

Medway Council

Vulnerability and Financial Difficulty Policy

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Vulnerability and Financial Difficulty Policy.

1. Purpose

This policy outlines Medway Council's approach to ensuring equitable, supportive and consistent treatment of residents who are experiencing **vulnerability** and/or genuine **financial difficulty**.

At the same time, the policy supports the fair and ethical recovery of public funds by helping residents reduce arrears through sustainable and supportive solutions in line with the government's Debt Management Vulnerability Toolkit.

Recognising vulnerability is essential to this approach, ensuring that additional care and flexibility are provided where needed.

2. Scope

This policy applies to Medway residents who are liable to pay or are in debt with Medway Council and are experiencing vulnerability and/or genuine financial difficulty.

3. Principles of this policy.

The following principles guide how the Council supports residents who are experiencing financial difficulty and / or are vulnerable.

Helping Residents Reduce and Manage Debt

The Council will work proactively to help residents reduce and manage debt due to the Council and where the resident has debt with other organisations, offering practical guidance and providing welfare support where possible.

Understanding and Fair Assessment

All applications will be assessed with empathy, dignity, and respect, ensuring every resident is treated fairly throughout the process.

Commitment to Equality and Fairness

The Council is dedicated to delivering a consistent, inclusive, and non-discriminatory service to residents who disclose a vulnerability or are in debt, upholding equality and fairness at every stage.

Trauma-informed Practice

When using the policy, the Council will adopt the 6 principles of trauma-informed practice, safety, trust, choice, collaboration and cultural consideration using the government's [guidance](#).

Responsible management of Public Funds

The Council will balance support for residents with its duty to manage public resources

responsibly, ensuring provision of fair and practical solutions, balancing this with protecting Council resources.

Data Privacy and Security

Personal and financial information will be handled securely and in full compliance with data protection legislation, ensuring confidentiality.

4. Vulnerability

Vulnerability refers to a condition or situation that places individuals at increased risk of harm, disadvantage, or exclusion. It may result from physical, mental, social, or economic factors that affect a person's ability to cope or access support.

Examples of vulnerability include:

- **Financial vulnerability** – low income, job loss, problem debt, or unstable employment.
- **Health-related vulnerability** – chronic illness, addiction, disability, or mental health conditions.
- **Social vulnerability** – isolation, lack of support networks, or language barriers.
- **Life event vulnerability** – bereavement, domestic or economic abuse, or sudden life changes.
- **Capability related vulnerability** - literacy or numeracy skill barriers, low confidence or knowledge of financial matters and managing money, digital literacy barriers and /or digital exclusion.

Experiencing vulnerability for some may be short-term, for others it can be recurring or permanent. With the support and guidance, individuals can be helped to find ways to manage their circumstances effectively. Providing clear communication, accessible services, and empathetic engagement can help ensure that vulnerability does not lead to exclusion or disadvantage.

Medway Council will:

- **Look for indicators** such as challenging behaviour or difficulty understanding, emotional distress, entering Standard or Mental Health Crisis Breathing Space, mention of health, finances or major life events.
- **Be open, empathetic and invite** residents to disclose their vulnerability and engage in the support they may need, ask if they have anyone that they want involved to support them, and use appropriate communication methods.
- **Respect** the resident, provide guidance, use plain language and interpretation services where appropriate, ensure confidentiality and empower independence.
- **Record** with the residents consent their vulnerability support needs in line with GDPR. Medway Council will record this status on the resident's account with an appropriate alert.

5. Financial Difficulty

Financial difficulty is defined as a **genuine inability to meet financial obligations**, often caused by:

- Illness or disability
- Unemployment or reduced income
- Bereavement
- Relationship breakdown
- Other significant life events

Medway Council will:

- Act in line with the Councils Corporate Debt Policy.
- Maintain up to date records and review these before taking appropriate recovery action.
- Communicate using the resident's requested method of communication, inclusive design in using plain English, provide adjustments required or suggested by the resident under the Equality Act 2010.
- Direct residents to external sources for guidance or advice that cannot be offered by the Council.
- Ensure our contracted partners refer residents to support offered by Council when they find there is genuine financial difficulty or vulnerability.
- Assist residents whose financial concerns relate to Adult Social Care charges by involving the Adult Social Care Debt Team so we can understand their situation and look at the best options together.

6. Types of Support and Assessment

Financial difficulties can affect anyone at any stage for any length of time. The Council can offer a range of support services to help residents manage debt, access essential benefits, and receive expert guidance tailored to their needs.

Financial guidance:

- ✓ Expert support from **Money and Pension Service (MaPS)** trained Money Guiders.
- ✓ **Staged advice** to make the guidance and support more manageable.
- ✓ **Flexible and affordable payment plans** to reduce Council-related debt and prevent worsening financial difficulty.
- ✓ **Temporary payment deferrals** available on a case-by-case basis subject to evidence, duration and compliance with accessing relevant support.
- ✓ **Referrals to regulated debt advice** via the MaPS Money Advisor Network.

Benefit and Welfare **Support**

- ✓ Help accessing **Housing Benefit** and **Universal Credit** (rent support).
- ✓ Support with **Council Tax Reduction** and the **Exceptional Hardship Fund**.
- ✓ Assistance with **Free School Meals** and **school transport**.
- ✓ Access to the **Crisis and Resilience Fund** for emergency financial assistance and support to develop financial welfare.
- ✓ Guidance and emergency help via **Medway's Financial Welfare Hub**.
- ✓ **Discretionary Council Tax Relief** (s13A(1)(c) LGFA 1992) for residents in exceptional financial difficulty (case-by-case basis).

Other support:

- ✓ Access to the Macmillan Welfare Benefits Service for residents affected by cancer.
- ✓ We will provide residents with reasonable adjustments under The Equality Act 2010.

Referral Networks

- ✓ Connection to wider support through the Refer Kent Network and the Joy Platform.

Eligibility for welfare support is determined by the specific type of assistance requested, with each scheme having its own defined criteria and application process. The Council is committed to providing clear, accessible guidance to help applicants identify and access the most appropriate support. Where possible, a single application will be considered across multiple types of support to streamline the process and reduce barriers for residents.

Applicants must provide accurate and complete information, including all relevant supporting evidence (such as income details, medical certificates, or proof of unemployment).

Any changes in personal or financial circumstances must be reported to the Council promptly.

Each application will be assessed individually by the relevant specialist team. Decisions will be based on the applicant's circumstances, supporting evidence, and the specific criteria of the scheme. Schemes may be reviewed periodically to ensure ongoing eligibility.

Applicants must provide accurate information and promptly notify the Council of any material changes to their financial or personal circumstances. The Council will respond in a timely manner, communicate decisions clearly, and explain the reasons for outcomes.

7. Decisions and Outcomes

Types of decisions and outcomes offered:

Support Granted - one or more support measures are approved, such as Welfare Benefit Support and a payment plan to reduce council-related debt.

Partial Support Approved – some, but not all, requested support is granted based on eligibility and assessment.

- A clear explanation and reasons will be provided.
- Residents will be referred to alternative support options.
- Residents will be advised on any available reconsideration or right of appeal.

Conditional Support Provided:

Support is offered subject to specific conditions, which may include maintaining regular payments and providing updated financial information.

Guidance to Additional Services

If further support is needed beyond what the Council can provide, residents will be guided to appropriate external services or agencies.

Application Declined - Where eligibility criteria are not met:

- A clear explanation will be provided.
- Residents will be referred to alternative support options.
- Residents will be advised on any available reconsideration or right of appeal.

Panel Review

If all support avenues have been explored and further decisions are needed, **particularly where serious recovery action is being considered** (For example before Committal applications or Council Tax repossession order applications following an Order for Sale by the County Court), the case will be reviewed by a panel of Senior Officers. This ensures a fair, transparent, and accountable decision-making process before any significant enforcement action is taken. Where the resident is in debt with the council, the panel will make their decision guided by other relevant policies including the Corporate Debt Policy and any further policies relating to the support mentioned in 8. Below.

8. Benefits and Financial Welfare Support Available

Medway Council offers a range of welfare and benefits that can support residents experiencing financial difficulty. Key provisions include:

Benefit / Support	Description	Eligibility
Housing Benefit / Universal Credit Housing Costs	Assistance with rent payments	Low-income tenants (criteria apply)
Council Tax Reduction (CTR)	Reduces Council Tax liability	Low-income households may be topped up with Exceptional Hardship Fund
Exceptional Hardship Fund (Council Tax)	Short-term support for severe financial difficulty	Applicants to CTR or those narrowly missing criteria
Household Support Fund to 31 March 2026 / Crisis	Grants or vouchers for food, energy, uniforms,	Vulnerable households

Benefit / Support	Description	Eligibility
and Resilience Fund from 01 April 2026	and essential items. Additional help with rent	
Free School Meals / Transport	Support with school meal or transport costs	Families meeting benefit-related criteria
Macmillan Welfare Benefits Service	Advice and benefits support for people affected by cancer	Medway residents affected by cancer
Financial Welfare Hub	Advice, emergency help, and benefit entitlement checks	All Medway residents
Other Support	Debt guidance, rent arrears assistance, homelessness prevention	Based on individual circumstances
Discretionary Relief for Council Tax	Temporary reduction or removal of Council Tax liability in cases of exceptional financial difficulty	Residents facing severe financial difficulty who have exhausted other Council Tax support options

9. Collaborative Working.

This policy promotes collaborative joint working to holistically support residents when they are challenged with vulnerability and / or financial difficulty:

Corporate Debt Team

The Benefits and Financial Welfare and Corporate Debt team will work collaboratively to ensure residents receive comprehensive assistance tailored to their circumstances. This includes joint case reviews, sharing information, coordinated communication, two-way referrals, maximising income, and welfare assistance. These actions aim to improve financial well-being and empower residents to take control of their finances.

Housing Team

Housing officers play a vital role in supporting residents at risk of homelessness or struggling with rent arrears. Working together in joint assessments, the Benefit and Financial Welfare and Housing teams will take a preventative approach by providing guidance and early intervention principles. Housing will promptly refer appropriate cases, engage with landlords to prevent eviction and integrate housing advice with debt guidance and welfare support to promote long-term stability for tenants.

The goal is to ensure residents receive coordinated support that improves financial well-being and helps them maintain secure housing.

Adult Social Care

Adult Social Care approaches debt in a way that recognises vulnerability, supports wellbeing, and reflects its responsibilities under the Care Act. To help achieve this, the Adult Social Care Debt Team will work closely with the Corporate Debt Team to coordinate activity, share relevant information appropriately, and identify residents who may need additional support. This collaborative approach encourages early intervention, reduces duplication, and helps ensure debt recovery is fair, consistent and sensitive to individual circumstances.

Partnership with the Money and Pensions Service (MaPS)

Medway Council works in partnership with the Money and Pensions Service to improve financial well-being and resilience for residents.

This partnership includes:

- **Money Guiders Training Programme** – equipping all relevant staff with the skills and confidence to deliver a consistent, corporate approach to money guidance.
- Referrals to the **Money Adviser Network** – access to free, regulated debt advice.
- Integration of **MaPS tools and resources** into Council services to strengthen support.
- **Joint initiatives** to promote financial well-being and empower residents to manage their finances confidently.

10. Decision Making Tools and Resources

To ensure fair, consistent, and informed decisions, the Council will use a range of tools and resources, including:

- **Affordability Assessments** – to understand a resident's financial position and ability to pay using Income and Expenditure statements.
- **Data Analytic tools** - such as the LIFT (Low Income Family Tracker) platform, to identify financially vulnerable households. Early identification and intervention to enable income maximisation, proactive arrears reduction, direct Household Support Fund / Crisis Resilience Fund campaign targeting. Credit Reference Agency data to assess affordability and to identify financial vulnerability for direct contact with residents not able to pay priority bills.
- **Income Maximisation Checks** – to ensure residents are receiving all benefits and entitlements. Entitled to.
- **Debt Advice Referrals** – connecting residents with free, regulated advice services.
- **Messaging campaigns** – sending text, email and letter communication inviting vulnerability disclosure and engagement for residents identified through the available tools mentioned above to come forward to obtain support.

11. Confidentiality and Data Protection

Personal information collected under this policy will be processed and stored securely and used only for the purposes of assessing and administering support, in accordance with data protection legislation.

12. Monitoring and Policy Review

This policy will be reviewed every **two years**, or earlier if required by legislative changes or Council direction. Monitoring will focus on fairness, consistency, and effective use of public funds.

13. Document Control

Version History	Date	Change description	Changed by

APPROVED BY:

Name	Title	Version	Signature
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