

Midlands Rural Housing

Vulnerability Policy Statement

November 2024

This policy is implemented by Midlands Rural Housing on behalf of four independent partner associations: Leicestershire Rural Housing Association, Northamptonshire Rural Housing Association, Peak District Rural Housing Association and Warwickshire Rural Housing Association. Midlands Rural Housing provides the full range of housing and management services for these four associations in line with a procedure agreement.

Document title	Midlands Rural Housing Vulnerability Policy Statement
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Author title & issuing department	Housing Services Manager
Target audience	MRH colleagues Customers Contractors

Approved by	
Date approved	
Review date	October 2027 – and 3 yearly thereafter.

Links to Regulatory Standards – Economic/ Consumer Standards	<ul style="list-style-type: none"> • The Transparency, Influence and Accountability Standard (“the TIA Standard”) • The Safety and Quality Standard (“the SQ Standard”) • The Tenancy Standard • The Neighbourhood and Community Standard (“the NC Standard”) • The Code of Practice (“the Code”)
Outcome for customers	<p>Residents</p> <p>The policy will ensure improved services for residents through a tailored approach to identifying and using customer vulnerability information.</p>
How were tenants, residents and service users involved in the review/development of this document	Consultation took place on the
Links to Business Plan	<ul style="list-style-type: none"> • 1 - Engage effectively with our residents • 3 - Provide high quality housing management services • 6 - Strengthen and grow partnership arrangements with local authorities, developers, financial organisations and other stakeholders
Links to key values	<p>Diversity: This policy outlines our approach to ensure our services are fair and accessible for all our customers.</p> <p>Openness: This policy sets out our approach in how we support residents with a vulnerability.</p> <p>Accountability: The policy sets out the roles and responsibilities in relation to vulnerability and how we will monitor compliance in this area.</p> <p>Clarity: This policy provides guidance for colleagues on how we define vulnerability and identify vulnerable customers.</p>

1. Introduction

- 1.1 Midlands Rural Housing aims to ensure that everyone can access and benefit from its services but realises that for some residents who are vulnerable, barriers may exist which may prevent participation.

2. Purpose

- 2.1 This policy sets out Midlands Rural Housing's approach to identifying, assessing, and recording and monitoring information regarding residents with vulnerabilities, so we can provide services which consider their needs and individual circumstances.

3. Definitions and scope

- 3.1 We will use the following definition to define a customer with vulnerabilities:

3.1.1 Vulnerability is the potential for a resident or a member of their household to have a temporary or permanent reduction in capacity or resilience due to physical health, mental health or a situation that could increase adverse risk to the person's wellbeing.

- 3.2 We recognise that 'vulnerability' can be temporary, progressive, or ongoing; and while it can be difficult to define, we will usually consider someone to be vulnerable if:

3.2.1 Their personal circumstances and characteristics mean they are significantly more likely than an average person to experience detriment in connection with how the association deals with them, or where that detriment is likely to be more substantial.

- 3.3 We will record known vulnerabilities, disabilities, circumstances, communication, or access needs that we are made aware of. This will enable our staff to make reasonable adjustments when delivering services, in accordance with Equality Act 2010. Please refer to our Disability Policy.

- 3.4 We will handle and process personal data about vulnerability in accordance with the current Data Protection Act 2018, General Data Protection Regulations, and our Data Protection Policy.

- 3.5 We recognise that someone can be vulnerable for several reasons, these may include but not limited to:

- People with a mental health condition
- People with a learning disability or difficulty
- People with a sensory impairment
- People with a physical disability or illness
- People who are frail and elderly
- People who have alcohol or substance misuse problems

- People who are an ex-offender
- People experiencing domestic abuse or harassment
- Care leavers
- People who struggle or need assistance with reading, understanding or comprehending English
- People who lack capacity to make decisions for themselves (under the Mental Capacity Act 2005)
- People with an impairment in their ability to protect themselves from assault, abuse, or neglect.

3.6 We recognise that a person may be vulnerable because of a single problem or condition, or due to a combination of factors. We also acknowledge that vulnerability can occur at different points in a person's life, for instance someone may need support following bereavement for a temporary period, whereas another may require support permanently.

3.7 Where a person experiencing domestic abuse has been identified, we will ensure that all appropriate support is provided and that we handle sensitive information relating to domestic abuse in compliance with the relevant legislation.

3.8 This Policy does not assume that whole groups of people are vulnerable. For example, it is not correct to assume that all older people are vulnerable or that all disabled people are vulnerable.

4. Specifics of the Policy

4.1 How are vulnerable adults identified?

We become aware of a resident's vulnerability in a variety of ways:

4.1.1 When a resident contacts the association there is an opportunity to identify whether they are vulnerable. We recognise that because someone can become vulnerable at different stages of their lives, it is essential that identification of vulnerability is captured at first point of contact.

4.2 Vulnerability can be identified by staff, contractors, residents or any agency working on behalf of Midlands Rural Housing, this can be but not limited to by the following means:

- Completed application forms that include a vulnerability checklist
- During the initial tenancy sign-up or during other home visits
- Over the phone via either our customer care team or all other telephone contacts
- On repairs and maintenance visits
- Notification from relatives, neighbours, or friends
- Routine conversations with tenants

- Notifications from professionals, such as Occupational Therapists, Care Managers or GPs
- From complaints
- Via social media or electronic communication such as email.

4.3 Where a safeguarding concern is identified, this will be reported promptly, in line with our Safeguarding Adults and Safeguarding Children policies and procedures.

5. What happens when a resident is identified as vulnerable?

5.1 When a resident is identified as vulnerable, it is recorded on our data management system, this information will be time bound to ensure accuracy and compliance. Relevant information may be shared with parties who will be dealing with the resident in order to ensure reasonable adjustments are considered. All data will be handled in line with our data protection policy.

5.2 In the case of vulnerabilities, the absence of data can be important, and users should update the record where a customer refuses to record or share vulnerability data.

5.3 Where a resident has been identified during an investigation of potential breach of tenancy, we will carry out a risk assessment and where appropriate a Public Sector Equality Duty assessment (PSED) to ensure that any reasonable adjustments are made and relevant support given. Please refer to our Anti-social Behaviour policy.

5.4 Where a resident has been identified as having a vulnerability that is affecting their ability to manage their tenancy or other welfare needs, we will ensure that appropriate referrals are made to external support agencies.

6. Approach to communication and provision of services

6.1 We will consider what additional support, consideration or reasonable adjustment during service delivery might be appropriate for our vulnerable residents.

6.2 Our general approach includes:

- Making sure that correspondence is provided in an appropriate language and format, including offline formats for those residents that do not access online services.
- Making personal contact with vulnerable residents, where appropriate, rather than relying on written communication.
- Working in partnership with known support services.

- Referring or signposting residents for appropriate advice and/or support and following up on referrals.
- Checking the resident's understanding of their situation, rights, and responsibilities, and the consequences of action or inaction on their part.
- We will ensure our services are accessible and that the accessibility is publicised to tenants, including supporting tenants and prospective tenants to use online landlord services if required.
- We will invite and provide our residents with a wide range of meaningful opportunities to influence and scrutinise our strategies, policies and services.
- Discussing whether adding an authorised person or advocate to discuss their tenancy and support needs may be appropriate and check whether any other arrangements may be in place for this, e.g., Lasting Power of Attorney, in line with our Data Protection Policy.

6.3 Reasonable adjustments - Permission should not be unreasonably withheld. Adjustments could include, but are not limited to:

- Providing translation or interpretation services.
- Carrying out repairs more urgently.
- Providing extra security for persons experiencing Domestic Abuse for example extra door locks and security lights.
- Sending communication in large text or braille.
- Providing minor adaptations to properties or signing posting to Occupational therapist/GP for major adaptations and funding.
- Carrying out a home visit or arranging a meeting over the phone or online.
- Allowing longer for a resident to come to the door.

6.4 We understand that the circumstances, preferences and needs of each person will differ. Where possible, adjustments to our service will be person-centred, focussing on the needs and circumstances of each individual.

6.5 Where we are not able to meet a resident's request for a housing adaptation, we will consider whether it is appropriate to offer alternative measures in order to support the affected resident, for example offering to transfer them to a home that is accessible or that can be adapted to meet their needs.

7. Working with partners

7.1 We aim to take a multi-agency approach where appropriate and will work with partner organisations to co-ordinate activity. This will be achieved through:

- Referrals to support providers and/or statutory services.
- Signposting residents to support services, advocacy, and advice agencies.
- Attending professionals' meetings, as appropriate.

8. Implementation

8.1 This policy will be implemented through supporting procedures, training and communications to staff. This policy will be available on our website, and accessible for staff on our internal SharePoint page. A hard copy is available on request.

8.2 All staff will be responsible for implementing the policy in line with their roles.

8.3 All staff and board members will attend frequent Equality, Diversity and Inclusion training.

9. Responsibilities

9.1 The Housing Services Manager and Area Housing Managers are responsible for ensuring application of the policy and monitoring its effectiveness.

10. Associated documents

- Safeguarding Policy
- Equal Opportunity Policy
- Allocation Policy
- Adaptations Policy
- Anti-Social Behaviour Policy
- Complaints Policy
- Domestic Abuse Policy
- Data Protection Policy
- Disability Policy
- Maintenance and Repairs Policy
- Retention Policy

11. Legislation and regulation

11.1 Legislation and regulation include but are not limited to the:

- Equality Act 2010
- Data Protection Act 2018 including the General Data Protection Regulation
- Human Rights Act 1998
- The Mental Capacity Act 2005

- Care Act 2014
- Social Housing Regulation Act 2023
- Joint Housing Protocols for Care Leavers: Good Practice Advice 2024

12. Data protection

12.1 Midlands Rural Housing will treat personal data in line with our obligations under the current data protection regulations and our own Data Protection Policy. Information regarding how resident data will be used and the basis for processing customer data is provided in the Association's Privacy Notice.

13. Equality of access

13.1 It is essential that the Vulnerability Policy should be equally accessible to our residents. We will ensure that the policy is provided in easy-to-read formats and provide customers access to appropriate support which will include:

- translation of communications into another language
- translation of communications into braille
- use of Language Line interpretation service
- communicating with the resident's advocate, where permission has been granted.

14. Review

14.1 We will review this Policy every 3 years and/or to address changes in legislative, regulatory, best practice or operational issues.

15. Complaints

15.1 If you're dissatisfied with the service you have received you can raise a complaint by accessing the relevant association's link below:

[Warwickshire Rural Housing Association](#)
[Peak District Rural Housing Association](#)
[Leicestershire Rural Housing Association](#)
[Northamptonshire Rural Housing Association](#)