



Title:	Supporting Customers Policy
Person responsible:	Head of Neighbourhoods
Customer consultation arrangement:	Feedback gained through Customer First Engagement process
EIA required:	Yes
EIA completed (date):	03/12/2024
Approved by:	SMT and Director of Customer Experience
Business Strategy Objective	Transforming
Approval date:	26/11/2024
Links to other key policies or strategies:	Safeguarding Vulnerable Adults and Children at Risk Policy, ASB Policy, Adaptations Policy, Domestic Abuse Policy, Complaints Policy, Tenancy Management Policy, Damp and Mould Policy, Resident Engagement Strategy, Good Neighbourhood Management Policy, Responsive Repairs Policy, Cumbria Choice Based Lettings Allocations Policy, Equality Diversity and Inclusion Policy, Customer Experience Strategy, Asset Management Strategy, Building Safety Policies, Unacceptable Behaviour Policy, Data Strategy, Data Protection and Data Privacy Policy.
Review date:	January 2028

Document management		
Version	Date amended	Amendments
1	N/A	New policy introduced

1. Introduction

1.1 South Lakes Housing (SLH) is a registered provider (housing association) and was formed in 2012. We own and manage approx. 3500 homes across a wide geography in South Lakeland and Lancashire. SLH is committed to providing excellent services, creating safe and sustainable communities and promoting pride in its neighbourhoods.

1.2 SLH will co-operate with relevant partners such as the Local Authority, Police and other relevant agencies to promote social, environmental and economic wellbeing in the areas where we provide social housing. Our approach will take into account our strategic objectives, views and diverse needs of our customers and our presence within the area.

1.3 SLH recognises that all of our customers have their own individual needs but that some, depending on their circumstances will need our support in applying for a

tenancy and sustaining a tenancy whilst being able to enjoy their new home and access relevant services.

1.4 SLH is committed to ensuring that our working practices and services meet the diverse needs of our customers, and particularly for those with disabilities or those with temporary or short-term conditions who might otherwise be disadvantaged. In meeting this objective, we will make reasonable adjustments to our services. These may include alterations to premises, amendments to policies and procedures or provision of alternative means of communication methods to suit individual needs. In all instances we will seek to ensure that our services are inclusive and can be accessed by all customers who have vulnerabilities or disabilities, as well as those who do not.

2. Defining Vulnerability

2.1 SLH defines 'vulnerable' in relation to the provision of its services as: residents who have a particular characteristic and/or experience an exceptional life event and are currently unable to act independently and/or are unable to manage their tenancy without additional support or reasonable adjustments being in place.

2.2 Our definition reflects our understanding that 'vulnerability' can be a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic violence, poverty etc. The more common characteristics, events and factors we take into consideration when considering a resident's state of vulnerability are included at Appendix 1.

2.3 Some of these factors are a constant and some can be a life event such as bereavement or experiencing domestic abuse which may not necessarily remain a permanent state. It is the interaction of these factors that will determine how vulnerable a person is at any point in time and how much additional assistance they may require to sustain their tenancy.

2.4 An individual's ability to act, engage or cope with everyday activities varies and so is an important factor in considering vulnerability. For example, many older or disabled people are very independent and active and often do not need any additional assistance to sustain their tenancy and remain independent.

3. Scope

3.1 The policy sets out the ways in which SLH will deliver our services by working with tenants, residents, stakeholders, and partner agencies and aims to:

- Develop a pro-active approach to gathering, recording and reviewing information around vulnerabilities, disabilities or accessibility issues.
- Recognising and recording any reasonable adjustments that are required and deliverable as a part of our service offer.
- Ensure that all customers are aware of their respective responsibilities in terms of informing us about any issues they may have and any changes in their circumstances which impacts on their needs if they wish us to take them into account when delivering services.

3.2 The Policy applies to all residents and household members living in properties owned and managed by SLH.

3.3 As a registered provider of social housing, SLH has a duty to make sure that our services are fair and accessible for all our customers. We will make reasonable adjustments and put in place appropriate support mechanisms to make sure all our customers have the opportunity to access and benefit from our services.

3.4 This policy is intended for use by SLH colleagues and is designed to ensure that we meet our legal and regulatory requirements, professional and industry codes of conduct and the ethical standards that we set ourselves as part of our values. This policy will ensure that when colleagues encounter a vulnerable customer, all reasonable steps are taken to minimise the risks of harm to their welfare and that everyone is treated fairly and with respect. We will do this by following this policy and by checking the suitability of staff or the way in which services are delivered.

3.5 We are committed to providing appropriate support to all our customers and this forms part of our wider commitment to making sure our services meet the obligations of the RSH Consumer Standards, Equality Act 2010, Care Act 2014, Social Housing Act 2023 and Housing Ombudsman's Complaints Handling Code.

3.6 Partner agencies and service providers are not required to comply directly with this policy but are expected to have their own policies and procedures in place, which do not conflict with this policy.

3.7 This policy does not override the requirement for our customers to meet their contractual obligations, whichever tenure of home they live in. SLH may use its discretion to adjust our approach in applying our operational policies and procedures to ensure equity for our customers while meeting business obligations.

3.8 The policy does not replace SLH's Safeguarding Vulnerable Adults and Children at Risk Policy. If any Safeguarding issues or concerns are identified, then colleagues must immediately follow SLH's safeguarding processes before taking any further action.

4. Regulatory and Legislative Requirements

4.1 Legal & Regulatory Framework:

- Housing Act 1985
- Housing Act 1988
- Housing Act 2006
- Autism Act 2009
- The Housing Health and Safety Rating System (England) Regulations 2005
- Equality Act 2010
- The Social Housing Act 2023
- RSH Consumer Standards
- The Housing Ombudsman Complaint Handling Code
- The Housing Ombudsman Spotlight Report – A relationship of Equals 2024
- Data Protection Act 2018
- Social Housing (Regulation) Act 2023
- Human Rights Act 1998

4.2 SLH acknowledges its duties under the Equality Act 2010 (the Act). While the Act does not define what is a 'reasonable adjustment,' the Equality and Human Rights

Commission recommends consideration of the following factors in determining what is 'reasonable':

- How effective the adjustment will be in avoiding the disadvantage the customer would otherwise experience.
- The practicality of the adjustments.
- The extent of any disruption the adjustments might cause.
- The financial and other costs of making the adjustment.
- The amount of resources already in place.
- The availability of financial support or other assistance.

5. Our Approach

5.1 Where SLH is notified of a condition or situation disadvantaging a customer, or other household members, we will consider the above and seek to make reasonable adjustments to the delivery of our services. We do not want to set false expectations and promise something we cannot deliver. SLH will review each case based on the facts presented and in full consideration of our Customer Support Policy and Adaptations Policy should there be a need to consider physical adaptations to a property linked to the individuals' circumstances. The way in which we do this is in line with the 3 R's of Recognise, Respond and Record.

5.2 Recognise

5.2.1 The recognition of a vulnerability or need for a reasonable adjustment can present itself in a number of different ways such as, but not limited to those listed below:

- Through the application for housing process, it may become clear that a customer has a particular vulnerability or need for support.
- Through a customer informing us of a change in their circumstances during the life of a tenancy.
- Through a member of staff identifying a possible issue during a conversation with the customer over the phone or during a visit to their home.
- Through information being provided to us through a 3rd party such as a next of kin or a support agency.

SLH colleagues have the means to report and record any instances where, through any given means, a vulnerability is highlighted.

5.3 Respond

5.3.1 SLH will not make assumptions about customer requirements for reasonable adjustments or what those adjustments might be. We will ask the customer or their advocate and endeavour to agree and deliver adjustments in a reasonable and mutually agreeable timescale. However, in specific circumstances there may be a delay while specialist advice is obtained. Where this is the case, SLH will keep the customer updated on progress.

5.3.2 Wherever reasonably practicable, SLH will support customers with reasonable adjustments to support their needs and ensure they have access to all services. Examples of reasonable adjustments are below but this is by no means an exhaustive list:

- Knocking loudly when attending appointments for a customer who may be hard of hearing.
- Waiting longer for a customer to answer the door or the phone if they have a physical disability or may take additional time to move around their home.
- Delivering priority repairs to a particularly vulnerable group of customers such as boiler repairs to those who may be elderly or isolated.
- Communicating through a third party or next of kin in cases where the customer has requested this or if there is a need due to capacity to understand and retain information for example.
- Supporting customers with adaptations, ranging from grab rails to supporting customers with applications for major adaptations such as through floor lifts in line with our adaptations policy.
- Providing additional support such as a sign language interpreter, telephone interpretation, documents in braille or large print
- Using a preferred communication method, such as teams or in person meetings

5.3.3 Should there be a need for safeguarding referrals or for extra welfare visits to be carried out following the identification of a vulnerability or additional need, this will be completed, and the relevant cases created and managed through our internal systems.

5.3.4 Referrals to external support agencies can also be considered and a number of links to local support and advice organisations can be shared with customers should this be appropriate. This signposting to utility agencies priority persons registers is also something we will consider.

5.4 **Record**

5.4.1 We will record all information relating to our customers and their individual needs on our housing management system. Records will be monitored and reviewed at a frequency which is determined to be reasonable in line with the information and the perceived need to review. As some vulnerabilities may be considered temporary, the review period may vary depending on the specific nature of the circumstance or information.

5.4.2 We will complete a Privacy Impact Assessment (and keep under review) and record lawful basis for processing (including special category data) within the Record of Processing Activities (RoPA) and this will be included within the Privacy Notice with reference to opt out arrangements. Regular checks will be completed to ensure data is being recorded and stored correctly.

6. **Implementation**

6.1 To achieve the objectives of this policy, over the next 12 months we will:

- Review how we capture details of a resident's vulnerability in our systems and ensure that staff who need access to the data have it.
- Make sure we have the necessary data fields to record specific requirements or service adjustments as a result of a disability or vulnerability.
- Embed our approach into our service delivery by training our staff involved in delivering services so they know how to respond positively to vulnerable residents' needs. This will be mandatory training and refreshed periodically.
- Assess our services and operational procedures to identify where we can apply further flexibility, variances or prioritisation for vulnerable residents.
- Review all opportunities to develop self-service, allowing customers to update their own personal data including any information around vulnerabilities, disabilities or accessibility concerns.
- Explore the potential for developing criteria for a 'priority resident' status for tenants assessed as particularly vulnerable and what priority service we may be able to offer them as standard e.g. always have in person visits; faster repairs appointments; welfare calls during extreme weather or circumstances such as the pandemic lockdown; or a response to ASB reports regardless of category or threshold.

7. Monitoring and Review

7.1 Compliance with this policy will be monitored by periodic reviews of case records by the relevant manager.

7.2 If someone is dissatisfied with the arrangements, we have made for providing reasonable adjustments, we will respond in accordance with our complaints policy. If necessary, when reviewing our decision, we will seek advice from specific expert disability groups or seek legal advice.

7.3 This policy will be reviewed every three years, or where there have been significant changes to regulation, legislation, operations or best practice to warrant a further policy review.

If you have any questions about this policy, please contact SLH via email at customerservices@southlakeshousing.co.uk

Appendix 1 – Possible factors in determining vulnerability.

The categories below do not list every possible factor as the whole spectrum of who could be regarded as vulnerable at any point in time is wide, but these are the more common factors to take into consideration when considering a resident's state of vulnerability.

Factor 1 - Underlying characteristic (people in these groups may not always require additional support just because of this characteristic)

- Older people (particularly those 75 years or older)
- 16 – 21 year olds
- People with disabilities
- Care leavers
- Lone parents under 21 years old
- Refugees or asylum seekers
- Carers
- Families with disabled children
- Ex service personnel
- Those living with a terminal illness

Factor 2 - Ability to act, engage and cope – (people may lack ability to sustain their tenancy because of having one or more of these factors)

- Learning disability
- Mental illness
- Autism Spectrum Disorder
- Permanently impaired mobility or frailness
- Chronic, debilitating health conditions
- Addiction / serious substance or alcohol abuse
- Low level of literacy
- Low or no English language skills
- Age related conditions that impact on independent living

Factor 3 - Exceptional life event (people may not have factors 1 and 2 but may have recently experienced an exceptional or traumatic event, and so may be vulnerable at this point in time)

- Recent history of street homelessness
- Recently moved from supported accommodation to independent living
- Bereavement following the death of a partner, child or other close relationship
- Having recently left care as a young person
- Sexual or racist abuse or serious harassment or other hate crime
- Recent experience of domestic abuse
- Living in or recently left a refuge or homeless persons hostel

- Recently discharged from hospital or other institutional care
- Periods of sustained physical or mental illness at home
- Multiple debts and unable to meet basic needs e.g. fuel or food poverty
- Pregnant women
- Ex-service personnel returning from an area of conflict
- Recently given birth, still born or miscarried
- Recently released from prison after a custodial sentence
- Families with children excluded from school