

## VULNERABLE CUSTOMERS POLICY

### 1.0 Policy Summary

- 1.1 Stonewater recognises that some customers may be vulnerable for a number of reasons and is committed to meeting their needs through the provision of suitable accommodation, and appropriate, responsive landlord services.
- 1.2 This policy provides guidance in relation to the definition of vulnerability, and sets out the general approach that Stonewater will adopt in relation to the provision of accommodation and services to customers in such circumstances.

### 2.0 Policy Scope

- 2.1 The policy is tenure neutral and therefore applies to all vulnerable customers.

### 3.0 Policy Objectives

- 3.1 By recognising the potential effect of vulnerability in terms of the design and provision of services to vulnerable customers in line with statutory obligations.
- 3.2 To build and maintain sustainable communities by delivering appropriate support services to vulnerable customers either directly or indirectly through suitably recognised third party organisations. Maximising use of Social Value through contractors, individual and project awards through the Longleigh Foundation and partnerships with regional specialist organisations.
- 3.3 To set out Stonewater's commitment to collecting and recording information relating to customer's vulnerabilities from them and using this to review and modify service delivery.

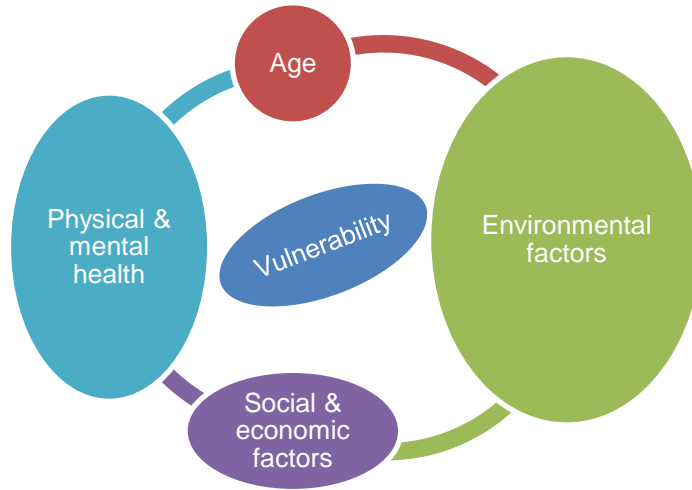
### 4.0 Definition of vulnerability

- 4.1 There is no formally recognised definition of vulnerability. Vulnerability is often used interchangeably with risk or disadvantage and is generally defined as someone who is more likely than the 'average' person to suffer detriment. Age, physical and mental health, social, economic and environmental factors are all examples of factors that can influence an individual's 'risk' in relation to vulnerability.
- 4.2 It is crucial that we do not create too simplistic a concept of vulnerability, capturing obvious factors such as physical or mental disabilities. Some levels of vulnerability may be regarded as situational and make us vulnerable at a particular moment, such as financial stress or temporary illness.

### 5.0 Defining Stonewater vulnerable customer groups

- 5.1 The broad categories used by Stonewater to determine the vulnerability of customers include:
  - Vulnerability in respect to safeguarding

- Vulnerability in the context of protected characteristics - Equality Act 2010
- Situational/temporary vulnerabilities
- Additional risk factors outlined in the following vulnerability risk cycle:



## 6.0 Policy Provisions

6.1 In meeting the objectives of this policy Stonewater will:

- Aim to identify customers and potential customers who are, or may at a later date be more likely to become vulnerable. This will be achieved through a mix of capturing data on commencement of tenancy, customer Census exercises, broader Customer Insight, self-assessments through a self-serve digital platform and through ongoing contact customers may have with staff
- Analyse reasons for tenancy failure in order to identify any linkage to vulnerability
- Develop and participate in customer engagement activities to address a wide range of local needs
- In any situation where a child or vulnerable adult is suspected or known to be at risk of abuse notify the relevant statutory authority immediately in accordance with the Safeguarding policies and procedures
- Where it is identified that an individual does not have the mental capacity to make decisions for themselves, we will work with carers, advocates and legal representatives of customers to ensure they are able to access the services they need in line with the Mental Capacity Act 2005.

6.2 As part of the general approach to vulnerable residents Stonewater will:

- Liaise with appropriate agencies to assist in meeting the needs of vulnerable customers
- Make appropriate referrals to agencies to provide relevant support to vulnerable customers

- Subject to the availability of funding adapt our properties to meet the disability needs of customers and where appropriate, assist them to obtain disabled facilities grants
- Assist customers to obtain disability aids through appropriate agencies
- Assist customers who need translations, interpreters, signers, audio tapes, braille and large print documents
- Comply with relevant legislation in meeting the needs of vulnerable customers
- Ensure that staff are trained effectively in responding to issues of vulnerability, disability awareness and confidentiality
- Recognise the role of carers, advocates and personal representatives and where appropriate will take their views into account when consulting vulnerable customers on issues that affect them

## 7.0 Key Outcomes

7.1 Stonewater will take appropriate steps to identify and record the vulnerabilities of customers and design service delivery processes that where possible meet their needs and requirements.

## 8.0 Equality and Diversity

8.1 We will apply this policy consistently and fairly and will not discriminate against any person on grounds of their race, colour, ethnic or national origins, religion, sexual orientation, disability, gender, age or any other matter that may cause a person to be treated with injustice.

## 9.0 Technical Data

Risk Assessment	This Policy recognises an organisational commitment to collecting and recording information relating to customer vulnerabilities and using this review and modify service delivery
Value for Money	Delivered through existing staff resources and budgetary provision. Maximising use of: <ul style="list-style-type: none"> <li>• Social Value through contractors</li> <li>• Awards through the Longleigh Foundation</li> <li>• Partnerships with regional specialist organisations</li> </ul>
Consultation	Head of Supported Housing, Customer Experience Directorate management team, EDG and Housing Committee as part of a wider engagement in relation to the Vulnerability Project brief and report considered in November 2018.

	The original policy was considered by a customer Sounding Board and Board Designate Committee
Cost. Budget & resources	Delivered through existing staff resources and budgetary provision.
Strategic Group Director	Executive Director - Customer Experience
Policy Lead	Director of Housing Strategy & Quality Assurance
Date of Issue	May 2019 version 2
Date of Next Review	1 May 2022
Committee Review	HC May 2019
Tenant Scrutiny	The policy updates represented minor amends to the original policy.

## 10.0 Author & Version

Author	Joanna Gooch
Title	Director of Housing Strategy & Quality Assurance
Version	V2
Date	17/05/19
Revision	Revision details captured in an accompanying Customer Experience Directorate policy review report.

Version	Date	Name	Description
0.1			Created
1.0	6.1.15		Approved by board
2.0	5.9.17		Reviewed by Housing Committee and confirmed as remaining fit for purpose.
2.1	28.05.19	Joanna Gooch	Minor amendments. Policy previously known as Vulnerable resident policy.