

<b>Vulnerable Person's Policy</b>		<b>Policy Reference:</b>
<b>Lead Department:</b>	<b>Housing</b>	<b>Approval Date: April 2024</b>
<b>Approved by:</b>	<b>Executive Team</b>	<b>Review Date: April 2027</b>
<p><b>This document applies to the following areas of New Outlook's Business</b></p> <p>This policy relates to all parts of New Outlook's operations. It applies to all sites and offices operated by New Outlook and includes communities and people's homes visited by any of our employees, board members or contractors.</p>		
<b>Appendices/forms:</b>		

## SCOPE

The policy sets out New Outlooks commitment to supporting vulnerable person's and tenants to ensure that they have access to our services, are supported to keep safe and well, and that they receive the support they need to sustain their tenancy. The policy applies to those individuals to whom may not meet the definition of a person with care and support needs under the provision of the Care Act (2015) but whom might be considered vulnerable and 'at risk' without support. The policy focuses on tenants who are deemed to have the capacity to make their own decisions but whose circumstances increase their sense of vulnerability or where they are at risk of harm, exploitation, harassment, abuse or crime.

New Outlook provides a range of additional support and responds to tenants facing circumstances that can make them feel vulnerable and unable to cope or manage their tenancy. This policy sets out the actions we can take to support them to achieve this.

New Outlook recognises that the term 'vulnerable' is contested and value laden. It is used in this policy to describe the circumstances and factors that contribute to the person's sense of vulnerability rather than used to describe the person themselves or to stigmatise, judge or label the person.

## POLICY STATEMENT

Describe the policy and the reason for the policy.

The objective of this policy is to ensure that our tenants receive the support and assistance they require to manage their tenancy. To achieve this, we aim to:

- Consult and involve people in discussions around vulnerability and to engage them in how best to provide support and assistance
- Use all information available to identify if a tenant should be considered as vulnerable
- Record all vulnerability factors on the person's record and keep this up to date, including the person's own account
- Take account of known vulnerability factors in the provision of services and in decisions around tenancy management and enforcement

- Assist vulnerable people to access additional services that they may need
- Record any known representatives who advocate for the person or whom may have power of attorney to act on a person's behalf
- Consider any additional needs arising from the person's circumstances and where appropriate make adjustments to our service delivery to ensure the vulnerable person continues to receive an appropriate and proportionate level of service
- Signpost the person to other agencies, services and community resources where appropriate and based on individual needs
- Refer to statutory agencies where appropriate
- Make safeguarding referrals to other agencies as appropriate

## TERMS AND DEFINITIONS

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION
Vulnerability	Used to describe a set of circumstances, experiences and factors that result in the person feeling at risk, unable to cope and in need of additional support. Vulnerability is not a fixed or permanent state and is changeable based on circumstances and external influences. The factors considered are multiple and include: age, disability, health, bereavement, mental health, substance use, domestic abuse, poverty, care experienced. These factors are not exhaustive or weighted and it is frequently the interaction of multiple factors that influences a person's sense of vulnerability. Self determination is also a consideration, with people experiencing specific factors not defining themselves as vulnerable.
Delegated authority	A person identified to represent the person's interests or advocate on their behalf. A person with delegated authority may be a friend, family member or support worker. They do not have legal standing to make a decision on a person's behalf or in their best interests for those people who may be deemed to lack capacity to make a specific decision.
GDPR	General Data Protection Regulations 2016

## POLICY SECTIONS

### 1. Legal Duties and Regulatory Responsibilities

New Outlook has a duty under the Equality Act (2010) to advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share that characteristic. As a housing association, we recognise that our tenants can be considered vulnerable for reasons other than the characteristics protected under the equalities legislation, and this policy sets out how we define vulnerability and how we aim to respond to those individual needs.

The Social Housing Regulator's Tenant Involvement and Empowerment Standard requires registered providers to 'treat all tenants with fairness and respect' and 'demonstrate that they understand the different needs of tenants, including in relation to the equality strands and tenants with additional

support needs' with a specific expectation that providers will 'demonstrate how they respond to those needs in the way they provide services and communicate with tenants'.

The Housing Ombudsman Complaints Handling Code 2020 states that landlords should comply with the Equality Act 2010 and may need to adapt policies, procedures and processes to accommodate an individual's needs.

New Outlooks responsibilities for safeguarding vulnerable adults is set out in our Group Safeguarding Policy and Procedure.

## 2. Identifying Vulnerability Factors

Individual vulnerability factors may be identified by:

- A person when they are applying for housing or in contact with us;
- Any member of New Outlook staff who has direct contact with the person, either in person, on the phone or through any other form of communication
- Our contractors
- A family member or representative of the person
- A referral from an external agency or organisation

Our staff should be aware of the possibility that a person may be vulnerable, such as from information they receive from a third party or from their own observations during routine work.

New Outlook staff delivering services to people will have training so that they can recognise potential indicators of vulnerability factors, such as:

- Anti-social behaviour as a result of mental health issues
- Experience or exposure to anti-social behaviour, harassment, hate crime or domestic abuse
- A repeated reluctance to engage or respond to correspondence or to answer the door when visited
- Self neglect, hoarding or other behaviours that result in the person's home or property becoming damaged, neglected, unsafe or otherwise unfit for occupation
- Erratic rent payments and falling into arrears when the person had previously had a good history

We do not take a generalised approach to define groups of people as vulnerable on the basis of a specific characteristic and our staff do not assume that a person is deemed vulnerable because of particular characteristics. Instead, we take a professional curiosity approach to assessment to understand vulnerability factors and individual circumstances.

## 3. Recording Vulnerability Factors

New Outlook will record on the person's record any known vulnerability factors, any specific communication or access needs and whether there is anyone with delegated authority or power of attorney to speak to us on the person's behalf. Recording this information will enable New Outlook to make appropriate arrangements to ensure communication is effective and open and so that we can make reasonable adjustments to how we deliver support. All information will be kept in accordance with our General Data Protection Regulations Policy.

In line with our Safeguarding Policy and Procedure, we will share information with the relevant safeguarding agencies in order to keep vulnerable adults and children safe and protect them from harm.

#### 4. Provision of Services

As part of our service delivery, we provide support and signposting for vulnerable tenants in addition to a clear safeguarding referral process. Where a tenant is identified as vulnerable, they can be assessed for further advice and support to achieve their outcomes, keep themselves safe and to sustain their tenancy.

The delivery of service will be personalised and proportionate based on individual needs. Examples of services will be:

- Welfare benefits advice and support
- Signposting to other organisations and agencies
- Advice and signposting on how to access to aids and adaptations, including making referrals to the relevant agencies
- Guidance on how to keep safe and to maintain a safe environment
- Health and well-being checks
- Information on how to access to social and leisure opportunities
- Signposting to access dept management advice and support to manage finances

We will adapt the way we provide support in order to respond to people's individual needs. Examples of how we will do this include:

- Provide information and correspondence in a range of formats, including braille, easy read and other languages
- Allowing longer for people to answer the door when we call for an appointment
- Arranging visits and appointments at specific times
- Visiting in person when we would generally provide a phone service
- Explain information clearly and check understanding
- Consider a range of action to address issues relating to anti-social behaviour or rent arrears as an alternative to formal enforcement action

#### 5. Communication

The communication needs of a person are assessed and recorded when they attend the tenancy sign up and reviewed at other opportunities during their tenancy.

We will arrange for translation and interpreter support, as appropriate to assess a person's needs. This includes British Sign Language interpreters.

We will also make documents available in other languages and formats such as large print, audio or easy read formats.

Tenants can also be accompanied by an advocate, representative or person with delegated authority to support effective communication.

## 6. Lettings

When allocating our properties, we will review any information we receive relating to vulnerability factors to help us to ensure any offer of housing is appropriate to the individual and their family. This information will be treated in accordance with our GDPR policy.

The prospective tenant, in deciding to enter a tenancy agreement must be able to understand:

- Their obligation to pay rent as a tenant, and to occupy and maintain the property
- The landlord's obligations to maintain the property
- That failure to keep to the terms of the tenancy agreement may mean they could be evicted

New tenants will be given the opportunity at the tenancy sign up to tell us about their needs and any vulnerability factors, alongside identifying any existing care and support services they receive. Where appropriate, we will facilitate referrals to other agencies for further support and advice, alongside our own service provision.

## 7. Rent Arrears

All tenants must pay their rent on time and we will advise and support those who are struggling to make these payments. We recognise that people's circumstances may mean that they have other financial challenges and difficulties with budgeting. We will refer tenants to other services to support with managing their financial affairs, for debt management or welfare rights advice to maximise their income. We will agree a realistic plan with people to repay their rent and arrears based on their personal circumstances.

## 8. Repairs

New Outlook recognises that due to vulnerability factors and individual circumstance, that some tenants may find it more difficult to cope if something goes wrong in their home and needs a repair. The person's circumstances will be considered both as part of reporting the repair and with planning for a contractor to visit to complete the repair. Adjustments can be made as a way of facilitating the repair without disruption or distress to the person.

## 9. Anti-Social Behaviour

New Outlook recognises that some individuals may act in an anti-social way due to behaviours relating to vulnerability factors. We will make efforts to engage them to offer relevant support services to improve the situation before taking any tenancy enforcement action. However, we must balance the safety and well-being of our other tenants in order to consider the most appropriate and proportionate response. We will not tolerate anti-social or aggressive behaviour to our staff and we will make arrangements to ensure the safety and well-being of our staff in those circumstances. We will also review lone-working arrangements in these circumstances as part of a risk assessment. New Outlook will review risk assessments on a regular basis and make adjustments as necessary.

## RELATED POLICIES AND OTHER REFERENCES

Safeguarding policy and Procedure  
Complaints procedure  
Mental Capacity Act Policy and Procedure  
Lone Working Procedure  
Aids and Adaptations Policy  
GDPR Policy

## ROLES AND RESPONSIBILITIES

List the job titles and business offices directly responsible for the policy.

ROLE	RESPONSIBILITY
Executive Team	To monitor and review the implementation of this policy and to consider the implications and trends from implementation
Senior Housing Manager	To oversee the day to day implementation of the policy. To identify trends and practice arising from implementation to report to the Executive. To ensure that our employees have the knowledge, skills and systems to provide an appropriate response and to be able to implement the policy effectively.
Housing Team	To be able to implement the policy and ensure their knowledge and skills are up to date to be able to respond appropriately. To assess and record the needs of vulnerable people in line with the policy.
Supported Living Managers and Staff	To ensure that they have the knowledge and skills to be able to respond to the needs of vulnerable people appropriately. To assess and record the needs of vulnerable people in line with the policy.