

Vulnerable Customers

Policy

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| **Staff affected** | All staff | **Issue date** | In consultation to be confirmed |
| **Approved by** |  | **Review Date** | In consultation to be confirmed |
| **Lead Officer** | John Hudson | **Reviewed by** | Alison Caires |

1. **Introduction**

1.1 The purpose of this policy is to provide an overarching framework to how Arches identifies, records and tailors its services to vulnerable customers and ensures that these outcomes are evidenced.

1.2 This policy sets out Arches Housing’s commitment to assisting our vulnerable customers and residents to ensure they can access our housing, our services, and receive the assistance they need to sustain their tenancy.

1.3 Arches provides a significant amount of additional support and responds flexibly to residents who are facing difficult circumstances that can make them more vulnerable and unable to cope and manage their tenancy. We know there is more we can do, particularly in ensuring we are consistent in our approach by providing our staff with the information, understanding and tools to respond appropriately to our vulnerable resident’s needs. This policy sets out the steps we will take to achieve this.

1.4 It focuses on residents who are vulnerable but have capacity to make their own decisions. Where a resident has been assessed as lacking, or believed to lack capacity to make decisions, we will work with their appointed representative.

1. **Legal Duties and Regulatory Requirements**

2.1 Arches has a duty under the Equality Act 2010 to ‘advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it’. The protected characteristics are age, disability, being pregnant or on maternity leave, gender re-assignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation.

2.2 The Social Housing Regulator requires that:

Registered providers must use relevant information and data to:

a) understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and

b) assess whether their housing and landlord services deliver fair and equitable outcomes for tenants.

2.3 Arches also has a duty under the Care Act 2014 and the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012) that places a statutory duty on housing providers to act on concerns that children or adults may be at risk of abuse or neglect. We recognise that vulnerability and the risk of abuse are connected; customers who are vulnerable will therefore sometimes meet the statutory definition of an ‘adult at risk’ and therefore require the application of our Safeguarding policies.

2.4 The 2024 Housing Ombudsman Complaint Handling Code states that landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.

3. **Who is vulnerable?**

3.1 There is currently no universal definition of vulnerability across services, and it is recognised that vulnerability can be a dynamic state, with the potential for any customer to be vulnerable at certain points in their life.

3.2 The Housing Ombudsman Service recognises that vulnerability can arise from a combination of a customer’s personal circumstances and their characteristics.

3.3 At Arches, we recognise this and define vulnerable in relation to our services as:

**‘Customers who have a particular characteristic and/or experience an exceptional life event and are currently needing or requesting adjustments to access or receive our services.’**

3.4 An examples of people who may fall into this category would be people with disabilities or long-term health conditions – however it needs to be considered that this may include someone a minor health condition. The condition maybe exacerbated by an experience such as having damp and mould in their home and they may not be considered vulnerable until that moment and for a period of time.

1. **Identifying vulnerable tenants**

4.1 A customer’s vulnerability may be identified by:

* Customers when we make them an offer of accommodation.
* Any member of Arches staff or our contractors who has contact with customers in person, on the phone or through any other channel of communication.
* A referral from an external agency or organisation.
* A customer says they are vulnerable, and they need an adjustment to the service we are offering.

4.2 We expect all our staff to be aware of the possibility that a resident maybe vulnerable either from information they receive or from their own observations.

4.3 Arches staff delivering services to customers will have training, so they are able to recognise potential signs of vulnerability such as:

* Anti-social behaviour because of mental health issues.
* Being a victim of anti-social behaviour.
* A repeated failure to respond to correspondence or to answer the door when visited.
* Hoarding, self-neglect or other behaviour which results in their home or garden becoming damaged or neglected.

5. **Our approach to vulnerable customers**

5.1 As a responsible social landlord, our overall objective is to ensure that our vulnerable customers receive the services and assistance they need to access housing and sustain their tenancy. To achieve this, we will:

* Record vulnerabilities on our customer contact records.
* Use all available information to identify if a customer is vulnerable.
* Assist vulnerable customers in accessing additional services they may need and consider ways in which we can tailor services at a service wide level as well as on an individual basis in order to provide quality services that are accessible and equitable to all
* Record any known representatives who act on the customer’s behalf.
* Consider any additional needs due to the vulnerability and where appropriate empower our staff to vary our service delivery to ensure vulnerable customers still receive the same level of service.
* Make appropriate referrals for support.
* Carry out a Customer Impact Assessment on any new strategies, policies and procedures taking into account the impact on vulnerable customers and consider any mitigations that can be applied.

5.2 Each service area will consider what additional support, consideration, or variation in usual service provision is appropriate for vulnerable customers. This may vary from service to service, but examples may include allowing longer for customers to answer their door or the telephone, bringing forward repair appointments, joint visits with carers and explaining a letter over the phone as well as sending it.

6. **Measuring Outcomes**

6.1 As part of the regulatory framework, it is expected that landlords can evidence outcomes for tenants. Where we have identified customers as vulnerable and we have varied our service to meet their needs, we define that satisfaction with the service we have delivered is a successful outcome. We will seek feedback from vulnerable recipients of our services and make changes where necessary.

7.  **Responsibilities**

7.1 Chief Executive

The Chief Executive, and ultimately the Board, have overall responsibility for the Vulnerable Person’s Policy.

7.2 Director of Operations

The Director of Operations is responsible for the implementation of this policy and associated procedures and is responsible for reporting performance to the Board.

7.3 Head of Housing Operations

The Head of Housing Operations, who with the support of the Housing Operations Team, is the operational lead for the day to day running and implementation of the Vulnerable Customers Policy.

7.4 Employees

Employees have a responsibility to check information on any vulnerabilities, to identify the signs of vulnerabilities, ensure this information is recorded and to use this information as part of their service delivery.

8. **Governance and Assurance.**

Awaiting outcome of discussion with Board.

9. **Equality and Diversity**

9.1 This policy in itself sets out an approach to how the organisation will consider equality and diversity in the delivery of its services. All involved will recognise their ethical and a legal duty to advance equality of opportunity and prevent discrimination on the grounds of age, sex, sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage, and civil partnership.

10. **Review**

This policy shall be reviewed by the Head of Housing Operations triennially.

11. **Publicising this Policy.**

The Vulnerable Customers Policy will be publicised on the Arches Website.