



Vulnerable Customer Policy

Approved by: Customer Experience Committee

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Applies to: RHP (Association)

Vulnerable Customer Policy

INTRODUCTION:

This Vulnerable Customer 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 accessing our services and specifically 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. This is data subject to additional protection under data protection laws. The special categories are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data, health data and data concerning a natural person's sex life or sexual orientation.

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.

Aims and Objectives

To achieve fair and equitable outcomes for vulnerable customers, we will seek to:

- understand the support needs of vulnerable customers by responding flexibly and ensuring our services are accessible, consistent, and transparent.
- provide employees with the right skills and capabilities by understanding how their role contributes to ensuring fair outcomes and treatment of vulnerable customers and ensuring they have the tools to recognise, record and respond appropriately to vulnerable customers' needs.
- take vulnerable customers into account during service design to ensure services meet their needs.
- ensure systems and processes support and enable vulnerable customers to disclose their needs and help employees spot signs of vulnerability, ensuring that systems can effectively note and retrieve information about a residents' needs. In addition, employees will be empowered to escalate where standard processes and procedures do not provide the right outcome for vulnerable customers.

- ensure all communications and information about services are understandable for vulnerable customers and where possible offer multiple channels so vulnerable customers have a choice
- monitor and assess whether we are meeting and responding to the needs of vulnerable customers (including those with protected characteristics) and make improvements where this is not happening.

Defining Vulnerability

The Housing Ombudsman defines vulnerability 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 or the Housing Ombudsman Service 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."

Our definition of vulnerability builds on that of the Housing Ombudsman to recognise the impact that vulnerability may have on a person's ability to access our services and ability to live independently. 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 recognise that it can be a dynamic state that is influenced by a number of factors such as recovering or dealing with an illness or disability

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 may 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.

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- ▶ **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 older 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.
- ▶ **Risk of Homelessness:** If you are 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.
- ▶ **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 its 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.

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.

We have used the principles set out in the Housing Ombudsman's report on Attitudes Respects and Rights – Relationship of Equals in updating this policy. We understand the importance of **recognizing** where someone needs support; **respond** and adapt services to their needs and **record** those needs and or service adjustments on our systems. If you have a vulnerability and or service need please let us know so that we can record this.

Recognise:

- We will routinely ask customers when they contact us if we should do anything differently when delivering a service because of a temporary need or long-term vulnerability for them or anyone who lives with them. This will enable us to explore individual needs that may not be obvious and tailor our services to meet them.
- Use all available information and opportunities to identify if a customer is vulnerable and recognise when it is appropriate to seek additional support, such as escalating the case to the next level, seeking additional help or referring the customer to third party support.

Record:

- Collect information about the vulnerability of our tenants and their families and hold it on our customer database so that it is accessible to those who need to see it to provide landlord services.
- Keep the data that we hold up to date by carrying out a regular checks on the accuracy of data.
- Record any reasonable adjustments customers may require as a result of their vulnerability.
- Ensure that our customer records are factual, accurate and written with empathy.
- Record any known representatives for tenants and leaseholders who act on the customer's behalf.

Respond:

- Take account of known vulnerability factors in the provision of services and in decisions around tenancy management and enforcement.
- Consider any additional needs or reasonable adjustments due to a vulnerability and where appropriate vary our service delivery to ensure vulnerable customers still receive the same level of service as residents who are not vulnerable.
- Assist vulnerable customers in accessing support and tenancy sustainment services to provide enhanced support where appropriate.

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- Make referrals to statutory agencies and other external partner support agencies where appropriate and make safeguarding referrals whenever needed.

Reasonable Adjustments

We have a separate Reasonable Adjustments policy that sets out how we will support and where appropriate make changes to how we provide services so that vulnerable residents are not disadvantaged. We will decide what adjustments are needed on a case-by-case basis by discussing the requirements with vulnerable residents and their representatives and seeking to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about whether a reasonable adjustment is needed or about what the adjustments should be.

We know that some customers will need reasonable adjustments (also known as service adjustments) so that you can more easily access or receive services from us.

Identification: We will through our contact and engagement 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. For example, braille, audio formats or translation services.

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

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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.

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.

Training and Awareness

Employee Training: We will provide training to employees on safeguarding that will include 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.

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Policy Review:

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

By implementing this Vulnerable Customer 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 and our Reasonable Adjustments Policy.

As part of this policy we will review any restrictions put in place because of a customer's contact. We want to ensure that everyone has the right to access our services but we need to balance this with ensuring that our employees and those working on our behalf are safe and free from risk of abuse and or harm.

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. We have a Complaints Policy that is available on our website or can be accessed by contacting us. It sets out the details of how you can raise a complaint.

The Housing Ombudsman Complaints Handling Code requires us to adapt normal policies, procedures, or processes to accommodate an individual's needs. There is a requirement that landlords shall have a reasonable adjustments policy in place to address this. This policy meets those requirements.