

Policy Delivering Services to Vulnerable People

Version 5 (March 2024)

Delivering Services to Vulnerable People

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Delivering Services to Vulnerable People

1. Introduction

- 1.1 Social Housing providers need to adapt their practices to identify and meet the needs of customers who may be vulnerable, due to their personal circumstances and/or barriers put in place by society.
- 1.2 Living with a disability, illness or diagnosis does not in itself make a person vulnerable. Equally, someone may be vulnerable without a disability, illness or diagnosis. There are several risk factors that may make someone vulnerable, these are explored more in section 4 of this Policy.
- 1.3 The important factor is that if someone's ability to access, use and receive housing services provided Rykneld Homes (RH) is impacted by their personal circumstances, RH will make reasonable and proportionate adjustments to accommodate individual need.
- 1.4 Rykneld Homes will, throughout our business processes, ensure that vulnerable and potentially vulnerable people are identified at an early stage, and receive the appropriate advice and support either through direct service provision or through partnerships with other key providers.
- 1.5 This Policy does not override the responsibilities within the Tenancy Agreement. Vulnerability does not mitigate any of these or indeed any other responsibility, however; RH does recognise that some customers may need support in meeting their obligations.
- 1.6 Training is provided for all staff via not only our customer care training but also training on equality, diversity and inclusion. Each team will have a different approach to delivering services to vulnerable people depending on their service area, this is discussed and defined by each service within their team meetings and one to ones.
- 1.7 This Policy should be read in conjunction with RHs Customer Care and Equality, Diversity and Inclusion Policies.

2. Legislative and Regulatory Requirements

Equality Act 2010

- 2.1 The Equality Act 2010 harmonised all existing discrimination legislation into one Act and contains further range of rights, powers and obligations to help the drive towards equality. RH, therefore, has a legal obligation to ensure services provided do not discriminate against anyone and everyone has fair and equal access.

Public Sector Equality Duty (PSED)

- 2.2 As RH provides public services under the Public Sector Equality Duty (PSED) we are required to have due regard to the need to eliminate unlawful discrimination and advance equality of opportunities under section 149 of the Equality Act 2010. This

applies to all public functions and complements the duties under the Housing Act 1996.

2.3 Rykneld Homes is therefore obliged to take active steps to avoid discrimination and promote equality. The key points under section 149 of the Equalities Act 2010 state a public authority must:

- Have due regard of the need to eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between persons who share a relevant protected characteristic and person who do not share it
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

2.4 Compliance with the duties may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under the Act.

Regulatory Standards for Social Housing Providers

2.5 The Government has given the Regulator, who oversee the practices and viability of social housing providers, two main objectives:

- Economic Objective: to make sure registered providers of social housing are well managed and financially stable
- Consumer Objective: to make sure that tenants get quality accommodation, have choice and protection and can hold their landlords to account.

2.6 To achieve these objectives, the regulator has a set of regulatory standards that contain specific expectations RH must comply with, these are known as the Consumer Standards.

2.7 Consumer Standards:

- Safety and Quality Standard – ensuring the safety and quality of tenants homes
- Transparency, Influence and Accountability Standard – transparency of operations, allowing tenants to have a say and hold landlords to account
- Neighbourhood and Community Standard – creating positive community environments within social housing
- Tenancy Standard – outlines expectations related to tenancy agreements and tenant rights.

2.8 Rykneld Homes will have full consideration towards all these standards when delivering services to vulnerable people.

2.9 Specifically, in relation to delivering services to vulnerable people, RH will:

- Provide choices, information and communication that is appropriate to the diverse needs of our tenants/customers
- Have an approach to complaints that is clear, simple and accessible, ensuring complaints are resolved promptly, politely and fairly
- Understand and respond to the diverse needs of tenants/customers, treating people with fairness and respect
- Understand the different needs of our tenants/customers including in relation to the equality strands and people with additional support needs.

2.10 Failure to meet regulatory and legislative obligations could result in RH receiving complaints from customers who feel they have not been treated fairly in line with the Equality Act 2010, having findings of maladministration against us by the Housing Ombudsman Service, receiving personal claims for damages to be decided by the Courts, being liable for compensation payments (of which are unlimited if found in contravention of the Equality Act 2010 and the PSED).

3. Vulnerability Risk Factors

3.1 Risk factors that indicate a customer may be vulnerable include, but are not limited to:

- Advanced age
- Young age
- Physical disabilities
- Ill-health
- Cognitive impairment, such as dementia
- Mental ill-health
- Learning disabilities
- Sensory impairment
- Acquired brain injury, i.e. caused by a stroke or head injury
- Behavioural disorder
- Neurodiversity, such as autism spectrum disorder
- Psychological or emotional factors, such as stress
- Communication difficulties, including no or limited speech, trouble reading or writing comprehension, English as a foreign language
- Experience of domestic abuse or sexual violence
- Heavy reliance on others (family/friends) for care and support
- Long term drug and/or alcohol abuse
- Exposure to financial abuse
- Poor financial literacy
- Lack of a social network
- Recent care leaver
- Living alone
- Living in poverty
- Adverse life events, such as bereavement
- Dependence on a care provider.

- 3.2 Some people may be affected more than others given similar circumstances. It does not follow that if a person has a risk factor, they are vulnerable, but RH staff will be alert to the possibility and adjust service provision where reasonable to ensure the best possible delivery.
- 3.3 Risk factors may be temporary or permanent or change over time. It is therefore important to review the information held regarding customer vulnerability and service requirements. Therefore, RH will review vulnerability information on customer request and at appropriate intervals to ensure our services remain accessible and service delivery takes account of individual need.
- 3.4 If RH are aware of any risk factors that may require services to be delivered differently, an information marker can be placed on the tenancy. This enables each team to consider their approach to delivering services individual to need and engage with the customer as to the best way of doing so.

4. Support and Reasonable, Proportionate Adjustments

- 4.1 If RH are aware there are possible risk factors which may impact on service access and/or delivery, we will ask the customer to provide any relevant information in relation to the following:

- **Needs or preferences in communicating with Rykneld Homes**

Support may include specific methods of communication or providing letters and appointments in large print. We may need to speak to the customer prior to any written communication is sent to provide notice and an explanation.

- **Assistance required in accessing services**

Support may include having a personal representative present at all home visits, assistance in completing forms, accepting verbal instruction rather than written.

- **Needs in relation to how services are provided.**

Support may include allowing additional time for work to be completed, offering alternative appointment times, having male/female only Officers present when visiting or working in the home, providing other relevant and proportionate services to ensure work can be completed whilst keeping stress/distress of the customer to a minimum.

- **If support is required for them to understand and act upon the information and advice we are giving.**

Support may include referring on to other support agencies such as social care to access care support services, providing information and assistance on welfare and benefit availability.

- 4.2 If there are existing risk factors noted on the tenancy by means of an information marker, where appropriate to do so, staff members will ask if these are still relevant for consideration for the work/service being requested. This assists RH in keeping customer information up to date, relevant and customer led. It is good practice to ask the customer on each contact where visit or service arrangements are being made if

there is anything they would like us to know or consider that may impact on our service delivery.

- 4.3 Family members or carers may also be able to provide helpful information, but RH will seek to discuss the above issues directly with the customer first, unless we have received prior instruction not to by means of a confirmed contact with approved authority to disclose.
- 4.4 If risk factors are present RH will assess if an Equality Impact Assessment (EIA) is required prior to undertaking certain actions such as, but not limited to; tenancy enforcement action, major capital works, responding to formal complaints. This will identify any reasonable adjustments required to service delivery to achieve an objective and will help demonstrate and monitor our compliance with the PSED. A record of the EIA will be saved as part of our tenancy management practice.
- 4.5 If risk factors are present but an EIA is not required, RH will agree what actions are to be taken with our customer or their representative in order to deliver an effective and efficient service for our customer and for RH. A record of this will be placed on our tenancy management system for monitoring purposes and future reference.

5. Data Protection and Confidentiality

Rykneld Homes is transparent about how it uses people's personal data. We do this through a clear and easy to understand Privacy Notice.

All new customers are asked to sign the Privacy Notice when they apply for Housing. This gives consent for RH to use their information to assess their housing circumstances and for entering into the Tenancy Agreement, which is a contract to provide services such as repairs and housing management. When someone becomes a tenant, they sign the [Tenancy Agreement Privacy Statement](#) to confirm they understand how we use their data and they have read and agree to the terms of the Privacy Notice.

6. Contact

Rykneld Homes Ltd
2013 Mill Lane
Wingerworth
Derbyshire
S42 6NG

Tel: 01246 217670

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