



## VULNERABLE PERSONS POLICY

### 1. POLICY STATEMENT

- 1.1 Erimus Housing aims to provide a high level of service and care to its vulnerable tenants and service users when carrying out all of its day to day business activities.
- 1.2 Erimus Housing is committed to developing and providing high quality homes and services that meet the needs of vulnerable people, without losing sight of the importance of ensuring that wherever possible, such people are able to maintain their independence and their freedom of choice.
- 1.3 The main objectives of this policy are:
- To ensure Erimus is able to respond efficiently and effectively where it becomes apparent a resident or service users is vulnerable and may require assistance;
  - To limit instances of tenancy breakdown and provide a responsive housing service to vulnerable tenants in line with the Housing Corporation Regulatory code section 3.5;
  - To maintain balanced communities by delivering appropriate support services to vulnerable tenants and service users, either directly, or by using a multi-agency approach;
  - To prevent abuse;
  - To monitor performance and take steps to improve the service Erimus offers to vulnerable people; and
  - To ensure staff receive the appropriate training and are aware of the reporting and 'alert' system/s in place.
- 1.4 In achieving these objectives, Erimus Housing aims to take the individual circumstances of each tenant or service user into account.
- 1.5 Erimus Housing's staff, Board Members and contractors will be expected to adhere to the principles laid down in this policy and have an individual and collective responsibility to ensure that this policy is actively applied in practice.
- 1.6 This policy acknowledges that the main methods by which an individuals vulnerabilities may be highlighted are via:
- Interest in or application for Housing via Erimus' Choice Based Lettings scheme;
  - Requests for any service provided by Erimus Housing;
  - The local knowledge of Erimus Housing staff;
  - Home visits by Erimus Housing staff (e.g during repairs, modernisation, tenancy checks, warden callouts);
  - Agency referrals (e.g the Probation Service, Connexions, MBC);
  - Partner organisations; and

- Through joint working protocols (e.g True Vision, Tandem).

1.7 Persons covered by this policy include:

- All Erimus Housing tenants; and
- All persons accessing or currently receiving services from Erimus Housing.

## **2. REFERENCE MATERIAL**

2.1 Legislation

2.1.1 This policy has been developed in line with current legislation and good practice.

2.2 Regulatory Code

2.2.1 Section 3.5 of the Regulatory Code states that Housing associations must provide good quality housing services for residents and prospective residents. The guidance states that this must ensure that vulnerable and marginalised residents are provided with appropriate housing services.

2.2.2 Section 3.5 of the Regulatory Code also requires that maintenance is carried out effectively and responsively, in ways that reflect residents preferences. The guidance also states that housing associations must have published service standards for repairs and be sensitive to the needs of vulnerable residents.

2.3 Relevant Policies

2.3.1 The following policies should be considered particularly relevant to the Vulnerable persons policy:

- Achieving Equality & Valuing Diversity Policy (Service Delivery);
- Adaptations Policy;
- Code of Ethics;
- Data Protection, Confidentiality, and Access to Information policy; and
- Homechoice Lettings Policy.

2.4 Relevant Procedures

2.4.1 It is anticipated that procedures will be required to support staff in delivering a service to vulnerable service users or residents.

2.4.2 However, where vulnerable service users and residents are identified via an application for Housing (e.g. when leaving a supported housing scheme), the existing vulnerable applicants procedure should be followed.

## **3 DEFINITIONS**

3.1 Erimus Housing recognises that it is not possible to outline every situation where a resident or service user could be defined as vulnerable. Equally, if a resident or service user meets one or some of the suggested conditions described in section 4.1.2., it does not necessarily mean they require (or want) additional

support. Therefore the categories listed in section 4.1.2. are designed to assist staff in making a judgement as to the support needs of residents or service users, so that the appropriate processes and procedures can be followed.

3.2 To assist staff in supporting residents or service users who may be vulnerable, Erimus Housing defines a vulnerable person as being:

- **‘Any resident or service user who is, or may be in need of community care services by reasons of mental health, or other disability, age, or illness, and is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation’<sup>1</sup>**

3.3 For the purpose of this policy, ‘Resident’ relates to any tenant (or leaseholder) of Erimus Housing. ‘Service User’ relates to any individual who has cause to access or utilise any of Erimus Housings services.

## 4 POLICY CONTENT

4.1 Identifying a vulnerable person

4.1.1 Erimus Housing will aim to identify and support residents and service users who are or may later become vulnerable. This will be achieved by having alert, responsive and well trained staff, supported by well documented procedures with clear referral processes to support agencies.

4.1.2 A resident or service user’s vulnerability may be indicated by them meeting any one of the following criteria; although it is likely that they will meet more than one (this is not an exhaustive list). However, it should be noted that disability or age alone does not signify that an individual is vulnerable.

Status	Functional Ability	Support Networks
Mental Health problems Learning Difficulties Aged over 65 years Alcohol / Substance misuse Recent History of homelessness Threatened with or a victim of Domestic Violence	Self Neglect Unable to perform self care tasks Difficulty with significant daily living tasks Significant problems with finances or budgeting Severely impaired mobility Risk of falls Sensory Impairment	Lives alone Recently bereaved or separated Partner/ carers unable to provide support with current problems Self Isolating No (or inadequate) support advice.
Victim of ASB or harassment Refugee or Asylum seeker Ex Offender Leaving Care	Language/ Literacy difficulties Physically frail Difficulties with child care responsibilities	

<sup>1</sup> Definition taken from the Department of Health document ‘No secrets: guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse’

Lone Parent Under 25 Severe Physical health problems, debilitating illness or disability HIV/AIDS Young people at risk Hospital leaver		
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4.1.3 If a member of Erimus Housing staff becomes aware of, or suspects any incidents of abuse toward a child or vulnerable adult, they should immediately inform their line manager of their suspicions. This will then allow a referral to Middlesbrough Councils Social Services team where necessary. Erimus Housing officers should not directly intervene in such cases.

4.1.4 For other potentially vulnerable residents, Erimus Housing will commit to offering the following support measures as set down in section 4.2.

#### 4.2 Meeting the needs of a vulnerable person

4.2.1 In general terms, Erimus Housing will take the following approach to meeting the needs of vulnerable residents (after gaining their consent):

- Liaison with appropriate support agencies;
- Where resources allow, adapt our properties to meet the disability needs of our residents;
- Discuss at point of application for housing, any additional needs or support needs of vulnerable members of the household, with follow up checks at sign up and regular visits throughout their tenancy;
- Maintain a flexible approach to letting properties to vulnerable people , including allocating priority (in certain circumstances), management lets, transfers and nominations from the Local Authority
- Take firm action to reduce Anti-social Behaviour, harassment, and victimisation, whether racially motivated or not;
- Take a flexible approach to the design and adaptation of our homes where this is practical and possible;
- Provide appropriate fixtures and fittings in our properties which are specifically designed for people with disabilities;
- Provide translations. interpreters, signers, audiotapes, braille, and large print documents to meet identified needs;
- Take into account the views of carers, advocates and personal representatives when consulting with vulnerable residents or service users **as long as their explicit permission has been sought and recorded in advance. (This may be requested in writing if appropriate).**
- Comply with relevant legislation and Best Practice;
- Ensure staff are effectively trained to be able to deal with vulnerabilities, and understand how to support vulnerable individuals sensitively and in confidence;
- Make sure all information used to identify vulnerable people is regularly reviewed and managed in accordance with the data protection act, and is only stored and shared with relevant staff once consent is obtained (in line with our Data Protection, Confidentiality, and Access to Information policy); and

- Take any other reasonable steps to assist the vulnerable person to access services or maintain their tenancy.

#### 4.3 Implementation

- 4.3.1 Overall responsibility for the implementation of this policy lies with the Director of Housing.
- 4.3.2 The Diversity Manager will ensure that Erimus Housing develops procedures which ensure effective implementation of this policy.
- 4.3.3 Erimus Housing will provide comprehensive training for staff who are required to implement this policy.

### **5 EQUALITY AND DIVERSITY**

- 5.1 This policy complements Erimus Housings Equality and Diversity Strategy and Action plan, and is designed to be fully inclusive regardless of the ethnicity, gender, sexuality, religious belief, or disability of service users or residents.
- 5.2 The policy has been developed giving full consideration to the 'Achieving Equality & Valuing Diversity' policy (service delivery).
- 5.3 Consultation has been conducted with a variety of community groups as set down in section 6.1 and their comments have been considered when developing this policy

### **6. CUSTOMER INVOLVEMENT AND CONSULTATION**

- 6.1 The following groups were consulted during the development of this policy:
  - Erimus' Equality and Diversity Working group;
  - Erimus' Corporate Management Team (CMT);
  - The Black and Minority Ethnic Residents' Panel;
  - The Residents' Panel;
  - Area Housing Forums; and
  - Cleveland Disability Forum.

- 6.2 To ensure this policy remains fit for purpose, staff, service users and stakeholders will be consulted prior to any changes being made to it.

### **7 MONITORING AND REVIEW**

#### 7.1 Monitoring

- 7.1.1 Erimus Housing will undertake a review of this policy on an annual basis to ensure its suitability in identifying vulnerable residents and service users, and that the organisation and its employees are able to react to their needs.
- 7.1.2 Supporting performance indicators will be developed to ensure that the procedures which underpin this policy are effective. This policy will be monitored in line with the performance management framework, and accurate records maintained.

## 7.2 Review

- 7.2.1 Erimus Housing will undertake a review of this policy whenever there are any relevant changes to legislation, case law or good practice that would impact on this policy.
- 7.2.2 Procedures relating to this policy will also be periodically reviewed, taking into account any operational issues that arise.
- 7.2.3 The Chief Executive of Erimus Housing will be responsible for ensuring that reviews of this policy are carried out.
- 7.2.4 Tenant representative groups will be involved and consulted in any review of this policy in line with Erimus Housing's policy on tenant participation and consultation. The views of vulnerable tenants will be sensitively sought.

## 8 RESPONSIBILITY

- 8.1 The Diversity Manager has the responsibility for the operational review of this policy, any subsequent communication requirements, training, monitoring of performance and recommending action to rectify any performance shortfall.
- 8.2 Day to day application of the policy is the responsibility of any Erimus Housing officer that comes into contact with service users or residents (i.e. is customer facing).
- 8.3 Officers will therefore be required to refer any tenant or service user who they have identified as vulnerable (or potentially vulnerable) using the guidelines set down in this policy, to their Area Housing Manager or the Head of Agency services for further investigation.
- 8.4 Area Housing Managers will have overall responsibility for ensuring that the QL system is updated to reflect the vulnerabilities of each client as they are identified, and for conducting a review of each client annually.
- 8.5 The I.T manager will have responsibility for ensuring that data relating to service user or residents' vulnerabilities is stored securely and (where necessary shared) in line with the data protection act and data management protocols.