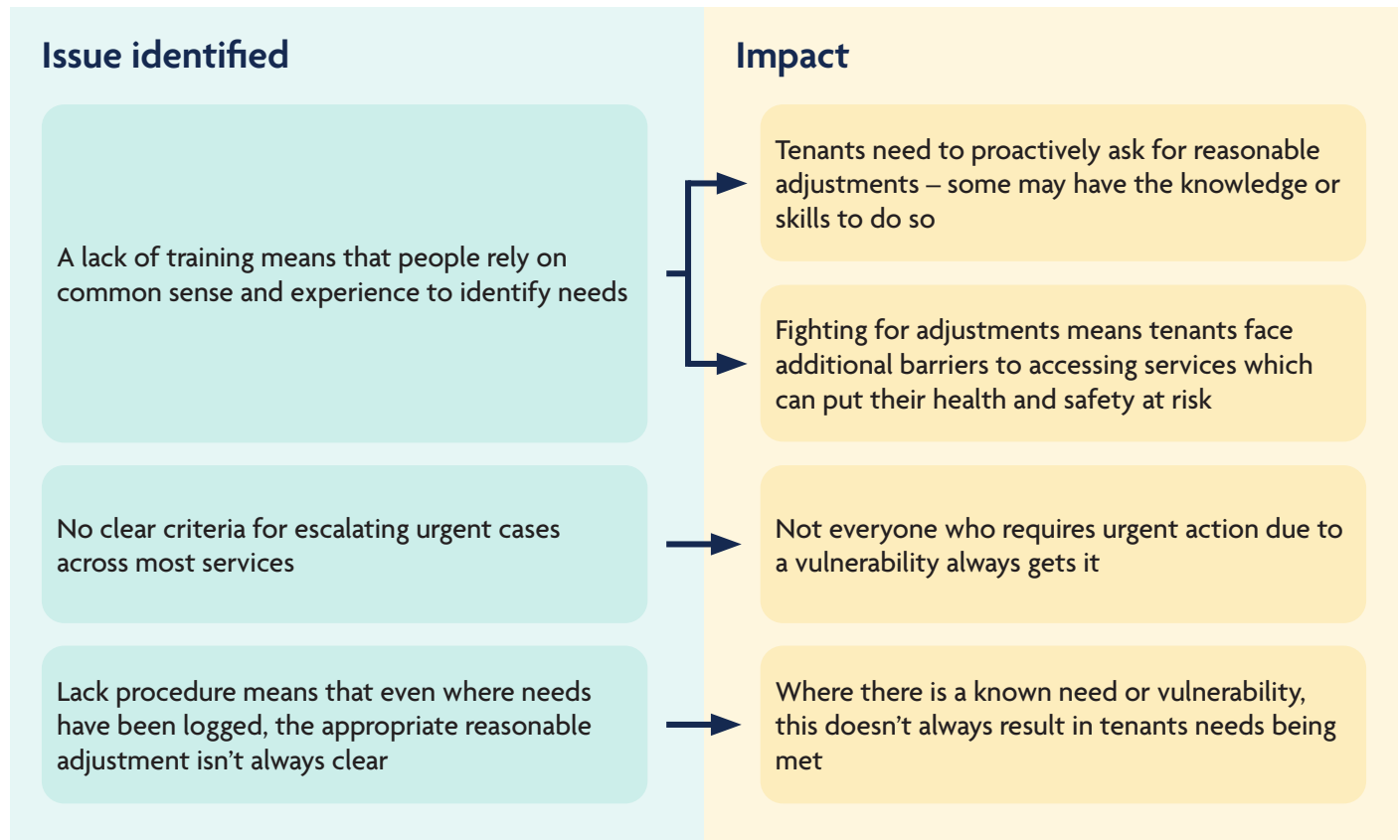


Actions we will take:

	Activity	Outcome
Recognise	Keep the types of reasonable adjustments associated with conditions under review to increase our understanding of how adjustments and conditions are related.	The Council continuously improves its understanding of diverse needs.
Record	Review access for different teams, ensuring that the right information is available to the right teams without compromising privacy.	Data about tenants' needs is available for key teams to access the information they need.
	Introduce a procedure and online reporting mechanism to allow tenants or staff to make requests for adjustments or changes to agreed adjustments.	There are opportunities for tenants and staff to update their information, report concerns or suggest improvements to how their needs are recorded.
	Review the demographic data use n processes in tenant engagement.	We collect useful data on who is participating in resident involvement.
	Review the system to introduce dates when information was last updated.	The Council keeps records of when and how it reviews data so that we know how recent it is.
Respond	Review systems to ensure that information about needs is available to teams scheduling repairs or visits, and a requirement for operatives to acknowledge that they have read and understood information about a household.	Staff are able to access the information they need to respond effectively to communicate with the tenant and action the tenant's service requests.
	Introduce data protection training to ensure that misunderstandings of privacy law don't hinder information sharing.	Information can be easily shared between Council services when this is required for an effective response.
	Introduce referrals procedures and protocols between teams to reduce the sharing of data via email and to ensure that referrals are acknowledged.	When referrals are made, the staff member making the referral knows what is happening as a result.
Review	Introduction of a dashboard on tenant needs to inform the development of strategies.	Data about needs is used to adapt policies, procedures, and services to better meet the changing needs of all tenants.
	Review systems to include prompts and reminders to act within agreed timescales.	Our case-management includes proactive follow-up.
	Introduce data assurance mechanisms to ensure that the data we hold is robust.	We have robust assurance mechanisms in place to ensure that data and reporting is accurate and useable.

Tailoring our services

It is critical that we make reasonable adjustments to ensure we can effectively deliver services to people with diverse needs. This section focuses on how we will go about making adaptations and adjustments to service delivery.



Actions we will take:

	Activity	Outcome
Recognise	Produce procedures to proactively ask about any communications needs.	The Council understands the range of different communication needs of our tenants, including the fact that it might take longer to respond for some tenants.
	Training for staff on awareness of a range of vulnerabilities and their impact on accessing services.	The Council understands that people need to access services in different ways. We design services around the lived experience of tenants with diverse needs.
	Review performance indicators for service delivery teams to include consideration of households where interactions or jobs may take longer due to a household's needs.	The Council recognises the importance for people of having support/advocacy, even if it means going at a slower pace to get the job done.
Record	Produce a procedure for logging and checking existing reasonable adjustments as part of routine interactions with tenants.	We hold data on any agreed reasonable adjustments that are required as a result of needs, whether around communications or more general service delivery. This includes the use of advocates.
Respond	Review how information is shared with operatives before they visit tenants' homes to ensure that they are effectively notifying staff of reasonable adjustments.	Staff who are visiting tenants in their homes can access information about needs and/or any reasonable adjustments, as appropriate.
	Measure how many people with diverse needs are taking part in resident involvement activities, and make sure adaptations can be made where required.	We know that resident engagement activities are accessible for people with diverse needs.
Review	Improve the use of tenant engagement and feedback to drive improvements in how our services adapt to diverse needs.	Tenants are asked for feedback on interactions with officers, communications, and services provided, and this drives improvements.

Turning the Strategy into Action

It is important that we make thorough plans to ensure that the actions set out in this strategy are implemented over the next five years. We have developed an implementation plan for the strategy. This plan:

- Sets out all the actions included in this strategy
- Prioritises them based on urgency and alignment with other pieces of work
- Sets out five workstreams, which will be owned by different parts of the Council's housing and transformation teams

The table below groups out the actions set out in the strategy into key workstreams and includes the estimated year of the strategy that we will be implementing them.

Project	Description	Year of strategy				
		1	2	3	4	5
Training on understanding and identifying diverse needs	The strategy has identified the need for general changes around equality, diversity, trauma-informed support and responding to specific types of needs like neurodiversities.					
Policies and procedures	A number of actions set out in the strategy require a new policy to be agreed, or existing policies to be reviewed and revised where the strategy adopts a new approach. Procedures will set out, step-by-step, the actions each service area will need to take to act in accordance with the policies.					
Business systems processes review	The new processes and ways of working introduced through the policies and procedures will require changes to the functionality of existing software and management systems.					
Joint-working protocols	As well as improving processes within housing service teams, we will also strengthen our approach to data-sharing and joint working between housing teams and other parts of the Council to avoid loss of information.					
Training on new processes	Staff will also need to be trained to use the new processes and workflows developed and set out in this strategy, and how to use any new or changed functionalities of the business systems software.					
Review performance indicators	We will review how key performance indicators (KPIs) are used across the service to ensure they align with the aims of this strategy.					
Quality assurance	We will develop a framework to ensure that we can assess whether processes and procedures are being followed consistently. This will include tenants getting involved to test the quality of service delivery.					
Tenant data assurance and visualisation	We will improve how we visualise our tenant data so that it can be used to drive future improvements. We will also ensure we know how accurate our data is.					

Measuring impact

How will we know if the strategy is working:

- We are progressing through the programme of activities
- New processes and procedures have been thoroughly embedded
- Actions are delivering the intended outcomes for tenants

Governance

Improving how the housing service recognises, records and responds to tenants' diverse needs, and how we keep that information under review is everyone's business. The strategy covers a wide range of services within housing, so heads of service will be responsible for how well their teams are meeting the performance measures in the strategy and will be required to report on performance regularly.

The strategy will be overseen by the Director of Housing and will be reported to the Cabinet Member for Council Housing Improvements. Tenants will be involved in overseeing the progress on the strategy.



