



VULNERABLE PERSONS POLICY

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Where this policy affects	General needs		X	Supported		X	Office / staff base		X

VULNERABLE PERSONS POLICY

1.0 INTRODUCTION

- 1.1 Almond Housing Association Limited (AHA Ltd.) aims to maintain balanced and sustainable communities. We believe that a strong community benefits from the inclusion of, and responds to the needs of, all its members, including those who are vulnerable. We recognise AHA Ltd. has a moral responsibility to do what we can to ensure that vulnerable people are able to enjoy a good quality of life and to live as independently as possible.
- 1.2 In this context, **independence** is created by someone having assistance and support when and how they require it. It is not linked to the physical or intellectual capacity of a person to care for themselves without assistance.
- 1.3 Addressing the needs of vulnerable people is also a key business requirement. Many of the risks faced by our vulnerable customers are passed on to AHA Ltd., e.g. through disruption to rental income and increased tenancy turnover. A sustained tenancy will always be more cost effective than a homeless or crisis situation requiring intensive, expensive emergency support.
- 1.4 AHA Ltd. must ensure that all tenants fulfil the conditions of their tenancy agreement (i.e. pay the rent, keep their property in good condition, be respectful neighbours etc.) and we will take action if they do not do so. Being vulnerable does not reduce a tenant's responsibilities in these areas. However, we recognise that some tenants will require additional support in meeting their obligations. AHA Ltd. aims to help tenants to sustain their tenancies and to minimise instances of tenancy breakdown. Taking action to evict someone will always be a last resort.
- 1.5 AHA Ltd.'s Vulnerable Persons Policy is an over-arching policy applied across our business. It informs our policy and approach to duty of care and safeguarding, and to assessment and support planning. It is the responsibility of all employees, Managers and Board Members to be aware of how vulnerability might act as a barrier in terms of customers accessing and receiving services and to identify how their own area or function might work better for vulnerable people.
- 1.6 This Policy supports and is compatible with AHA Ltd.'s Equality & Diversity Policy, which underpins all we do.
- 1.7 While this Policy focuses on our tenants, AHA Ltd. also recognises our responsibility to other stakeholders and employees.

2.0 RESPONSIBILITIES

2.1 Board of Management

- To ensure that there is in place a Vulnerable Persons Policy which complies with current regulations, guidance and good practice.
- To monitor compliance with the Policy.

2.2 Management

- Director of Housing Management:
 - To manage the implementation of the Policy and related policies and procedures on a day-to-day basis, advising Board Members, other Directors, wider management team and all employees as required on specific matters.
 - To ensure relevant employees have the necessary skills and knowledge to recognise when support or assistance is required and to know how best that may be provided.

2.3 Employees

- To ensure they have read and understood the Policy, that they implement its principles in the course of their interaction with tenants, their households and other stakeholders. In particular that they have the knowledge and skills to recognise when support or assistance is required and how this may best be provided.

3.0 WHO IS VULNERABLE?

3.1 AHA Ltd. considers as vulnerable *anyone who experiences difficulties with everyday living to the extent that they need some additional support to make sure they are not at any disadvantage and /or to sustain the occupancy of their home.*

This definition does not apply just to tenant(s) – we understand the impact a vulnerable family member can have on the whole household.

3.2 AHA Ltd.'s approach does not assume that whole groups of people are vulnerable. For example, we do not assume that all older people are vulnerable even though there may be evidence to suggest that many are. Some categories of people who *may* be vulnerable can be found in the appendix but this is not intended to be exhaustive.

3.3 A person may be vulnerable as a result of a single problem or condition, or due to a combination of factors. It may be because they are isolated from their support network or not coping with their current circumstances.

3.4 Vulnerability need not be a permanent state. People can be vulnerable at different times and for different reasons. For example, a recently bereaved person may be particularly vulnerable for a period following the death. People with recurrent mental health issues may also enjoy long periods when they feel well. AHA Ltd.'s aim is to provide or procure flexible support as and when needed, in the form of advice, sign posting or guidance, for example, money advice, welfare benefits and energy advice services which we may directly contract or provide sign posting to.

4.0 OBJECTIVES

- 4.1 This Policy provides a clear focus for AHA Ltd. by setting out our commitment and approach towards supporting vulnerable people in all aspects of our service planning and delivery.

The specific objectives of the Policy are to ensure that AHA Ltd. has effective arrangements in place:

1. to ensure the equality of the customer experience for all our residents and that no-one is disadvantaged as a result of their vulnerability;
2. to enable our tenancies to thrive and to limit the instances of tenancy breakdown.

5.0 CONTEXT

- 5.1 We remain in a period of financial austerity with significant reductions continuing to be made to public expenditure. At the same time, the UK Government has continued its programme of welfare and housing benefit reform and it is clear that many of the changes are having a negative impact on many vulnerable people and low income families.

- 5.2 Successive Governments have recognised the importance of providing vulnerable people with the right level of support to help them live as independently as possible, as this has been shown to deliver better outcomes and to be cost-effective (e.g. in preventing or postponing the need for more expensive institutional care).

Key national strategies relating to housing, social care, child poverty, disabled people and older people all have the same vision - that all people, whatever their needs, have the right to lead their lives in the same way as any others, with the same opportunities and responsibilities, and to be treated with the same dignity and respect. They and their families and carers are entitled to the same aspirations and life chances as all other citizens.

6.0 PRINCIPLES & COMMITMENT

- 6.1 AHA Ltd.'s approach to supporting vulnerable people will be based on the following principles. We will:

- publicise examples of good service or practice via our web site and social media;
- ensure our actions are informed by maintaining comprehensive profile information (taking into account data protection legislation) about our customers, using this both to tailor services to the individual needs of customers and also to identify trends across our customer base as a whole;
- ensure that 'front line' housing management and maintenance staff are empowered to be flexible in how they provide services, in order to best support vulnerable residents;
- ensure that employees have the necessary skills, knowledge and guidance to deal effectively with the many facets of vulnerability, including training or refresher training (including mandatory e-learning) in mental health awareness, duty of care and safeguarding, multi-agency working, equalities legislation, handling difficult situations, and drug and alcohol awareness;

- seek to identify potentially vulnerable people at an early stage to enable preventative action and timely, targeted support;
- genuinely seek to engage vulnerable customers both in decisions affecting them directly and more widely concerning the services we provide;
- recognise the role of carers, care workers, advocates and other personal representatives, and take their views into account when consulting vulnerable residents;
- comply with relevant legislation, pre-action court protocols and recognised best practice, including in terms of information sharing and data protection;
- promote an environment in which people feel able to raise concerns, complaints or grievances without fear of detrimental treatment, and ensure that we respond responsibly and promptly to issues raised;
- work effectively with appropriate partner agencies to ensure support needs are met and to avoid duplication of service provision;
- promote the aims of this Policy to our employees, customers, stakeholders and the communities we serve;
- regularly review the effectiveness of this Policy, demonstrating measurable outcomes.

7.0 ASSISTING VULNERABLE PEOPLE

7.1 The nature of the assistance provided will depend on the level of vulnerability and the individual's, or the household's circumstances. Some assistance may be provided by AHA Ltd. directly by directly employed staff or contracted staff posts, or via third parties (e.g. Changeworks, on-site Welfare Benefits Officer or Tenancy Support).

7.2 In many cases it will be more appropriate for assistance to be provided by specialist, external agencies following a referral by AHA Ltd. Assistance may be short-term or longer term. Assistance may be time limited with a view to encouraging an individual to alter their lifestyle and/or to gain the skills, motivation or confidence to move on to greater independence.

Assistance provided by AHA Ltd.

7.3 Providing information and help with accessing services, including:

- providing advice and signposting people to other organisations;
- making referrals within Almond Housing Association;
- making referrals to external organisations (see 7.9 – 7.15 below);
- helping with completion of forms and provision of documents e.g. for verification purposes;
- helping with applying for housing.

7.4 Making adjustments to service delivery arrangements

We will use profile and other vulnerability information proactively to inform the way we deliver our services. This may include:

- more regular contact maintained by the Housing Officer;
- agreeing a nominated contact person (e.g. a carer);
- providing information in other formats, where agreed with the customer, that this is the most appropriate means of communication (e.g. translations, interpreters, signers, audiotapes, Braille, large print documents);
- allowing more time for the person get to the telephone or door;
- accelerating repairs for people with particular health and/or vulnerability issues;
- waiving recharges for repairs in certain circumstances, with the approval of a manager;
- requesting housing benefit/Universal Credit payments for some residents to be paid direct to AHA Ltd.;
- providing guidance or possible assistance to maintain the homes and gardens of vulnerable residents who have no other help available to them

7.5 Providing aids & adaptations

This is covered under our Aids and Adaptations processes.

7.6 Work to promote financial inclusion

AHA Ltd. recognises that poverty and debt are more prevalent in social housing than in the general population and are a form of vulnerability. Our Tenancy Sustainment Policy and associated projects, including education and employment programmes, aim to help customers to prevent or reduce debt, manage their money and maximise their incomes.

Our Tenancy Sustainment Team is responsible for examining the impact of Welfare Reform and developing AHA Ltd.'s response to its challenges, including providing employees with the skills to enable them to advise and direct customers appropriately.

7.7 Assistance to specific groups of customers

Working through targeted groups, AHA Ltd. is able to provide support on specific issues e.g. assistance to people who hoard or otherwise need help to maintain the condition of their property. We will work with the WLC Social Work team if required. We will expect there to be engagement and improvement as we will not be expected to help solve the same problem (such as hoarding) repeatedly over the life of the tenancy.

7.8 Support to encourage greater involvement of vulnerable customers

AHA Ltd. strongly believes in the right of all our customers to be involved in the management of their homes, to influence our strategy, policies and service delivery and to scrutinise performance. We will encourage more residents to be involved, focusing on the benefits and impact. We will also review accessibility and barriers to involvement.

Support provided by other agencies – AHA Ltd.'s role

7.9 AHA Ltd. will often not be the most appropriate organisation to provide the necessary support. We will therefore seek to access specialist support services provided by our partner agencies. Our Housing Support Team will be proactive in developing links with advice, support and mediation services, which we are able to access for our customers.

7.10 To ensure the best outcome for our customers, AHA Ltd. will:

- ensure that we seek the customer's agreement, wherever possible, prior to making any referral;
- provide any practical assistance required e.g. completing paperwork and making appointments;
- work to ensure we have effective communication and information sharing arrangements in place with partner agencies;
- monitor the effectiveness of outcomes for the customers we refer.

7.11 Referrals to specialist organisations

AHA Ltd. will ensure housing management staff have a good working knowledge of the availability and remit of support agencies and the referral mechanisms in place. In addition, employees are able to access comprehensive information on organisations which may be able to provide specialist advice and support.

7.12 Referrals for floating support

Where the Housing Officer identifies significant tenancy support needs, beyond that able to be supplied through AHA Ltd.'s housing management service, a referral may be made to West Lothian Council's floating support service.

7.13 Referrals to supported housing

Where a customer's support needs suggest they need accommodation-based support, AHA Ltd. will identify the options available and make a referral to West Lothian Council for assessment for supported accommodation.

7.14 Referrals to social care or health services

AHA Ltd. will identify the options available and make a referral to local Social or Health Services for assessment as appropriate, for example for Vulnerable Adults or Vulnerable Children.

7.15 Tenancy management arrangements for vulnerable people

When seeking possession of a property following the death of a tenant, where there is no legal right to succession, AHA Ltd. will consider the needs of any remaining occupants and may grant a discretionary succession where there are vulnerability issues.

Taking legal action for breach of tenancy by a vulnerable tenant

7.16 AHA Ltd.'s policies and procedures require us to take prompt action in relation to significant breaches of tenancy conditions, such as failure to pay rent and anti-social behaviour. We

recognise that failing to comply with tenancy conditions may be a symptom of an individual's vulnerability and this may result in referring the individual for specialist support.

Employees will be sensitive to the individual's circumstances and use a variety of techniques to resolve tenancy breaches before situations escalate or debts become unmanageable. They will use personal contact, via the support provider or advocate where appropriate, to seek agreement on how matters can be resolved. Any written communication will be to confirm and/or reinforce intentions or agreement, or as a last resort if other methods of contact are not possible.

- 7.17 If agreement cannot be reached on resolving a tenancy breach, we will consider legal action. All pre-action court protocols will be met and evidence recorded to show that we have done all we can to avoid legal action. Prior to legal action against a vulnerable person, account will be taken of the provisions of disability discrimination legislation.
- 7.18 Taking action to evict someone will always be a last resort. AHA Ltd.'s aim is to secure the best possible outcomes for our customer and the surrounding community.

Complaints of anti-social behaviour or harassment made by a vulnerable tenant

- 7.19 AHA Ltd. recognises that anti-social behaviour or harassment may be directed towards a vulnerable individual or household because of prejudices held by a perpetrator. Such prejudices may be targeted for example at:

- people living with physical disabilities, learning disabilities or mental health issues;
- BME residents, asylum seekers or refugees;
- people living with or perceived to be living with AIDS or HIV;
- people believed to be sex-offenders.

8.0 MONITORING THE EFFECTIVENESS OF THE POLICY

- 8.1 Our success in achieving our objectives under this Policy will be measured in the following ways:
- A reduction in the number of evictions, abandonments or otherwise failed or failing tenancies involving a vulnerable person or household.
 - A reduction in the number of cases of anti-social behaviour or harassment involving a vulnerable person (either as victim or perpetrator).
 - Improved outcomes for residents following involvement of internal or external support services.

9.0 FURTHER ACTION AND REVIEW

- 9.1 AHA Ltd. recognises that further action is needed for us to meet fully the objectives of this Policy, and will develop an action plan detailing the initial improvement actions to be implemented.
- 9.2 Progress on the implementation of these actions will be monitored the Senior Management Team and reported to the Board of Management.

10. EQUALITY, DIVERSITY AND INCLUSION

10.1 Almond aims to ensure that equality, fairness, dignity and respect are central to the way we work and how we treat our customers. We support diversity and uphold equal opportunities in all areas of our work as an employer and service provider.

10.2 Almond will not discriminate against tenants, staff, visitors, suppliers or others based on their age, sex, sexual orientation, race, disability, religion or belief, marital status, pregnancy and maternity or gender reassignment (collectively referred to as 'protected characteristics' in the Equality Act 2010).

11. DATA PROTECTION

11.1 Our policies and procedures foster an approach of 'data protection by design and by default'. What this means in practice is that:

- Policies and procedures consider data protection issues, ie how to protect the data subject served by the policy or procedure;
- New systems, services, products and business practices involving personal data are designed and implemented to ensure personal data is protected by default;
- That the Data protection principles and safeguarding of individuals' rights (such as data minimisation, pseudo anonymisation, and purpose limitation) are clear in the policy or procedure;
- And that if the policy or procedure aims to provide service to vulnerable groups (e.g. children) that the personal data is treated with extra protection.

What this requires users of this policy to do is:

- Make sure that staff understand why data protection is important for the implementation of this policy, for instance via training or by reading the data protection policies;
- If we are undertaking a review of the policy, change to process or change to system, that we must consider doing a Data Protection Impact assessment, if the change is likely to result in a high risk to individuals.
- It is also good practice to do a DPIA for any other major project which requires the processing of personal data.

We will consult our data protection officer, if there is doubt over these requirements.

12. POLICY REVIEW

12.1 This policy will be reviewed every three years or as required due to legislative or regulatory change. The review will be completed by the Director of Housing Management and circulated to the Board of Management for approval.

13. ASSOCIATED POLICIES AND GUIDANCE

13.1 This Policy takes account of the following documents:

- Rules of Almond Housing Association
- Equality & Diversity Policy
- Domestic Abuse Policy

14. RESPONSIBILITIES CHART

13.1 The chart below illustrates the responsibilities of all staff in relation to this policy.

	Board	Director of Housing Management	Tenant Support Manager	All Staff
To set the Policy	✓			
To Implement the policy		✓		
Ensure Almond HA employees have an understanding of policy		✓	✓	✓
Policy Review		✓		
Ensure supporting procedures created and monitored			✓	
Ensure Equality & Diversity guidance is adhered to				✓

Appendix

A:INDICATIONS OF VULNERABILITY

It is highly likely that a vulnerable tenant will be receiving or have received support from their GP, Social Work, a care worker or some other 3rd party involvement. We are not seeking to replace this service, merely supplement it.

Examples of people who *may* be vulnerable include, but are not limited to those who:

- have a physical or sensory disability
- have a learning disability
- have mental health issues
- are seriously ill
- are experiencing domestic abuse
- are older
- are single parent families
- are pregnant women
- are unemployed
- are leaving care
- are ex-offenders
- are considered to be financially excluded (including: those below the rent affordability test, caught by changes to welfare reform such as Universal Credit waiting periods, on minimum wage/zero hour contracts etc.)
- have substance abuse problems
- have difficulties understanding, speaking or reading English
- have experienced homelessness / repeat homelessness
- have experienced hospitalisation
- are in periods following discharge from hospital or other institutional care
- experience periods of sustained illness at home
- experience bereavement
- are in a period of change from supported accommodation to independent living
- have evidence of neighbour harassment or abuse toward the individual or household
- provide evidence of anti-social behaviour by the individual or household
- experience divorce or other relationship breakdown
- have arrears of rent or other debt problems

B:Key customer profile information

Age Band	Number	Percentage
Under 18		
18 - 24		
25 - 34		
35 - 44		
45 - 54		
55 - 64		
65 - 74		
75 - 84		
Over 85		
Total		

No. of households with a registered disabled person	Number	Percentage
Registered disabled person in household		
No registered disabled person in household		
No. of residents providing information		

No. of households with a wheelchair user	Number	Percentage
Wheelchair user in household		
No wheelchair user in household		
No. of residents providing information		

Tenant has disability or other health issue /assistance requirement	Number	Percentage
Mobility difficulties		
Mental Health issues		
Deaf/Hearing Impairment		
Learning Disability		
Blind/Partially Blind		
Literacy problems		
Speech Impairment		
Alcohol problems		
Drug problems		
Leaving care		
Unseen disability (e.g. asthma, diabetes)		
Other disability / health issue		
Total no. with a disability or other health issue / support need		

Does the tenant have a carer or support worker?	Number	Percentage
Yes		
No		
Number of residents providing information		

Other assistance needs for the tenant	Number	Percentage
Extra time to get to door		
Large print		
Home visits preferred		
Other support needs		
Interpreter		
One-to-one contact		
Audio tape		
Signer		
Braille		
Total number of tenants with assistance needs		

Does the tenant speak English?	Number	Percentage
Yes		
No		
Number of residents providing information		

Does the tenant read English?	Number	Percentage
Yes		
No		
Number of residents providing information		

Employment status of tenant	Number	Percentage
Full-Time Work		
Part-Time Work		
Retired		
Not seeking work		
Looking for work		
Unable to work		
Doing something else		
Full-Time Student		
Government Training or New Deal		
Number of residents providing information		

Policy Assessment Checklist

Health & Safety Assessment

Does this policy have the potential to affect:

	Yes	No
Lone Working	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Safety and/or wellbeing of customers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Safety and/or wellbeing of staff	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equality Impact Assessment

Does this policy have the potential to affect:

	Yes	No
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage and Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you have answered 'Yes' to any of these points, please complete a full Equality Impact Assessment. If you have answered 'No', you need take no further action in completing an Equality Impact Assessment.

Data Protection Impact Assessment

Carrying out a Data Protection Impact Assessment [DPIA] will be useful to any project – large or small – that:

- Involves personal or sensitive data about individuals
- May affect our customers' reasonable expectations relating to privacy
- Involves information that may be used to identify or target individuals

A Data Protection Impact Assessment [DPIA] must be completed if the policy involves one or more of the following (please tick each that apply to this policy):

Evaluation or scoring	<input type="checkbox"/>
Automated decision-making with significant effects;	<input type="checkbox"/>
<i>Systematic monitoring</i>	<input type="checkbox"/>
<i>Processing of sensitive data or data of a highly personal nature</i>	<input checked="" type="checkbox"/>
<i>Processing on a large scale</i>	<input type="checkbox"/>
<i>Processing of data concerning vulnerable data subjects</i>	<input checked="" type="checkbox"/>
<i>Innovative technological or organisational solutions</i>	<input type="checkbox"/>

- | | |
|---|--------------------------|
| <i>Processing that involves preventing data subjects from exercising a right or using a service or contract</i> | <input type="checkbox"/> |
| <i>Use systematic and extensive profiling or automated decision-making to make significant decisions about people</i> | <input type="checkbox"/> |
| <i>Process special-category data or criminal-offence data on a large scale</i> | <input type="checkbox"/> |
| <i>Systematically monitor a publicly accessible place on a large scale</i> | <input type="checkbox"/> |
| <i>Use of new technologies involving significant innovation</i> | <input type="checkbox"/> |
| <i>Use profiling, automated decision-making or special category data to help</i> | <input type="checkbox"/> |
| <i>Make decisions on someone's access to a service, opportunity or benefit</i> | <input type="checkbox"/> |
| <i>Carry out profiling on a large scale</i> | <input type="checkbox"/> |
| <i>Process biometric or genetic data</i> | <input type="checkbox"/> |
| <i>Combine, compare or match data from multiple sources</i> | <input type="checkbox"/> |
| <i>Process personal data without providing a privacy notice directly to the individual</i> | <input type="checkbox"/> |
| <i>Process personal data in a way that involves tracking individuals' online or offline location or behaviour</i> | <input type="checkbox"/> |
| <i>Process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them</i> | <input type="checkbox"/> |
| <i>Process personal data that could result in a risk of physical harm in the event of a security breach</i> | <input type="checkbox"/> |
| <i>There is a change to the nature, scope, context or purposes of our processing</i> | <input type="checkbox"/> |

If a DPIA is not carried out, please summarise the reasons below