

Vulnerability, Support for Customers and Reasonable Adjustments Policy

DESIGN HEADER TO INCLUDE POLICY NAME AND DATE RANGE

INFORMATION

Policy Name	Vulnerability, Support for Customers and Reasonable Adjustments Policy
Effective Date(s)	May 2024
Approved By	Risk and Compliance Group Customer Services Committee
Approval Date	May 2024
Policy Owner/Dept	Paula Marshall, Director of Housing & Customer Service
Policy Author	Paula Marshall
Review Date	April 2026
Policy Framework Ref	
Version Number	V1.0

Your Housing Group Strategic Priorities			
Safe	<input checked="" type="checkbox"/>	Viability	<input type="checkbox"/>
Landlord	<input checked="" type="checkbox"/>	Growth	<input type="checkbox"/>
People	<input type="checkbox"/>	Technology	<input type="checkbox"/>

Relevant National Standards or Regulation	Please State if the Policy aligns to any of the Regulators Standards: <ul style="list-style-type: none"> • Safety and Quality Standard • Neighbourhood and Community Standard • Tenancy Standard
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Relevant Legislation	Anti-Social Behaviour Crime and Policing Act 2014 Health and Safety at Work Act 1974 Data Protection Act 2018 Equality Act 2010 Housing and Planning Act 2016 Social Housing Regulation Act 2023
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1. Purpose of the Policy

This policy sets out Your Housing Group's (YHG's) approach to providing support to our customers and tenants in order to provide the best chances of their tenancy or lease being sustained, and to improve their customer experience with YHG. This policy also sets out how we will record the information that customers disclose to us in relation to any vulnerabilities.

2. Scope of the Policy

This policy applies to all customers of YHG including tenants, leaseholders and applicants.

This policy is applicable to all staff and training is mandatory for staff who deal with customers or assets.

3. Definitions

Vulnerability – Customers who have a particular characteristic and/or experience an exceptional life event and are currently unable to act independently and/or are unable to cope with managing their tenancy without additional support. This can be an interchangeable state which can be influenced by a number of factors and experiences e.g. age, bereavement, mental health, neurological/development disorders (including autistic spectrum disorders (ASD)), disability, poverty, domestic abuse etc.

Reasonable Adjustments – These are changes that YHG when providing services to customers will consider and may implement with customers (where appropriate) in order to prevent their vulnerability or support needs putting them at a disadvantage when accessing our services.

UDC – User Defined Characteristic – the way that we record a vulnerability or other information in relation to a customer or an asset (property) or tenancy.

Customer Data – this is the data that is collected from customers in order for us to be able to improve the services we deliver, and may also result in reasonable adjustments being offered.

Protected Characteristics – these are the 9 protected characteristics under the Equality Act 2010, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

4. Consultation

Consultation has taken place with internal stakeholders, and our involved customer groups.

This policy has been approved by Risk and Compliance Group and our Customer Services Committee.

5. Background and Context

YHG provides services to circa 28,000 properties, across a wide mix of tenures including assured tenants, leaseholders, shared ownership and customers in our market rent properties. It is therefore likely that we will be dealing with a range of customers who have a variety of needs, some of which have to be identified and noted to enable staff to assist customers in the most appropriate way, in order to meet their requirements, whilst also ensuring staff safety.

6. Policy Detail

The aim of this policy is to set out the levels of support that will be provided for customers who are vulnerable or have additional or complex needs. A customer vulnerability can be disclosed to us by a customer, or we may tailor our service to meet the needs of the customer as they are presenting to us without disclosure, for example, a very elderly frail person who may need additional time and support to carry out a task such as signing a document.

In any situation where a child or vulnerable adult is suspected or known to be at risk of abuse YHG will notify the relevant statutory authority immediately in accordance with our Safeguarding policies and procedures.

Where it is identified that an individual does not have the mental capacity to make decisions for themselves, we will work with carers, advocates and legal representatives of customers to ensure they are able to access the services they need in line with the Mental Capacity Act 2005.

As part of our approach to supporting customers, on occasion depending on presenting factors we may need to:-

- Liaise with appropriate agencies to assist in meeting the needs of vulnerable customers.
- Make appropriate referrals to agencies to provide relevant support to vulnerable customers.

6.1 Types of Support Offered

We offer the following support to customers which can vary depending on the customer needs which can also vary depending on the information known and recorded.

Money Advice Support

We will offer advice on a one to one basis to all customers who either request this or present as needing support with accessing benefits, welfare support (for example emergency food and fuel vouchers) and debt advice. This confidential support can be provided either over the phone or in person either at one of our customer hubs or in the customer's own home if preferred. We will make every effort to engage with customers

and to continue working with them to provide the best possible financial support and outcome for them.

Floating Support

We will offer floating support through a number of teams to provide customers with one to one support to provide the best chances of them being able to live well in one of our homes. This support is tailored according to customer need and demand, and could be for one of the following reasons (but this is not an exhaustive list).

- Support to set up a tenancy, including assistance with provision and sourcing of goods, setting up utilities and budgeting for household expenditure.
- Support to maintain independence in one of our Older Persons' Schemes. This can include additional support for reporting repairs and issues, welfare checks and the installation of equipment for emergency purposes.
- Ongoing support to assist customers with day to day tasks that they are unable to do independently due to a vulnerability, for example dealing with appointments or processes for customers with a diagnosed mental health condition.

Our team will carry out an assessment to understand the level of support needed and whether this is something we are able to offer. If we feel that the level of support is greater than we can provide then we will signpost and make referrals to other agencies who may be better placed to provide this support.

Living Well

Occasionally, one of our customers may reach a crisis point in their life, which can be triggered by a number of events such as bereavement, mental health crisis, addiction, or severe change in life circumstances. Our team will make an assessment based on the presenting factors, and if we are able to provide support then we will arrange for a Support Worker to make contact and agree a plan of support.

Where safeguarding concerns have been raised by customers, staff and contractors our Support Workers will agree an appropriate course of action based on a risk based person centred approach. We will ensure that all safeguarding referrals that staff, contractors and customers have made are recorded appropriately, and we will also record any incidents where we refer onto another agency.

Our Support Workers will also provide support to customers who have a tendency to hoard, and work in a positive way with those customers to try to improve the condition of the property so that this is a safe environment for customers to live in and for their neighbours and our staff to carry out their work in.

Please also see YHG's Hoarding Policy and Safeguarding Policy.

Domestic Abuse

We will offer support to victims of domestic abuse, and we will work with local authorities, police and other agencies to ensure that customers are safe and can access our services as

needed and other services as required. Support can be provided at a location that is preferred by the customer and we will also work with the Multi Agency Risk Assessment Conference for the area to ensure that victims are safeguarded and receiving the appropriate support. Please also see our Domestic Abuse Policy.

Recording of customer data, vulnerabilities and making reasonable adjustments

We will collect information from customers both at the start of a tenancy or lease and at intervals throughout. The purpose of collecting the data is to enable us to provide a better quality service and offer a service tailored to the customer where needed. Customer data will be collected and may include ethnicity; disability; age; gender; religion; language and sexuality in order to understand customer needs. Many vulnerabilities or protected characteristics do not require support intervention as set out above, but they may require YHG to respond to customer needs so that customers are able to receive services. This is also known as a reasonable adjustment and can include things like a faster appointment slot for an emergency if a customer has a need or vulnerability that would impact them more, or agreeing to send female staff if this is preferred due to cultural reasons. Customers' vulnerabilities and those of their household should be taken into account when offering day to day services as a customer's needs may be different due to their vulnerability. This means that all staff will be trained to look out for vulnerabilities that may affect a customer's ability to receive services, to record this appropriately and to tailor the service where this is possible. Some examples of this are given below:

Mr PG

Mr PG let us know that he suffers from post traumatic stress disorder, and is currently being treated for depression and anxiety. As a result, he does not like unannounced visits and prefers to know who is coming to see him at any given time so that he is able to prepare for the visit and arrange for an advocate to be present if possible.

We would record this on our system which would let others in YHG know that they would need to make appointments in advance rather than sending contractors without an appointment or calling unannounced. This would only refer to the disclosure, as follows:

Customer (and address)	Vulnerability	Notes or reasonable adjustment
Mr PG	Mental health condition - PTSD - Anxiety	Does not want any unannounced visitors – please make appointments

Ms DF

Ms DF advised us that English is not her first language. Therefore, where possible Ms DF would like information sent in her first language and any telephone or in person conversations to be with an interpreter using a translation service.

We would record this on our system using a UDC so that when we needed to write to Ms DF we could arrange for text to be translated and also arrange for interpreter services if we needed to speak to Ms DF so that she was able to understand our communications.

Customer (and address)	Customer Data	Notes or reasonable adjustment
Ms DF	Language	English not first language, please use translation and interpreter

Due to restrictions on the many systems we use and the links between these, it may not always be possible to fully deliver the request, for example when large mail outs are done. Some UDCs will generate an alert, which can be viewed by staff to help them deliver services to customers.

7. Responsibilities under this Policy

The Director of Housing & Customer Services is responsible for the development, review and implementation of this policy.

8. Risk Management

The following risks have been identified in relation to non-compliance with this procedure:

- Breach of the Data Protection Act 2018 resulting in action being taken against YHG by the Information Commissioner's Office.
- Action being taken against YHG by customers due to incorrect or out of date information being held about them, resulting in financial loss and reputational harm to the organisation.
- Health & Safety risk to staff and contractors as a result of incorrect or out of date information or no information being available to alert them of a risk.
- Health & Safety risk to staff as a result of failing to check the UDCs against a customer or property before carrying out a visit.
- Any relevant information stored in Datix will be transferred to the housing management system manually.

9. Data Protection, Record Storage and Retention

YHG take their responsibilities under the Data Protection Act 2018 seriously.

Alerts around customer vulnerability will have to be accessible to all staff, but YHG will ensure that only information necessary is included on alerts, that they are subject to regular review to ensure accuracy and relevance and there is oversight offered by both the Risk and Assurance Team and the Data Protection Lead.

Customer data will not be retained in line with customer records and fall outside the YHG Data Retention Policy. They will be reviewed periodically and removed if no longer

needed. If staff become aware of the need to remove an alert they should notify a manager who can remove it.

10. Equality and Diversity

This policy complies with the Equality Act 2010. Issues of vulnerability are considered as part of our customer offer and services tailored as required. This is done on a case by case basis.

This policy has been Equality Impact Assessed and any findings addressed.

This policy is available in alternative formats on request.

11. Communication

This policy will be stored on the YHG intranet and a communications plan is in place to notify staff.

This policy will be a mandatory read for all staff who are customer facing.

12. Learning and Development

All staff who interact with YHG customers and assets will be trained on this policy.

13. Performance Management of this Policy

We will monitor the effectiveness of our support offer to customers in a variety of ways, including (but not an exhaustive list):

- Number of referrals into each support service
- % of tenancies sustained
- Support provided to customers with reasonable adjustments

14. Review of this Policy

This policy will be reviewed every two years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Group wide policies.

The Director of Housing & Customer Service Delivery has responsibility for updating this policy.

Related Documents

Document Type	Name
Connected Policies and Procedures	Data Protection Policy Data Retention Policy Equality, Diversity and Inclusion Policy UDC Procedure Health and Safety Policy Anti-Social Behaviour and Hate Crime Policy Domestic Abuse Policy Safeguarding Policy Hoarding Policy
Forms and Letters	
Leaflets/Publicity Material	
Training Materials Available	
Intranet/ Website Page	