

Corporate Policies & Procedures



Vulnerable Customers Policy

1.	Policy Objective
1.1	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 with WCH. This Policy sets out the general approach we will take in these circumstances.
1.2	Vulnerability can be a variable 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.
1.3	The aim of this Policy is to ensure that all customers have equal access to Watford Community Housing (WCH) 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.
2.	Legislative & regulatory requirements
2.1	Legislation:
2.1.1	<u>Data Protection Act 2018</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 & 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

2.1.4	Children & Adults At Risk Policy and Procedure and the Safeguarding Vulnerable Groups Act 2006.
	<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	Regulatory Standards :
	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	Tenant Involvement & Empowerment Standard (2017) <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	Tenancy Standard (2015) <i>Tenure</i> 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. (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. (i) Their policy on granting discretionary succession rights, taking account of the needs of vulnerable household members.
3.	Scope and definitions
3.1	Scope
3.1.1	The purpose of this Policy is to outline WCH's 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 at 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 customers of WCH and members of their household. It excludes shared owners, market rent tenants and leaseholders.
3.2	Definitions

3.2.1	‘Vulnerable’: we define vulnerability based on the definition used by the Department for Work & Pensions as follows: “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”. The guidance at Appendix A provides helpful indicators for recognising a person’s vulnerability in practice.
4.	Access to Housing
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.
5.	Communication
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. 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.
6.	Service Offer to Vulnerable Customers
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 eg 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	WCH will: <ul style="list-style-type: none"> • Ensure equal access to services and make reasonable adjustments for those with protected characteristics under the 2010 Equality Act; see also the WCH Diversity and Inclusion Action Plan;

6.6	<ul style="list-style-type: none"> • 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; • 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; • 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); • Prioritise repairs according to their urgency and customers' particular needs or vulnerabilities in accordance with the Responsive Repairs Policy; • 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; • Provide support through Tenancy Support Officers to enable customers to remain in their homes as long and as debt free as possible; • 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; • 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 • Work with existing agencies such as New Hope, YMCA and Hertfordshire County Council when new customers are referred to us from leaving care / supported housing. <p>WCH does not provide the following care / support:-</p> <ul style="list-style-type: none"> • Personal care i.e.: cleaning, washing, feeding and bathing • Offer the type of support you would get from the Citizens Advice Bureaux • Advocacy • The administration of medication • Transportation of customers in personal vehicles • Communicate on behalf of a customer(s) where there is a lack of capacity • 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.
7.	General Diversity and Inclusion Considerations
7.1	WCH 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.
8.	Monitoring & reporting
8.1	This Policy will be monitored through quarterly EMT reporting of all safeguarding referrals made and numbers of active anti-social behaviour cases. The Head of Customer Relationships and Neighbourhood Services Manager carry out monthly internal safeguarding case reviews to assess any training needs among staff and lessons learned for future case-handling.

8.2	The Director of Operations, as the Executive Safeguarding Champion will consider any necessary changes or improvements to the Policy accordingly.
9.	Related documents
	<ul style="list-style-type: none"> • Access to Housing Policy and Tenancy Policy • Aids & Adaptations Policy • Diversity & Inclusion Action Plan • Transfer Incentive Scheme Policy • Safeguarding Children & Adults at Risk Policy & Procedure • Data Protection Policy • Data Processors Policy & Procedure • Data Sharing Policy & Procedure • Person UDC Policy & Procedure • Hoarding Policy & Procedure • Domestic Abuse Policy and Procedure • Harassment and Hate Crime Policy and Procedure • Housing Panel Guidance Notes • Mental Capacity Act 2005 Code of Practice
10.	Appendices
	Appendix A – Guidance on Assessing Vulnerability Appendix B - Multiagency Mental Capacity Assessment Form Appendix C – WCH Vulnerability Service Offer
11.	Approval
	Approved by : GMT 22 Jan 2020 : EMT 12 Mar 2020
	Approval date : Mar 2020
	Review date : Mar 2022
	Policy owner : Neighbourhood Services Manager