

# Corporate Policies & Procedures



## Vulnerable Customers Policy

1.	Policy Objective
1.1	<p>We recognise that some of the people we house will have a degree of vulnerability that may impact how they are able to manage their tenancy or engage in the community. We also recognise that a customer can <i>become</i> vulnerable over the course of their tenancy. This Policy sets out the general approach we will take in these circumstances.</p>
1.2	<p>Vulnerability can be a changing state and can occur at different points in a person's life. It can be temporary, periodic or recurring as well as ongoing and developing over time. There are a number of indicators that someone may be vulnerable or in need of individual support. In a housing context these could be various factors, which are set out in Appendix A.</p>
1.3	<p>The aim of this Policy is to ensure that all customers have equal access to services and that we identify, understand and respond to our customers' particular needs in providing services and communicating with vulnerable customers. Making flexible housing and support services available where we can, to sustain tenancies and avoid giving rise to disadvantage.</p>
1.4	<p>Where there is a risk of harm or concern regarding the welfare of adults who are experiencing, or are at risk from, abuse or neglect we will follow our safeguarding policies and procedures</p>
1.5	<p><b>Aims and Objectives</b></p> <p>The Housing Service aims to ensure that everyone has the opportunity to access and benefit from its services but realises that for some service users who are vulnerable, barriers may exist which may prevent participation. The objectives of the Vulnerable Customers Policy are to set out:</p> <ul style="list-style-type: none"> <li>• How vulnerable adults are identified and recorded</li> <li>• How vulnerable adults can access the Housing Service</li> <li>• How the Housing Service has adapted to meet the needs of vulnerable adults</li> <li>• The safeguards which are in place to protect vulnerable adults</li> <li>• How Housing Services staff will signpost and refer vulnerable adults to other organisations, when they require additional support.</li> </ul>
2.	Legislative & regulatory requirements

2.1	<b>Legislation:</b>
2.1.1	<u>Data Protection Act 2018 and UK General Data Protection Regulation (GDPR) (Together taken as Data Protection Law)</u> : sets out a range of obligations on us as a 'data controller' in safeguarding rights to privacy and security of personal information. In the context of this Policy the key elements relate to keeping information about the vulnerabilities of our customers and their household members appropriately secure as well as sharing information appropriately. The Data Protection, Data Sharing and Data Processors Policies & Procedures contain further guidance in these areas.
2.1.2	<u>Equality Act 2010</u> : places a statutory duty upon service providers to ensure that people with "protected characteristics" (as defined under the Act) are not unlawfully discriminated against and that they have equal access to services. Customers with such "protected characteristics" are deemed to be vulnerable under this Policy.
2.1.3	<u>Care Act 2014 &amp; Safeguarding Vulnerable Groups Act 2006</u> (as amended by the Protection of Freedoms Act 2012): places a statutory duty on housing providers to act on concerns that children or adults may be at risk of abuse or neglect (see Safeguarding Policy & Procedure). We recognise that vulnerability and the risk of abuse are connected; customers who are vulnerable will therefore often meet the statutory definition of an 'adult at risk' and therefore require the application of the Safeguarding Children & Adults At Risk Policy and Procedure and the Safeguarding Vulnerable Groups Act 2006.
2.1.4	<u>Mental Capacity Act 2005</u>  Customers who lack the mental capacity to make some/all decisions by themselves are deemed to be vulnerable under this Policy. See Appendix A for further guidance in this area as well as Appendix B for our Mental Capacity Assessment Form.
2.2	<b>Regulatory Standards:</b>  The Regulator of Social Housing's Regulatory Standards set out several duties for registered housing providers in understanding and responding to customers' needs in the provision of our services which will have particular application to our vulnerable customers.
2.2.1	<b>Tenant Involvement &amp; Empowerment Standard (2017)</b> <i>1.1 Customer service, choice and complaints</i> 1.1.1 Registered providers shall: a. provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards.  <i>1.3 Understanding and responding to the diverse needs of tenants</i> 1.3.1 Registered providers shall: a. treat all tenants with fairness and respect; b. demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.  2.3.1 Registered providers shall demonstrate how they respond to tenants' needs in the way they provide services and communicate with tenants.
2.2.2	<b>Tenancy Standard (2015)</b>

	<p><i>Tenure</i></p> <p>Registered providers shall offer tenancies or terms of occupation which are compatible with the purpose of the accommodation, the needs of individual households, the sustainability of the community and the efficient use of their housing stock.</p> <p>(g) Their Policy on taking into account the needs of those households who are vulnerable by reason of age, disability or illness, and households with children, including through the provision of tenancies which provide a reasonable degree of stability.</p> <p>(i) Their policy on granting discretionary succession rights, taking account of the needs of vulnerable household members.</p>
<b>3.</b>	<b>Scope and definitions</b>
3.1	<b>Scope</b>
3.1.1	The purpose of this Policy is to outline our approach to identifying customers who are vulnerable and our response across a range of services. We endeavour to ensure equal access to our services. The details of how we do this are set out within our relevant service policies and our service offer is summarised in Appendix C. In reviewing relevant service policies, we will consider the likely impact on customer groups based on current demographics data.
3.1.2	This Policy applies to the WCH Group, including its subsidiary and joint venture companies. It affects our customers and members of their household. It excludes shared owners, market rent tenants and leaseholders.
3.2	<b>Definitions</b>
3.2.1	<b>'Vulnerable'</b> : we define vulnerability based on the definition used by the Department for Work & Pensions as follows: <i>"An individual who is identified as having complex needs and requires additional support to enable them to access and use services and/or sustain their tenancy"</i> . The guidance in Appendix A provides helpful indicators for recognising a person's vulnerability in practice.
3.2.2	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 customers who may require a tailored or enhanced housing service (such as extra visits or correspondence in braille) or who require signposting or referring to other services.
<b>4.</b>	<b>Access to Housing</b>
4.1	We are committed to providing homes in sustainable communities that are appropriate to the needs of our customers in accordance with the RSH Tenancy Standard. Our published Access to Housing and Tenancy policies outline our fair and transparent approach to lettings as well as how we take the needs of customers and applicants into account.
4.2	<b>Staff Training</b>
4.2.1	Providing good quality support for our vulnerable customers requires staff to be trained. We will ensure our staff receive a full induction, vocational training and refreshers to keep up to date with best practice. We also offer a range of mandatory e-learning courses.
4.3	We have nominated safeguarding champions within the team. These colleagues are also able to provide advice and guidance within the team surrounding vulnerability

	<p>Customer Review Performance feeds into the Vulnerable customer Policy and Housing officers are expected to complete regular customer reviews. These reviews are scheduled based on the vulnerability dashboard 'risk rating' report so we can reach out to our most vulnerable customers.</p>
4.3.1	<p>The Housing Service will also be introducing a new set of Tenant Satisfaction Measures as part of its performance monitoring framework under the proposed new regulatory regime set out in the Government's Charter for Social Housing Residents (White Paper). This will be to ensure that an accessible service is provided for vulnerable customers and will include TSM's for complaints by vulnerable customer's and surveys following case closures.</p>
4.3.2	<p>Where there are concerns for the welfare of the customer this will be monitored via the Concerns and Safeguarding Procedure.</p>
4.3.3	<p>Officers:</p> <ul style="list-style-type: none"> <li>• Staff are expected to maintain professional standards in accordance with policy and relevant service standards. Staff should be helpful and respond to the needs and problems of residents empathetically and sensitively.</li> <li>• All Officers will read and comply with Vulnerable Customers Policy</li> <li>• Officers shall record and update information on all actions taken on our Housing Management System. This should also include logging any concerns via the safeguarding procedure.</li> <li>• Officers should signpost and direct vulnerable customers to relevant agencies</li> <li>• Staff are expected to attend all training around Vulnerability</li> <li>• Identifying vulnerability is 'everyone's business'. Staff to adapt 'see something, say something, do something' approach.</li> <li>• Officers shall use best endeavours to meet corporate targets surrounding the completion of customer reviews.</li> </ul>
4.3.4	<p><u>Line Managers (AHMs, Senior Independent Living Officer, Senior TA Officer):</u> The line managers are responsible for ensuring:</p> <ul style="list-style-type: none"> <li>• officers appropriately support vulnerable customers and make referrals to support services where required</li> <li>• Customer Reviews are completed</li> </ul>
4.3.5	<p><u>The Housing Operations / Supported Housing Manager will review:</u></p> <ul style="list-style-type: none"> <li>• How vulnerable adults are identified and ensure this is recorded</li> <li>• How vulnerable adults can access the Housing Service</li> <li>• How the Housing Service has adapted to meet the needs of vulnerable adults</li> <li>• The safeguards which are in place to protect vulnerable adults</li> </ul> <p>Manage the implementation of the Strategy and related policies and procedures on a day-to-day basis, and to update EMT, other managers and all employees as required on specific matters.</p> <ul style="list-style-type: none"> <li>• To ensure relevant employees have the necessary skills and knowledge to recognise when support or assistance is required and to know how best that may be provided.</li> </ul>

	The Housing Operations / Supported Housing Manager shall use best endeavours to meet all established targets for Customer Reviews specified by the Executive Management Team and produce periodic performance information as required.
<b>5.</b>	<b>Communication</b>
5.1	We will advertise and communicate about our services using a variety of platforms to engage with our customers in a way which meets their needs. This includes via social media, our website, signage screens, online survey, email/text and more traditional methods including hard copy, print and letters.
5.2	We will provide translations, interpreters, signers, Braille or large print documents to meet identified needs as appropriate in line with our Translation and Interpretation Policy. We also recognise the role of carers, advocates and personal representatives and where appropriate, shall take their views into account when consulting vulnerable customers on issues which affect them.
5.3	We ensure that our website is as accessible and user-friendly as possible; the website meets the Web Content Accessibility Guidelines AA Standard. Our accessibility features include the ability to change the language displayed, a full site map and support for multiple web browsers and mobile platforms.
<b>6.</b>	<b>Service Offer to Vulnerable Customers</b>
6.1	Where we have identified issues of vulnerability (using the guidance at Appendix A) and where we can, we will provide services which are sensitive to and responsive to their needs and circumstances to enable them to fully access our services and sustain their tenancy.
6.2	Where appropriate, we will ensure staff working with vulnerable customers are trained to comply with best practice including by having recent DBS checks and that, where staff themselves may be placed in situations of vulnerability, they are appropriately trained, supported and managed.
6.3	Where we do not have expertise relating to a particular customer group, we will work with suitable partner organisations to ensure that appropriate support is made available e.g. Age UK, Probationary and Youth Offending teams, Leaving Care Teams,
6.4	The details of how we will respond to the vulnerability of different customer groups is set out below. Appendix C also provides examples of where this is practically applied across our services.
6.5	We will: <ul style="list-style-type: none"> <li>• Ensure equal access to services and make reasonable adjustments for those with protected characteristics under the 2010 Equality Act; see also our Diversity and Inclusion Action Plan;</li> <li>• Ensure any vulnerability is captured for new tenants at sign up and also following customer reviews</li> <li>• Recognise that anti-social behaviour or harassment may be directed towards a vulnerable individual or household because of prejudices held by a perpetrator</li> <li>• We also recognise that a vulnerable person may be less able to cope with what may traditionally be regarded as low-level harassment or anti-social behaviour. We will be alerted to repeat incidents of such behaviour and will not underestimate its potential impact on vulnerable people;</li> </ul>

6.6	<ul style="list-style-type: none"> <li>• Report any safeguarding concerns for adults at risk or children (i.e. domestic abuse, severe mental ill-health, physical, emotional or financial abuse) to the relevant local authority in accordance with the Safeguarding Children and Adults at Risk and Domestic Abuse policies;</li> <li>• Exercise discretion when making tenancy management decisions e.g. granting a tenancy, taking rent arrears/possession action, effecting management transfers, approaching hoarding, applying recharges and supporting victims of anti-social behaviour – see also the Housing Panel Guidance Notes;</li> <li>• Support vulnerable customers to sustain their tenancy by sign-posting and accessing support services with relevant local partners (Community Navigators, Thriving Families Worker, Mental Health Worker, Domestic Abuse Support Worker, and Citizens Advice Bureaux);</li> <li>• Prioritise repairs according to their urgency and customers' particular needs or vulnerabilities in accordance with the Responsive Repairs Policy and make arrangements for additional support to be in place where required;</li> <li>• Where practical, make provision for the requirements of vulnerable customers in new developments, such as appropriate size and space standards, access and safety, appropriate fixtures and fittings, and support requirements;</li> <li>• Provide support through Financial Inclusion Officers to enable customers to remain in their homes as long and as debt free as possible;</li> <li>• Support adaptations to a property to accommodate a customer's disability / need or that of one of their dependents in accordance with the Aids and Adaptations Policy;</li> <li>• Provide a variety of tenures and flexible housing options that meet customers' needs as their vulnerabilities change in accordance with our Access to Housing and Tenancy policy; and</li> <li>• Work with existing agencies such as New Hope, One YMCA and Hertfordshire County Council when new customers are referred to us from leaving care / supported housing.</li> </ul> <p><b>We do <u>not</u></b> provide the following care / support: -</p> <ul style="list-style-type: none"> <li>• Personal care i.e.: cleaning, washing, feeding and bathing;</li> <li>• Offer the type of support you would get from the Citizens Advice Bureaux;</li> <li>• Advocacy;</li> <li>• The administration of medication;</li> <li>• Transportation of customers in personal vehicles;</li> <li>• Communicate on behalf of a customer(s) where there is a lack of capacity; and</li> <li>• Making decisions on behalf of a customer(s). We will signpost or refer to other services who can provide this e.g.: PoWher, Hertfordshire County Council.</li> </ul>
<b>7.</b>	<b>General Diversity and Inclusion Considerations</b>
7.1	We will act fairly and consistently in the application of this Policy and the service policies summarised at Appendix C and shall not discriminate against any person on the grounds of their age, race, ethnicity/nationality, gender, religion, sexual orientation, marital/civil partnership status, pregnancy status or disability.
<b>8.</b>	<b>Monitoring the Effectiveness of this policy</b>
8.1	This Policy will be monitored through quarterly reporting of all safeguarding referrals made and numbers of active anti-social behaviour cases. The Assistant Director of Housing and the Housing Operations Manager will carry out monthly internal safeguarding case reviews to assess any training needs among staff and lessons learned for future case-handling.

8.2	<p>Our success in achieving our objectives under this Policy will be measured in the following ways:</p> <ul style="list-style-type: none"><li>• Analysis of concerns reported (including numbers, actions taken and outcomes).</li><li>• A reduction in the number of evictions, abandonments or otherwise failed or failing tenancies involving a vulnerable person or household.</li><li>• A reduction in the number of cases of anti-social behaviour or harassment involving a vulnerable person (either as victim or perpetrator).</li><li>• No complaints based on a failure to support vulnerable tenants. This will be reviewed in our monthly complaints meetings</li><li>• An increase in customer satisfaction amongst vulnerable residents, (e.g. via feedback on where we have provided support)</li><li>• Improved outcomes for residents following involvement of internal or external support services.</li><li>• An increase in the number of vulnerable residents becoming involved in our activities.</li><li>• Utilise Vulnerability dashboard to identify households to complete customer reviews</li><li>• Vulnerability recorded at sign ups and following any visits completed by Housing Officer</li><li>• Quarterly meetings with the community safety partnership with a focus on improving our processes for our most vulnerable customers.</li></ul> <p>The Group Director of Customer Services, as the Executive Safeguarding Champion will consider any necessary changes or improvements to the Policy accordingly.</p>
<b>9.</b>	<b>Related documents</b>
	<ul style="list-style-type: none"><li>• Access to Housing Policy and Procedure</li><li>• Aids &amp; Adaptations Policy</li><li>• Diversity &amp; Inclusion Action Plan</li><li>• Safeguarding Children &amp; Adults at Risk Policy &amp; Procedure</li><li>• Data Protection Policy</li><li>• Data Processors Policy &amp; Procedure</li><li>• Data Sharing Policy &amp; Procedure</li><li>• Person UDC Policy &amp; Procedure</li><li>• Hoarding Policy &amp; Procedure</li><li>• Domestic Abuse Policy and Procedure</li><li>• Harassment and Hate Crime Policy and Procedure</li><li>• Housing Panel Guidance Notes</li><li>• Mental Capacity Act 2005 Code of Practice</li><li>• Translation and Interpretation Policy</li></ul>
<b>10.</b>	<b>Appendices</b>
	Appendix A – Guidance on Assessing Vulnerability Appendix B - Multi-agency Mental Capacity Assessment Form Appendix C – Vulnerability Service Offer
<b>11.</b>	<b>Approval</b>
	Approved by : GMT EMT 7 <sup>th</sup> December
	Approval date : December 2022
	Review date : March 2025

	Policy owner : Housing Operations Manager
--	---