



Housing Services Vulnerable Customer Policy

Last updated February 2024

Vulnerable Customer Policy

INTRODUCTION:

This Vulnerable Customers Policy sets out the commitment of RHP to support and protect vulnerable individuals (including household members) using our services. This policy outlines how we will help address issues such as anti-social behaviour, and tailor our repairs service to meet the specific needs of vulnerable customers. We have a legal and regulatory duty to make adjustments under the Equality 2010 Act and this includes how we use special categories data. We have a separate Special Categories Processing Policy.

We understand our responsibility to uphold the principles of equality, diversity, and inclusion in

all aspects of its operations. We aim to ensure that everyone can access and benefit from our services but realise that for some people who are vulnerable or require service adjustments, barriers may exist which may prevent participation.

Defining Vulnerability

We do not want to specifically define vulnerability and prefer to set out guiding principles. For us it includes customers,

- ▶ who may have experiences with a unique life event and/or
- ▶ who may have particular characteristics or service adjustments who are currently unable to act independently and/or
- ▶ unable to effectively manage their tenancy without additional support.

It can also be where you need care and or support to complete customer/ landlord activities.

We will always be guided by legislation and regulation in defining vulnerability however we want to take a broader and more agile approach that incorporates inclusion by design. This approach ensures that no customer can be left behind and/or forgotten. This flexibility supported through ongoing training for customer service teams will enable us to assist a broader group of customers with vulnerabilities and or specific service adjustments.

The criteria we use is set out below.

Criteria for Identifying Vulnerable Customers:

- ▶ **Physical Disabilities:** If you have physical disabilities that may affect your mobility, sensory functions, or ability to carry out daily activities independently.

- ▶ **Mental Health Conditions:** If you have mental health conditions that may impact your ability to manage your housing needs, maintain a tenancy, or seek appropriate support. This includes but is not limited to severe anxiety, depression, schizophrenia, bipolar disorder, or other psychiatric conditions.
- ▶ **Learning Difficulties:** Learning difficulties or intellectual disabilities that affect your capacity to understand housing processes, communicate effectively, or make informed decisions.
- ▶ **Older Customers:** If you are over 80 years old living alone or experiencing physical or cognitive decline due to age that interferes with your ability to manage your housing needs independently.
- ▶ **Younger Customers:** Where under 18 and there is a guarantor to support you when granted a tenancy.
- ▶ **Domestic Abuse:** If you have experienced domestic abuse (or continue to), including physical, emotional, or financial abuse.
- ▶ **Homelessness or at Risk of Homelessness:** If you are homeless or at risk of homelessness due to factors such as eviction, loss of accommodation, financial difficulties, or relationship breakdowns.
- ▶ **Substance Misuse or Addiction:** If you are struggling with substance misuse or addiction issues, which impact your ability to maintain stable housing or access appropriate support.
- ▶ **Refugee or Asylum Seekers:** If you are refugees or asylum seekers, often facing displacement, language barriers, or limited access to resources.
- ▶ **Other Complex Needs:** If you have needs, which significantly impact your ability to access and maintain suitable housing.

It is important to note that each case would be assessed on an individual basis, considering it's specific circumstances and support needs.

Collaboration with local authorities, support agencies, and relevant professionals is crucial in identifying and supporting vulnerable customers accessing housing.

You may be vulnerable because of a single problem or condition, or due to a combination of factors. Vulnerabilities can also occur at different points in your life, for instance you may need support following bereavement for a temporary period, whereas someone else may require support permanently.

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This Policy does not assume that whole groups of people are vulnerable. For example, it is not correct to assume that all older people are vulnerable or that all disabled people are vulnerable.

Access to Services

Identification: We will proactively identify vulnerable customers who may require additional support to access our services. This includes but is not limited to if you have physical or mental disabilities, elderly, have learning difficulties, if you are a victim of domestic abuse, and those with other complex needs.

Communication and Information: We will ensure that information about our services is accessible and available in different formats, languages, and mediums to cater to diverse needs. Reasonable adjustments will be made to facilitate effective communication with you.

Support Networks: We will collaborate with local support agencies, social services, and other relevant organizations to establish effective networks and referral pathways for vulnerable customers who require specialised assistance.

Tackling Anti-Social Behaviour:

Reporting and Investigation: All reports of anti-social behaviour will be taken seriously and investigated promptly, ensuring the safety and well-being of all parties involved.

Supportive Approach: If you are vulnerable and involved in anti-social behaviour, RHP will adopt

a tailored and supportive approach. This includes considering underlying causes, assessing any support needs, making referrals where appropriate and providing appropriate interventions.

Collaboration and Partnership: We will collaborate with relevant agencies, such as local authorities, police, and support services, to ensure the best possible response to incidents of anti-social behaviour.

Safeguarding: We will adhere to safeguarding procedures to protect you from harm, ensuring that appropriate measures are taken to address any potential risks or vulnerabilities.

We recognise that vulnerable people may not only be the victims but also the perpetrators of ASB and that early intervention is a priority.

The Housing Team and Customer Support Team will work in partnership with a range of different organisations (such as the Police, Social Services, Education, and the Council's Community Safety Unit) to resolve your problem.

If you are at risk of violence, the Housing Service Team may enhance the security of property locks, doors, windows etc. They may arrange management transfers and provide further support and reassurance including additional contact via visits and telephone calls. Housing Advisors will always consider alternative methods to resolve ASB such as anti-social behaviour agreements and referral to support agencies, only taking court action to end a tenancy as a last resort.

Repairs Service:

Needs Assessment: We will conduct individual risk assessments to identify the specific repair and maintenance needs of if you are identified as vulnerable. This may involve engaging with support workers, occupational therapists, or other relevant professionals.

Priority Repairs: Priority will be given to repairs required for the health, safety, and well-being of you. Urgent repairs will be addressed promptly, minimising any potential risks or hazards.

Adaptations and Modifications: We will explore and implement appropriate adaptations or modifications to properties, where necessary, to accommodate the needs of vulnerable customers, ensuring you can live safely and independently. We work with Occupational Therapist to make a home suitable for a disabled customer through the installation of suitable adaptations.

Communication: We will adjust our communication style to suit your vulnerabilities once we have been made aware of how best to do so by you.

We aim to prioritise non-emergency repairs for elderly and vulnerable customers wherever possible (for example, priority heating and hot water appointments) where the nature of the repair could risk the health or wellbeing of you or your household.

When carrying out major works, the contractor's Resident Liaison Officer will meet with you, taking into account your needs and will provide a bespoke service which may include moving furniture, emptying cupboards etc.

If a RHP Home or gas servicing contractor has concerns that you may require extra support or there are safeguarding concerns, they will complete a card and it will be returned to the CSC Team to action.

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RHP Retirement Housing

We have 18 retirement schemes for those 55 plus and or who have housing issues and may require additional assistance with daily living tasks. Each resident has their own flat, with kitchen and bathroom facilities. There are also communal lounges, guest rooms, laundries and gardens at these schemes. The schemes are managed through our Retirement Housing service team.

Retirement scheme managers are available to provide an enhanced housing management service to you, this includes:

- ▶ The provision of an emergency alarm system with 24 hour monitoring
- ▶ Help in maintaining independence
- ▶ Advice on benefit claims
- ▶ Advice on getting repairs done
- ▶ Pursuing rent arrears
- ▶ Resolve low level anti-social behaviour issues

Rent arrears

If you are vulnerable and in rent arrears, extra visits by the Rents Advisor may be organised. We may apply for Alternative Payment Arrangements for you if you cannot manage your single monthly payment when you are claiming Universal Credit.

HOUSING MANAGEMENT

The Housing Management Team manage our social rented accommodation. The team resolve anti-social behaviour and ensure that neighbourhoods are safe and socially inclusive spaces. The team also manage RHP's own Traveller site.

Legal action

Every attempt will be made to avoid legal action in the first place. If court action is taken against you and you are vulnerable because of ASB or a breach in tenancy conditions other than for rent

arrears a Disability Discrimination Assessment will be carried out prior to the hearing to ensure that we are not acting in a discriminatory way.

Under the Pre Action Protocol for Possession Claims by Social Landlords, if we are aware that you are particularly vulnerable, we will consider at an early stage:

- ▶ Whether or not you have the mental capacity to defend possession proceedings and the extent to which Part 21 of the Civil Procedure Rules applies (children and protected parties)
- ▶ Whether or not any issues arise under the Equality Act 2010
- ▶ Whether or not there is a need for a community care assessment in accordance with the Care Act 2014

HOW VULNERABLE CUSTOMERS ARE SUPPORTED

Mental capacity

The Mental Capacity Act 2005 (the Act) provides the legal framework for acting and making decisions

on behalf of people (aged 16 or over) who lack the mental capacity to make particular decisions for themselves.

Where it is identified that you do not have the mental capacity to make decisions for yourself, the Housing Service team will work with carers, advocates, and legal representatives for you to ensure you are able to access the services you need in line with the Act.

Safeguarding vulnerable adults from abuse and neglect.

Safeguarding duties apply if you:

- ▶ Have needs for care and support (whether or not they are receiving any services); and
- ▶ Are experiencing, or at risk of, abuse or neglect; and
- ▶ As a result of those care and support needs are unable to protect yourself from either the risk of, or the experience of abuse or neglect

If a safeguarding concern is identified by us, we will follow RHP's Safeguarding Policy to make a referral to Adult Social Services, or the Police in an emergency, to protect you from harm.

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Training and Awareness

Employee Training: We will provide comprehensive training to employees on the needs and challenges faced by vulnerable customers. This training will cover recognising signs of vulnerability, effective communication strategies, understanding support services, and responding appropriately to anti-social behaviour incidents.

Policy Review:

This Vulnerable Customer Policy will be reviewed regularly to ensure its effectiveness and relevance.

By implementing this Vulnerable Customers Policy, we aim to create an inclusive and supportive environment where vulnerable individuals can access services, receive appropriate assistance, and live with dignity and respect.

This policy should be read in conjunction with our Unreasonable Behaviour Policy.

Complaints

If you are not satisfied with the service you have received from us, you can raise a complaint. We will accept complaints from those who are supporting you as long as you have given them your permission. We will make reasonable adjustments to our services and how you access them based on what you have shared with us about your vulnerability.

The Housing Ombudsman Complaints Handling Code requires us to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords shall have a reasonable adjustments policy in place to address this. This Vulnerable Customers Policy meets the requirements of a Reasonable Adjustments Policy.