



VULNERABLE PERSONS POLICY:

Help when you need it.

POLICY TITLE:	Vulnerable Persons Policy: <i>Help when you need it</i>
LEAD OFFICER:	Head of Housing Management
DATE APPROVED:	February 2025
APPROVED BY:	SLHD Board
IMPLEMENTATION DATE:	February 2025
DATE FOR NEXT REVIEW:	February 2028
ADDITIONAL GUIDANCE:	
ASSOCIATED CUSTOMER PUBLICATIONS:	<p>Equality, Diversity and Inclusion Policy</p> <p>Secure Tenancy Agreement</p> <p>Corporate Plan 2024-2028</p> <p>Equality and Diversity Strategy</p> <p>CDC Allocations Policy</p> <p>Customer Access Strategy</p> <p>Secure Tenancy Strategy</p> <p>Housing Management Policy (including ASB and Safeguarding)</p> <p>Compliments, Comments and Complaints Policy</p> <p>Repairs and Maintenance Policy</p> <p>Rechargeable Works Policy</p> <p>Ad-Hoc Fencing Policy</p> <p>Damp and Mould Policy</p> <p>Communications Strategy</p> <p>Customer Access Strategy</p> <p>Fire Management Policy</p> <p>Data Smart Strategy</p> <p>ICT Strategy</p> <p>Domestic Abuse Policy</p>
TEAMS AFFECTED:	All Employees, Contractors, Board Members and St Leger Homes Customers

THIS POLICY REPLACES WITH IMMEDIATE EFFECT:	N/A
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DOCUMENT CONTROL

For guidance on completing this section please refer to the document version control guidance notes

Revision History

Date of this revision:	New Policy – entirely replaces the previous Policy
Date of next review:	February 2028
Responsible Officer:	Head of Housing Management

Version Number	Version Date	Author/Group commenting	Summary of Changes
01	Feb 2025	Head of Housing Management	New Policy

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Policy Creation and Review Checklist

ACTION	RESPONSIBLE OFFICER	DATE COMPLETED
Best practice researched (HouseMark, HQN, NFA, RSH, general websites)	Head of Housing Management	January 2025
Review current practices from similar organisations (NFA)	Head of Housing Management	January 2025
Review customer satisfaction / complaints data from the area the policy relates to	Head of Housing Management	January 2025
Undertake customer consultation if applicable	Head of Housing Management	January 2025
Staff consultation through Trade Unions if applicable	Head of Housing Management	N/A
Trade Union consultation if applicable	Head of Housing Management	N/A
Other stakeholder consultation if applicable	Head of Housing Management	N/A
Equality analysis carried out through the intranet for all new policies or fundamental changes	Head of Housing Management/EDI Manager	January 2025

NB. The above table must be completed on all occasions. The policy will not be accepted or approved by EMT without this information completed.

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VULNERABLE PERSONS POLICY:

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1. Introduction

- 1.1 This policy outlines our commitment to support vulnerable customers to access our services and supports the priorities contained in St Leger Homes' Corporate Plan 2024-2029.
- 1.2 We recognise that customers can become vulnerable at various points in their life and at such times, we may need to consider reasonable adjustments to how we usually deliver our services, ensuring equitable and appropriate access.
- 1.3 This might also include providing direct support to customers or referring them to specialist agencies to ensure the best help is received when they need it. We will ensure consistency to our customers by equipping staff with training and information, so they effectively identify and respond to customers' needs.
- 1.4 This policy focuses on customers who may be vulnerable but have the mental capacity to make their own decisions. Where this is not the case, we will collaborate with their appointed representative or statutory agencies.

2 Purpose and Scope

- 2.1 This policy applies to all Employees, Contractors, Board Members and St Leger Homes Customers.
- 2.2 For the purposes of this Policy, the term Customer is used in the broader sense and refers to tenants, housing applicants and those using our services through homeless provision or properties managed by St Leger Lettings.

3. Defining Vulnerability and the Legal Framework

- 3.1 We are committed to meeting our obligations and duties under the Equality Act 2010 and the Public Sector Equality Duty and to promoting equal opportunities in the provision of our services, as well as protecting people with 'protected characteristics' from unlawful discrimination, harassment and victimisation.

We ensure that these duties are understood throughout the organisation and that we take account of individual needs and make reasonable adjustments where appropriate in the services we provide.

Our approach to carrying out these responsibilities are fully set out in St Leger Homes' Equality Diversity and Inclusion Policy.

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3.2 Protected characteristics across our customer base are:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- Care leavers*
- Carers*

As an arm's length management organisation of City of Doncaster Council, we support the additional protected characteristics of care leavers and carers and we have adopted these leavers as a defined group with protected characteristics.

3.4 It is important to note that we do not define customers as vulnerable solely by virtue of their protected characteristics. However, we will give due regard to these characteristics for example, when developing strategies, policies, procedures or services, to avoid inadvertent discrimination.

3.5 This definition is separate from the assessment of priority need within the Homelessness Assessment, which is defined in homeless legislation.

3.6 We also recognise that some customers may be vulnerable for reasons outside the scope of these. This policy defines vulnerability and outlines our response in such circumstances.

3.7 The Social Housing Regulator's Tenant Involvement & Empowerment standard mandates us to treat all tenants with fairness and respect, demonstrating an understanding of tenants' diverse needs, including those with additional support requirements.

3.8 **Defining Vulnerable Customers**

In this Policy, we define 'vulnerable' as customers who possess protected characteristics which may make them vulnerable or those who are experiencing exceptional life events, making it difficult to manage their day-to-day affairs without additional help. This can be a permanent or temporary state.

As mentioned previously, a protected characteristic, does not automatically assume a person is vulnerable.

Exceptional life events or other circumstances that may render people vulnerable, whether for a short period or longer-term, includes:

- those experiencing and survivors of domestic abuse.
- people who have substance misuse issues.
- People experiencing poor physical or mental health.

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- those who are or have recently been homeless or living in temporary accommodation.
- people experiencing severe financial hardship or financial abuse.
- people neglecting their health and wellbeing.
- care leavers.
- ex-service personnel.
- being a victim of crime.
- recent hospital discharge following long-term stay.
- refugees or asylum seekers,

4. The Policy

4.1 Our primary objective is to ensure that vulnerable customers can access and receive our services without hindrance. To achieve this, we will:

- Record customer contact information regarding identified vulnerabilities and use interactions with customers to check and verify these where necessary.
- Use customer and tenant insight data including vulnerabilities in our strategic and operational decision-making.
- Assist vulnerable customers in accessing our services and direct them to additional support when needed.
- Ensure our staff are trained and knowledgeable in how to identify and take account of vulnerabilities when delivering all our services.
- Refer cases requiring short-term support or assessment to our Tenancy Sustainability teams for Tenancy or Mental Health support.
- Refer to statutory services or other specialist support as required.
- Make safeguarding referrals or raise concerns as appropriate.

4.2 We will give consideration to known vulnerabilities in terms of how we deliver services to individuals for all of our services, but particularly in relation to the following:

4.2.1 Repairs, maintenance and home improvements

We will take account of any known vulnerabilities and will consider reasonable adjustments when arranging repairs with regards access, appointments and repair priorities. We will also use customer and tenant insight data with regards known vulnerabilities to inform improvement programmes.

4.2.2 Income management and rent payments.

We will use insight data to improve financial resilience for vulnerable customers and will adhere to a pre-action protocol in managing non-payment of rent, so that legal enforcement is used only as a last resort when other efforts have failed.

We will carry out a proportionality assessment when considering legal enforcement options for rent arrears, giving due regard to an individual's protected characteristics and any known vulnerabilities to consider if the tenants behaviour is related to their disability or vulnerability and if alternative

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sanctions or solution can be used. Tenants will be offered tenancy support prior to any legal enforcement being considered.

4.2.3 Tenancy management and enforcement

We will carry out a proportionality assessment when considering when considering legal enforcement options, giving due regard to an individual's protected characteristics and any known vulnerabilities.

4.3 We commit to using customer data and customer interactions across the organisation, as an opportunity to:

4.3.1 **Identify Vulnerability** – by ensuring our staff across our teams are trained to recognise signs of potential vulnerability, such as anti-social behaviour due to mental health issues (both victim or perpetrator), repeated failure to respond to correspondence, hoarding, multiple repairs/damage, property and self-neglect, failure to meet tenancy conditions such as rent payments.

4.3.2 **Record Vulnerability** – As well as the customer's equality and diversity information, we will document any known vulnerabilities, communication needs/preferences and access requirements, along with the contact details of any authorised representatives, on our housing management system.

Safeguarding concerns will be addressed in line with our Safeguarding procedures, ensuring relevant statutory agencies are notified.

4.3.3 Reasonable Adjustments

We will consider reasonable adjustments to our services to meet the needs and circumstances of vulnerable individuals to ensure the best experience of our services and help them to sustain their tenancy.

Examples of Service-specific adjustments may include as appropriate:

- ✓ Tenancy support team to offer short-term intensive support – with tenancy-related or low-level mental health issues, alongside robust safeguarding referral processes.
- ✓ Allowing more time for a customer to answer the door when visiting.
- ✓ Arranging joint visits with support workers or representatives.
- ✓ Taking into account how a request for a repair will impact on a vulnerable person when prioritising repairs.
- ✓ Escalating remedial processes for damp and mould reports involving vulnerable tenants.
- ✓ Providing in-person or telephone explanations of letters
- ✓ Offering support to perpetrators of anti-social behaviour before enforcement.

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- ✓ Where appropriate, seeking civil remedies or injunctions rather than eviction, for vulnerable individuals.
- ✓ Providing welfare benefits and money advice for vulnerable tenants in rent arrears.
- ✓ Making provisions for vulnerable tenants for issues they cannot manage, for example moving furniture pre-post repair or day rooms for disturbance works, removals for transfer or downsizing use etc. The assistance could be practical or financial such as accessing grants and funds to assist.

5. Tenants Lacking Capacity

5.1 In accordance with the Mental Capacity Act 2005, we will liaise with legally authorised representatives, including those holding lasting power of attorney, deputyship orders, appointees from the Department of Work and Pensions, as well as statutory and independent mental capacity advocates.

6. Ownership and Responsibilities

6.1 The ownership and responsibility of managing the implementation and relevance of this policy will remain with the Head of Housing Management. However, the application of the policy will apply to all Service areas as feature of our service offer.

7. Procedures

7.1 This policy has used guidance from a range of sources including the Housing Ombudsman Knowledge and Information Management spotlight report '*On the record: Spotlight on Knowledge and Information management*' and The Housing Ombudsman spotlight report '*Attitudes, rights and respect*'.

7.2 Procedures developed to support this Policy will consider recommendations contained in two Ombudsman's Spotlight Reports '*On the record: Spotlight on Knowledge and Information management*' and '*Attitudes, rights and respect*' to:

- Ensure the customer insight data we hold is accurate, appropriate, regularly reviewed and used in operational service delivery and strategic decision-making.
- Ensure relevant staff are appropriately trained to recognise and respond positively to the needs of vulnerable customers.
- Ensure each policy review captures how it can accommodate vulnerability needs.
- Explore the potential for using insight data. For example, in extreme weather conditions or as part of our business continuity planning process.

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8. Monitoring, Compliance and Effective Implementation of the Policy

- 8.1 We will review this Policy regularly to ensure that it is fair, consistent, and effective and will use feedback from customer consultation, compliments and complaints to help inform any revisions.

We will publish this Policy on our website as part of the implementation and make it available to anyone who requests it.

We will comply with the General Data Protection Regulations (Data Protection Act 2018) with regards how we collect and store personal data.

- 8.2 Training will be provided to staff with regards Equality and Diversity, safeguarding (Level 1) and GDPR, with more extensive safeguarding and vulnerability training provided to those staff where this is a more fundamental feature of the role.

9. Performance

- 9.1 We will monitor this policy in the following ways.

- Annual EDI report to Board
- Annual vulnerability report to Board
- Annual Safeguarding report to Board
- Analysis of complaints
- Analysis of Tenant Satisfaction Measures
- Analysis of Tenant Satisfaction Transactional Surveys
- Analysis of other customer feedback

10. Background Document/Research:

Housing Ombudsman spotlight report *“On the record: Spotlight on Knowledge and Information management*

The Housing Ombudsman spotlight report *‘Attitudes, rights and respect’*

Equality Act 2010: guidance - GOV.UK (www.gov.uk)

Tenant Involvement and Empowerment Standard - GOV.UK (www.gov.uk)

This policy should be read in conjunction with

- Equality, Diversity and Inclusion Policy
- Secure Tenancy Agreement
- Corporate Plan 2024-2028
- Equality and Diversity Strategy
- CDC Allocations Policy
- Customer Access Strategy
- Secure Tenancy Strategy
- Housing Management Policy (including ASB and Safeguarding)
- Compliments, Comments and Complaints Policy
- Repairs and Maintenance Policy
- Rechargeable Works Policy

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- Ad-Hoc Fencing Policy
- Damp and Mould Policy
- Communications Strategy
- Customer Access Strategy
- Fire Management Policy
- Data Smart Strategy
- ICT Strategy
- Domestic Abuse Policy

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