



# Vulnerability Policy

## 2022

Appendix 5

# Contents

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	Page
Introduction	1
Objectives	1
Definition of vulnerable	2
How MDH identifies vulnerable tenants	3
What MDH does when a tenant is identified as vulnerable	3
How MDH can support vulnerable tenants	3
Support that MDH can offer	4
Children and vulnerable adults	5
Mental capacity	5
Reasonable adjustment	5
Monitoring and review	6
Equality impact assessment	6

## 1. Introduction

- 1.1 MDH aims to ensure that everyone has the opportunity to access and benefit from our service. MDH realises that for some service users who may be vulnerable, barriers can exist which may prevent participation.
- 1.2 The Regulator of Social Housing's Tenant Involvement and Empowerment Standard, requires us to "provide choices, information and communication that is appropriate to the diverse needs of (our) tenants" and to "demonstrate that (we) understand the different needs of tenants, including in relation to the equality strands and tenants with additional support needs."
- 1.3 MDH is committed to making sure our services can be easily accessed by tenants with complex and/or additional needs.
- 1.4 The policy also defines what a 'reasonable adjustment' is, in what type of circumstances they will be carried out and how a request for a reasonable adjustment can be made.
- 1.5 This policy does not aim to explain how we will approach every circumstance where a tenant with complex needs requires a service to be adjusted. It is a general statement of our commitment to ensure tenants with disabilities are not at a disadvantage when accessing MDH services.

## 2. Objectives

- 2.1 This policy sets out to achieve the following:

- How vulnerable adults are identified
- How vulnerable adults can access services from MDH
- How MDH can adapt its services to meet the needs of vulnerable people
- Signposting
- MDH's approach to reasonable adjustments

At MDH, one of our objectives is to ensure that our vulnerable tenants receive the services and assistance they require to sustain their tenancy. To achieve this, we aim to:

- Identify a tenant who may have a vulnerability and/or support need
- Record any vulnerabilities on housing management system
- Use all available information to identify if a tenant is vulnerable
- Take account of known vulnerability factors in the provision of services and in decisions around tenancy management and enforcement
- Assist vulnerable tenants in accessing additional services that they may need.
- Record any known representatives who act as a 'delegated authority' or with power of attorney or other care givers who may act on the tenants behalf
- Consider any additional needs due to the vulnerability and where appropriate vary our service delivery to ensure vulnerable residents still receive the same level of service
- Make appropriate referrals to tenancy sustainment services, such as CHAT (Churches Housing Action Team) or support agencies, based on our local knowledge of resources and the needs of the tenant, where appropriate to do so
- Make reasonable adjustments when a request is made and justified (see section 10).

### 3. Definition of vulnerable:

- 3.1 Vulnerable means any individual who is, or may be, in need of help or support due to mental health difficulties, disability, age, illness or frailty and who are, or may be, unable to look after their home and/or their wellbeing or unable to protect themselves from harm or exploitation by others.
- 3.2 For the purposes of this policy, MDH will define vulnerable as a tenant who requires an enhanced housing service (for example correspondence in a different language or large print, or where signposting to other services is necessary). This definition does not replace statutory definitions.
- 3.3 MDH has due regard to tenants who may have specific requirements, these include, but are not limited to:
- Tenants with sensory impairments, such as visual impairment, deafblind and hearing impaired
  - Tenants who do not have English as a first language
  - Tenants who are socially isolated or lonely
  - Tenants whose disabilities limit their physical mobility
  - Tenants with learning disabilities
  - Tenants with mental health problems
  - Tenants who are frail or elderly
  - Tenants who have alcohol or substance misuse problems
  - Tenants who are experiencing domestic abuse or harassment
  - Tenants who lack capacity to make decisions (under the Mental Capacity Act 2005)
- 3.4 A tenant may be vulnerable as a result of a single problem or condition, or due to a combination of factors. Vulnerability can also occur at different points in a person's life, for instance someone may need support following bereavement for a temporary period, whereas another may require support permanently.
- 3.5 This policy does not assume that whole groups of people are vulnerable. For example, it is not correct to assume that all older people are vulnerable or that all disabled people are vulnerable.
- 3.6 There are a number of signs that someone may be vulnerable. These may include, but are not limited to the following:
- Falling into rent arrears or other debt problems
  - Issues with maintaining the tenancy
  - Being the victim, or perpetrator, of anti-social behaviour, hate crime or harassment
  - Disputes with neighbours
  - Damage to the person's home
  - A detrimental change to a person's physical appearance
  - A failure to respond to correspondence or to answer the door when visited
  - Self-neglect, hoarding or other behaviour which results in the person's home and/or garden becoming damaged, neglected or otherwise unfit for occupation

## 4. How MDH identifies vulnerable tenants

- 4.1 When a tenant contacts Mid Devon Housing, this presents an initial opportunity to identify whether they are vulnerable. A tenant can become vulnerable at different stages of their lives, it is essential that identification of vulnerabilities is not just at first contact, but throughout a tenancy and whenever contact is made.
- 4.2 MDH is able to identify vulnerabilities in a number of ways:
  - Reviewing any support needs or vulnerabilities identified in a Devon Home Choice application form
  - At the sign up stage for a new tenant and upon completion of the vulnerability questionnaire
  - During home visits
  - Reports from relatives or care givers
  - Reports via a support agency or another external agency such as police or probation.
  - Local knowledge gathered or observed through day to day housing management activities e.g. neighbourhood walkabouts, tenancy home checks, through tenants reporting a repair and the operative picking up a vulnerability and/or support need, or as a result of a breach of tenancy.

## 5. What MDH does when a tenant is identified as vulnerable

- 5.1 When a tenant is identified as vulnerable (according to the MDH definition), the officer will look at ways to support the tenant (some of which referenced below in section 6)
- 5.2 The tenant's record on the housing system will be marked with a warning flag (UDC) with the nature of the vulnerability and how the tenant needs to be assisted (e.g. needs letters sent in large print).
- 5.3 Monthly reports are produced, on warning flags and these are checked by the neighbourhood officers to ensure the data we have is up to date and accurate.
- 5.4 At the sign up stage, the tenant will be asked whether they have any support needs and/or any communication preferences.
- 5.5 These will be recorded onto our internal systems and will be used in order to meet the tenant's specific needs throughout the duration of their tenancy.
- 5.6 We will proactively check that we have the appropriate support flags and communication preferences recorded on our systems, where information is missing or requires updating.

## 6. How MDH can support vulnerable tenants

### 6.1 General signposting and referrals:

- 6.2 When a Housing Officer or another member of staff identifies a vulnerable adult they will seek to signpost or refer the person to appropriate support if it is needed. Some of the services signposted or referred to may include for example:
  - GPs and other health services
  - Mental health services
  - Adult Social Services (for care and support services or safeguarding)
  - Tenancy sustainment support
  - Occupational Health

- Substance misuse services
- Domestic abuse services
- Debt advice and welfare benefit services
- Advocacy services

6.3 MDH recognises that carers, who are caring for vulnerable people in a voluntary capacity (e.g. partner, relative or friend), may also need support in fulfilling their responsibilities and in looking after their own wellbeing. Carer's can be signposted, wherever appropriate.

#### 6.4 **Communication:**

6.5 MDH communicates with its tenants or service users in a variety of different ways:

- Face to face, which includes: home visits or booked office appointments
- Phone
- Letters
- Newsletter
- Email
- Texts
- Social media
- MDDC Website

6.6 In accordance with the MDDC's Equality and Diversity Policy, documents are available in other languages, braille, large print and audio tape and all officers will provide assistance to complete forms when requested.

6.7 Tenants can also ask that correspondence is sent to someone who will act on their behalf. Telephone and face-to-face language interpreting and British Sign Language interpreting services can also be provided upon request.

6.8 At the sign up stage, the tenant will be asked whether they have any support needs and/or any communication preferences (questions are posed in the vulnerability checklist) but also at other opportunities during their tenancy. This ensures that the Housing Service can communicate with the service user in the best way possible and in a way that is tailored to their individual needs. These will be recorded onto our internal systems and will be used in order to meet the tenant's specific needs throughout the duration of their tenancy.

6.9 We will regularly check that we have the appropriate support flags and communication preferences recorded on our systems, and will regularly check that the information we hold is up-to-date.

## 7. Support that MDH can offer:

- Identifying any support needs or requirements at sign up stage and completing referrals where necessary
- Updating the housing management system with a UDC flag if the tenant has a support need or a requirement for an enhanced service
- Post sign up check – usually 6 weeks after the tenant has moved in
- Offering Lifeline alarm services for a charge
- Providing housing advice

- Provide aids and adaptations to promote independent living, requested through a Disabled Facilities Grant (DFG) in accordance with the Aids and Adaptations Policy
- Providing additional security through the Sanctuary Scheme for tenants who are survivors of domestic abuse and wish to remain in their current home
- Offer referrals to Devon Mediation Service where there are identified neighbour issues.
- Installation of gas or electric cooker connections can be provided by MDH, charged at a competitive rate.

## 8. Children and vulnerable adults

8.1 MDH has a duty to protect children and vulnerable adults. Where it is brought to the attention of MDH that a child or adult may be at risk, Officers will refer to the Council's Safeguarding Children and Vulnerable Adults Policy. When and if appropriate, Officers will signpost or refer cases to other agencies.

## 9. Mental Capacity

- 9.1 The Mental Capacity Act (2005) provides the legal framework for acting and making decisions on behalf of people who lack mental capacity to make decisions for themselves.
- 9.2 When MDH identifies a tenant who does not have mental capacity to make decisions, MDH will work in line with the [Mental Capacity Act Code of Practice](#) to ensure tenants are able to access our services.

## 10. Reasonable Adjustment

10.1 A reasonable adjustment involves making a change to the way that we usually do things to ensure that we are fair to all of our tenants. This may involve departing from our usual practice in the way we do things if we find that the current position places that person at a substantial disadvantage. For example we would:

- Allow more time for someone to respond or provide information; or
- Make sure our office buildings do not present obstacles for disabled people, for instance by providing lifts or ground floor meeting rooms; or offer a suitable alternative locations
- Provide information in large print or alternative language
- Allow for more time to answer the door if someone has mobility issues

### 10.2 How do MDH define 'reasonable'?

10.3 The Equality and Human Rights Commission suggests the following considerations when we decide whether an adjustment is 'reasonable' or not:

- How effective the adjustment(s) will be in assisting a customer with a disability and in preventing or reducing the possibility of them being at a disadvantage;
- The practicality of making the adjustment(s)
- The cost of the adjustment(s) and whether this is possible within our resources; and
- Any disruption to the service that making the adjustment(s) may cause.

10.4 A reasonable adjustment can be requested from MDH in the following ways:

- In writing, explaining what the adjustment is and why it is needed

- By telephoning, writing or emailing in to the MDH service
- By referral from a support agency or external agency
- By a family member when we have been given permission for them to do so; and or
- A member of staff may suggest for one to be made, when they are aware it will support the tenant's needs.

## **10.5 Reasonable adjustments to our complaints process**

10.6 We will make reasonable adjustments to our complaints service where necessary, ensuring tenants with a disability are not at a disadvantage when accessing the service.

10.7 Examples of the reasonable adjustments we will make are:

- Using the customer's communication preference throughout the duration of the complaint;
- We will not request a complaint to be made in writing where this presents a barrier or disadvantage to the customer due to their disability or additional needs;
- Extension of any time limits (where it is lawful to do so); and
- Provide information in alternative formats eg. Braille, large print or on coloured paper.

10.8 In the circumstance where we are unable to make a reasonable adjustment due to cost or resources, we will work together with the tenant to find the most appropriate alternative solution for them.

10.9 If a tenant is dissatisfied with the arrangements or decisions we have made regarding a reasonable adjustment, we will respond in accordance with our Complaints Policy.

## **11. Monitoring and Review**

11.1 This policy will regularly be reviewed in line with legislative and regulatory changes and best practice.

## **12. Equality Impact Assessment**

12.1 MDH complete an equality impact assessment each time we develop or review a policy, procedure or service. The assessment is to help us make sure our decision making is fair and does not present any barriers or disadvantage to customers from any protected group (including disability) under the Equality Act 2010.