



## Vulnerable Customer Policy

<b>Lead Manager:</b>	Neighbourhood Manager
<b>Responsible Senior Manager:</b>	Assistant Direct of Housing
<b>Approved By:</b>	Customer Committee
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## Contents

1. Introduction
2. Legal Framework and Context
3. Aims and Objectives
4. Definition
5. Assessment and sign up of new tenants
6. Recording Vulnerability
7. Communications
8. Reasonable Adjustments and other adjustments to services
9. Tenancy Management
10. Tenant involvement
11. Repairs
12. Aids and Adaptations
13. Safeguarding
14. Floating Support Services
15. Independent Living Accommodation
16. Specialist Advice and Support
17. Consultation
18. Review
19. Training
20. Equality and Diversity

## 1 Introduction

- 1.1 Shropshire Towns and Rural Housing (STAR) is an Arms' Length Management Organisation; (ALMO) and manages the stock on behalf of Shropshire Council. It is responsible for the Council's housing stock including the letting, maintenance, and management of its properties and estates.
- 1.2 This policy sets out our approach to identifying and assisting vulnerable customers, with the overall aim of helping them to sustain and maintain a tenancy.
- 1.3 We will work in partnership with our customers, contractors and other stakeholders and public bodies where it is effective to do so.
- 1.4 This policy does not seek to explain how we will approach every situation; it is intended as a general statement of our approach to ensuring our vulnerable tenants receive the support, they need to sustain their tenancy and live as independently as possible in their home and to promoting equality of outcomes.
- 1.5 This policy applies to of STAR's customers, including prospective customers.

## 2 Legal Framework and context

- 2.1 This policy supports us to fulfil obligations and responsibilities under the following legislation, in no particular order:
  - Anti-social Behaviour, Crime and Policing Act 2014
  - Hate Crime: The Crime and Disorder Act 1998
  - Protection from Harassment Act 1997
  - Safeguarding Vulnerable Groups Act 2006
  - Disabled Persons (Services, Consultation and Representation) Act 1986
  - Mental Capacity Act 2005
  - The Equality Act 2006 & 2010
  - The Human Rights Act 1998
  - Financial Services and Marketing Act 2000
  - The Housing Act 1985, 1988, 1996 & 2004
  - Housing and Regeneration Act 2008 • Data Protection Act 1998/2018
  - Domestic Abuse Act 2021
  - The Care Act 2014
  - The Children's Act 2004
  - Homelessness Act 2002
  - Human Rights Act 1998

### 3 Policy Statement

- 3.1 STAR provides housing and housing-related support services to a wide range of people, some of whom may, at some point, be vulnerable. STAR is committed to meeting the needs of all its social housing tenants to ensure their independence, privacy, and dignity, and to treating them with fairness and respect.
- 3.2 Our staff will be responsive to customers' diverse and changing needs and take these into account wherever possible when taking decisions or delivering services.
- 3.3 We will ensure that we equip staff to provide customers with advice and support and take a person-centred approach.
- 3.4 We will work with relevant statutory and voluntary sector partners to provide support to tenants where and when necessary.
- 3.5 We expect all our staff to be aware of the possibility that a customer may be vulnerable, which they may identify from the information they receive or their own observations. If a member of staff suspects that someone is vulnerable, they should discuss the support services offered by STAR or other local agencies with the tenant. Estate-based staff or contractors can raise concerns as appropriate via the relevant Total Mobile forms or by contacting the Service Manager.
- 3.6 We will assess our customers vulnerability by: -
  - using all available information at sign up and throughout the lifetime of the tenancy to identify vulnerable tenants.
  - being responsive to requests for adjustments to our services wherever practicable.
  - identifying support needs and making appropriate referrals to support services such as floating support and financial inclusion.
  - making referrals to statutory agencies and other support agencies where appropriate.
  - regularly reviewing our service provision to ensure that it is suitable, flexible, and responsive to the needs of tenants; and
  - make safeguarding referrals where needed and as appropriate.
- 3.7 The nature of the support provided will depend on the level of vulnerability and the individual's or household's circumstances. It may be short-term or long-term, and it may be provided directly by STAR or by specialist external agencies following a referral. Support may also be time-limited to encourage a tenant to adjust their lifestyle choices and/or gain the skills, motivation, or confidence to move on to greater independence.
- 3.8 A tenant's vulnerability may be identified by any member of STAR staff who have contact with tenants, and from information provided by tenants when they apply for housing or services, by self-referral, by an external agency or by our contractors or partners.

## 4 Definition

- 4.1 Vulnerability has different definitions in different legislations but is generally defined as someone who is more likely than the 'average' person to suffer detriment or harm. Vulnerability can also be defined as being where an individual or household experiences difficulties with every-day living on account of financial, educational, health, age, employment, learning, language, behavioural, family, social, other circumstances, or any combination of these. STAR considers tenants may be vulnerable if they experience difficulties with everyday living to the extent that they need additional support to make sure they are not at a disadvantage and/or to sustain their tenancy; in some instances, this definition is applied to the whole of the household.
- 4.2 STAR's approach does not assume that whole groups of tenants are vulnerable. We also recognise that vulnerability may not be permanent, and that people may be vulnerable at different times for different reasons. Although this is not intended to be an exhaustive definition as each case should be considered on its own merit, for the purpose of this policy the types of people who may be considered vulnerable can include:
- people aged 75 or over who are frail.
  - people with a physical or sensory disability which impacts on the performance of normal daily living tasks or personal care tasks.
  - people with mental health issues.
  - people with learning difficulties.
  - people with serious long-term, or terminal illness.
  - people with a recent history of homelessness, rough sleepers, refugees, and those with no experience of independent living.
  - people experiencing domestic abuse.
  - people experiencing hate crime.
  - people with substance misuse problems, e.g., alcohol or drugs.
  - pregnant women, especially teenagers.
  - young people at risk, including those leaving care and teenage parents.
  - people with significant problems with finances / budgeting.
  - People who have difficulties understanding, speaking, or reading English.

## 5 Assessment and sign-up of new tenants

- 5.1 At the point of sign up by STAR, prospective tenants will have the opportunity to identify and discuss the needs of any vulnerable household member. We will collect information about disability and other health issues, communication needs, existing support structures, and other support requirements.
- 5.2 We will engage with existing support structures wherever possible, working closely to ensure continuity of care is provided as tenants' housing changes. STAR will make

referrals to the floating support service if vulnerabilities are identified by staff at assessment and no support plan is in place.

- 5.3 At tenancy sign-up we will review any information on vulnerability received from tenants or from other relevant agencies to assist in ensuring any offer of housing is right for the individual or household, and the most compatible form of tenure is in line with Shropshire Council's Allocation and Scheme.

## **6 Recording vulnerability**

- 6.1 Staff are expected to take every opportunity to update our systems with information about tenants' circumstances through their day-to-day service delivery. STAR takes a patch-based approach to housing management that promotes Neighbourhood Housing Officers knowing their tenants and being able to identify early signs of vulnerability; however, it is the responsibility of every member of staff to report any vulnerability concerns they identify during their work.
- 6.2 Where a tenant is identified as 'vulnerable', according to the definition in 4.2, staff will make an appropriate record on the housing management system and any other systems as required. Staff are expected to review the tenant's account on the housing management system and other systems to be alert of the tenant's and/or household's needs, including communication and access, and to tailor our services to those needs.
- 6.3 STAR records and manages all data in line with the Data Protection Act 2018 and the UK-GDPR (General Data Protection Regulation).

## **7 Communications**

- 7.1 STAR communicates with its tenants in a variety of different ways, including:
- online via our websites and social media
  - email
  - telephone
  - text
  - letter
  - face to face
- 7.2 Information can be made available in different formats to ensure we communicate with our tenants in the best way possible and tailored to their individual needs wherever practicable. This includes in other languages, braille, and large print. Tenants can request alternative communication formats from any member of STAR's staff.
- 7.3 Tenants can also request that correspondence is sent to someone who will act on their behalf, such as an advocate.

## **8 Reasonable adjustments and other adjustments to services**

- 8.1 STAR will consider requests from disabled tenants for reasonable adjustments under the Equality Act 2010 in line with its Enabling Tenants to Live Independently in their Home Policy
- 8.2 STAR will also adjust service delivery arrangements, where practicable, for tenants who are otherwise considered vulnerable. STAR may become aware of vulnerability when a tenant makes a request for a service. The member of staff will discuss the services offered by STAR and will make a referral for specialist support if appropriate. More detail is included in our Reasonable Adjustments Policy.
- 8.3 STAR may use profile and other vulnerability information proactively to inform the way we deliver services, provide information, or provide help with accessing services. This may include:
- providing advice and by signposting tenants to other organisations.
  - making referrals to support services within STAR or to external specialist agencies.
  - helping with the completion of forms and provision of documents.
  - making more regular contact with a tenant or household.
  - undertaking home visits.
  - allowing more time to get to the telephone or door.
  - adjusting our processes where it is practicable to do so, for example to provide responses or services more quickly or to allow additional time.
  - request Universal Credit housing costs for some tenants to be paid direct to STAR.

## **9 Tenancy management**

- 9.1 For all new tenancies regardless of whether a tenant or household has been identified as vulnerable, we will undertake a 'welcome visit' approximately four-six weeks after sign-up as an opportunity to identify any vulnerability concerns or support needs, as well as early warning of any potential problems with the tenancy. The visit will take place in-person at the tenant's home.
- 9.2 We recognise that failing to comply with tenancy conditions may be a symptom of an individual's vulnerability. All investigations of tenancy breaches (e.g., rent arrears, or damage to property) will consider vulnerability as part of the assessment process. Our employees will be sensitive to the individual's circumstances and will use a variety of techniques to try to resolve tenancy breaches before situations escalate, or debts become unmanageable.

- 9.3 Anti-social behaviour will be managed in line with our Anti-Social Behaviour Policy, and the needs and circumstances of victims and alleged perpetrators including vulnerabilities, will be considered in our approach and the support we provide.
- 9.4 Instances of hoarding will be managed in line with our Hoarding Policy, and STAR will provide reasonable support and help to facilitate practical solutions with the support of partner agencies, with the overall aim of achieving an outcome that is positive and sustainable for its tenants and keeps them in their homes wherever possible.

## **10 Customer Engagement**

- 10.1 We recognise that customers who are vulnerable may find it more challenging to engage with us. We believe in the right for all tenants to be involved in the management of their homes, to influence our work and service delivery, and to scrutinise our performance. We will take reasonable and practicable steps to encourage tenants to be involved and will regularly review accessibility and barriers to involvement.

## **11 Repairs**

- 11.1 In line with our Responsive Repairs Policy, we may accelerate repairs or otherwise adjust our repairs service for people with health or vulnerability issues. When a customer contacts STAR to report a repair the member of staff handling the request will confirm if there are any disabilities or support needs which should be considered.

## **12 Aids and adaptations**

- 12.1 STAR recognises that the timely provision of aids and adaptations can help people live independently and comfortably in their own homes and will provide a service in line with its Enabling Tenants to Live Independently in their Home Policy.

## **13 Safeguarding**

- 13.1 Safeguarding is everyone's responsibility. All staff have a duty to be aware of the factors that may increase a tenant's risk of abuse and neglect, and to act on any concerns. STAR will follow its Safeguarding Policies in the event of suspected abuse or neglect of children or vulnerable adults being identified.

## **14 Floating support services**

- 14.1 Tenants may be referred to STAR's housing floating support services which provide support to tenants who need additional assistance to maintain their home and their independence. Support staff will work with tenants to provide practical advice to help



people to maintain their accommodation. They will also sign-post tenants to alternative Shropshire Council and/or voluntary services for additional support where necessary. Floating support arrangements will be reviewed after six weeks and phased out gradually when support is no longer needed.

## **15 Independent Living Accommodation**

15.1 STAR's Independent Living schemes provide accommodation for people who require additional support but want to maintain their independence.

## **16 Specialist advice and support**

16.1 STAR recognises that poverty and debt are more prevalent in social housing than in the general population and are a form of vulnerability. We will use strategies, projects, and support services to help tenants prevent or reduce debt, manage their money, and maximise their incomes. We use a tailored, person-centred approach to provide support and specialist advice regarding benefit advice, skills, and wellbeing.

16.2 STAR recognises the need for joined up working to best support vulnerable tenants who may have a diverse range of needs. STAR works with external organisations such as Adults and Children's Services, mental health support teams, emergency services, and organisations in the voluntary and community sector. Representatives from STAR will attend case conferences where required and a tenant needs a multi-service approach.

## **17 Consultation**

17.1 Shropshire Towns and Rural Housing consults with staff, external agencies, customer policy focus groups and STAR's customer services subcommittee to promote continuous improvement and develop good practice in the use of this policy.

## **18 Review**

18.1 STAR will review this Policy every 3 years, unless changes in legislation or regulation require an earlier review.

## **19 Training**

19.1 Shropshire Towns and Rural Housing provides continuous development and training for its staff who are responsible for implementing this policy.

## 20 Roles and Responsibilities

All employees	General overview of Policy
Neighbourhood Housing Officers	Implementation of Policy
Senior Neighbourhood Officers	Line Management Responsibility of neighbourhood officers in the implementation of this policy
Neighbourhood Manager	Overall responsibility for the operational day to day implementation of this policy.  Monitoring performance indicators and management information and day to day oversight of the quality of service and outcome
Assistant Director Housing	Accountable for the implementation of this policy and for reporting performance to key stakeholders including SMTs, ET and Customer sub-Committee

## 21 Equality and Diversity

21.1 We will ensure that this policy is applied fairly and consistently to all our customers. We will not directly or indirectly discriminate against any person or group of people because of their race, religion, age, gender, marital status, sexual orientation, disability, or any other grounds set out in our Equality, Diversity, and Inclusion policy.

21.2 When applying this policy, we will:

- Act sensitively towards the diverse needs of individuals and communities.
- Take the necessary positive action to reduce discrimination and harassment in local communities.

21.3 This policy and any other related publications of Shropshire Towns and Rural Housing are available on request in other formats (e.g. in an alternative language, in Braille, on tape, in large type).