

General Needs Vulnerable Residents Policy	
Approved by Chief Executive	Issue number 1
Approved date August 2024	Review date August 2026
Previous Version N/A	Responsible Officer Head of Housing

1.	Aims and Objectives
	<p>This policy sets out Hightown's commitment to identify and assist vulnerable customers, ensuring they can access our services and receive support where needed to access Hightown's services, sustain their tenancy and live independently.</p> <p>To achieve this, we aim to:</p> <ul style="list-style-type: none"> • Identify and record resident vulnerabilities on the contact management system and tenancy summary and save any associated documentation on file. Ensuring that any changes are updated. • Review information and documentation provided by the resident and any third parties to assist with identifying where a resident is vulnerable. • Record contact with a resident that indicates a vulnerability, this may be where a resident discloses a vulnerability, or their conduct or behaviour gives an indication that they may be vulnerable. • Take account of known vulnerabilities in the provision of services and in decisions around tenancy management and enforcement, making reasonable adjustments where necessary and recording these. • Assist vulnerable residents to access Hightown's services and any additional services that they may need. • Record any known representatives who act as a 'delegated authority' or with power of attorney to act on the resident's behalf. • Vary our approach and interactions with vulnerable residents to maintain an appropriate level of service. • Make referrals to the Tenancy Support Team to provide enhanced support where appropriate. • Utilise the resources of external agencies where they are best placed or have a statutory duty to assist • Make referrals to statutory agencies and other external partner support agencies where appropriate. • Make safeguarding referrals whenever needed in a timely manner.

<p>2.</p>	<p>Definitions and Scope</p> <p>For the purpose of this policy a vulnerable resident is defined as one who has a condition, disability and/or has experienced an exceptional life event, which means that without support, intervention or a reasonable adjustment is at risk of abuse, neglect, impact on their wellbeing or their tenancy being at risk.</p> <p>Hightown also recognises that a resident with a disability is not necessarily vulnerable, and we also understand that a vulnerability is not always permanent and can be influenced by multiple factors and experiences such as age, disability, bereavement, mental health, and domestic violence.</p> <p>Some of these factors are a constant and some can be a life event such as bereavement or domestic violence that does 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 access services and sustain their tenancy.</p> <p>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.</p>
<p>3.</p>	<p>Policy Statement</p> <p>We expect all of our staff to have an awareness that a resident may be vulnerable. Staff delivering services to residents will receive training to recognise potential signs of a vulnerability such as:</p> <ul style="list-style-type: none"> • Anti-social behaviour (ASB) resulting from mental health issues • Hoarding or self-neglect • Domestic abuse • The resident's home becoming damaged, neglected or otherwise unfit for occupation • Erratic rent payments and falling into arrears when the tenant previously had a good payment history <p>A resident's vulnerability may be identified by:</p> <ul style="list-style-type: none"> • Residents when they apply for housing or contact us, or self-refer • Any member of Hightown staff or contractor who has contact with residents in person, on the phone or through any other channel of communication • A referral from an external agency or organisation. • From information Hightown staff receive or from their own observations during routine work such as home visits or ASB interviews. <p>For each service that we deliver we will consider what additional support and / or reasonable adjustment(s) may be required and appropriate for a vulnerable resident.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Making sure that correspondence is provided in an appropriate language / format. • Reviewing the contact preferences on the tenancy summary page on Hoogle before making contact • Working collaboratively with support services • Referring and / or signposting residents for appropriate advice and / or support, following up on referrals as required.

	<p>A reasonable adjustment may include, but is not limited to:</p> <ul style="list-style-type: none"> • Engaging with a translation or interpretation service • Sending written communication in large text or braille • Allowing longer for a resident to answer the telephone or come to the door. • Offering a mediation referral • Carrying out a public duty equality assessment when considering legal enforcement action. <p>Where a resident has been assessed as not having capacity or is believed to lack capacity to make decisions Hightown will work with their appointed representative or make a referral for support to a third party such as the Local Authority, Social Services or General Practitioner.</p> <p>Hightown recognises that the circumstance, preferences and needs of each person are different. Where we are able, we will try to adjust services to meet the needs of an individual.</p> <p>Hightown may sometimes deem it necessary to take legal action against a resident we know or suspect to be vulnerable. Where legal action against a vulnerable resident is being considered, this will proportionate, we will have a legitimate aim and it will be after appropriate offers of assistance and support have been made.</p>
<p>4.</p>	<p>Legal/Regulatory Background</p>
	<p>Hightown has a duty under the Equality Act 2010 (Section 8 – Protected Characteristics) to ensure that there is equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.</p> <p>The Social Housing Regulator’s Transparency, Influence and Accountability Standard requires social landlords to treat tenants and prospective tenants with fairness and respect and take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants.</p> <p>Hightown needs to be able to demonstrate how we respond to support needs based on the way we provide services and communicate with tenants.</p> <p>Hightown needs to also consider the Housing Ombudsman's Complaints Handling Code 2024, which states that landlords should comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs, making reasonable adjustments and having a policy in place to address this.</p> <p>Other associated legislation and regulation includes, but is not limited to:</p> <ul style="list-style-type: none"> • Equality Act 2010 • Human Rights Act 1998 • Data Protection Act 2018 • Housing Act 1985 • The Mental Capacity Act 2005 • Care Act 2014 • Pre-Action Protocol for Possession Claims by Social Landlords