

	Title	Customers with Vulnerabilities Policy		
	Reference	Corporate Policy	Owner	Director of H&W
	Approved by	Customer Committee	Approval date	24/05/2023
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1. Purpose and scope

- 1.1 This policy sets out NCHA's approach to identifying, assessing and recording the needs of customers with additional needs or vulnerabilities in order to provide access to tailored services and improve satisfaction.
- 1.2 This policy applies to all NCHA's customers which includes residents, tenants, leaseholders, shared owners and residents of Nottingham Community Almshouses Charity (NCAC).

2. Responsibilities and risk

All colleagues
NCHA contractors

The key risks of failing to follow this policy are:

- Failing to take account of customer vulnerabilities in the provision of services which could lead to inappropriate support or services being offered with a negative impact on the customer or their tenancy sustainment
- Inappropriate or incorrect recording or sharing of sensitive or special category data may lead to a data breach under the General Data Protection Regulations (GDPR)
- A lack of understanding of informal advocate or formal advocate processes including Power of Attorney or Court Appointed Deputy may lead to a data breach under GDPR regulations

3. Policy details and guidance

3.1 General Principles

- 3.1.1 This policy does not replace specific care and support approaches to positive behaviour support and support delivery in general. NCHA Care and Support colleagues should refer to specific support plans and risk assessment to determine how support is to be delivered to care and support service users.
- 3.1.2 In cases where a customer lives in an NCHA property and receives specialist support through an external support provider, or agent group, this policy will apply only to our housing management or landlord responsibilities.
- 3.1.3 Where there is a risk of harm to adults who are experiencing, or are at risk from, abuse or neglect we will follow our safeguarding and domestic abuse policies and procedures.
- 3.1.4 NCHA will ensure that contracts delivering services on our behalf will have appropriate policies and training in place to meet the needs of customers with vulnerabilities.

3.2 Customer Data, Processing and Advocates

- 3.2.1 Customers with 'sensitive data attributes' or vulnerabilities are identified in the Hub on the Capita system using the 'Vulnerability Symbol' which will indicate to colleagues that they should check the 'Key Information' screen for full details of the needs or attributes recorded.
- 3.2.2 Customers will be asked to provide information on vulnerabilities and support needs as part of sign up to an NCHA tenancy or NCAC licence. In doing so customers consent for NCHA to record, process and share the information with relevant statutory organisations for the purpose of providing a tenancy and if necessary, support services to customers in accordance with Article 9

of the GDPR. NCHA has a Data Protection Policy that details how NCHA handle and process personal data in accordance with the Data Protection Act and General Data Protection Regulation.

- 3.2.3 All customers will be able to decline to provide their vulnerabilities data or to refuse consent for sharing of information with other agencies/ organisations.
- 3.2.4 Customers have the option to use informal advocates to assist them in their day to day business with NCHA or a Court appointed Power of Attorney using the forms in s4.1 below.
- 3.2.5 When requesting a service from NCHA, for example, a repair or home visit, customers should be asked if there are any specific adjustments required, including allowing additional time to answer the door. This information can also be added to MYNCHA when customers log a repair job. This information is passed to contractors as appropriate.
- 3.2.6 NCHA collects data to support service adjustments where the customer:
- Is blind or partially sighted - requires written communication in braille
 - Is deaf or partial hearing – allow additional time to answer the door
 - Has difficulty walking short distances or climbing stairs – allow additional time to answer the door
 - Has difficulty carrying objects, using a keyboard, household appliances and controls
 - Requires additional time and patience to process information
 - Does not speak English and may require translation support
 - Has support from social service/voluntary support group

3.3 Change in Needs or Vulnerabilities

- 3.3.1 We recognise that customers who are initially not recognised as having vulnerabilities, may develop support needs during the period of their tenancy and that the level of support a customer requires may vary. If colleagues become aware of a change in customer circumstances they should update the relevant key information detail records on Capita. Customers can also be signposted to MYNCHA to update their own vulnerabilities attributes.
- 3.3.2 As a result of vulnerabilities, customers can present with behaviours that cause concern or have a negative impact on colleagues. The Anti-social Behaviour and Hate Incident Policy provides information on how NCHA and colleagues should respond in these incidences. NCHA has a ‘red flag’ procedure to support colleagues where customers who present risks or have risk creating behaviour that could affect the services that NCHA or our contractors deliver. NCHA has a customer facing ‘Treating People Fairly’ Service Standard that clearly articulates what customers can expect from us, and us from them in relation to appropriate behaviours.

3.4 Support Options

- 3.4.1 Colleagues should ensure that when providing any service that it is tailored to suit a customer’s needs by taking into account vulnerabilities or support needs of the customer. Further advice and guidance to meet specific needs can be sought from colleagues in specialist Care and Support services or through the Community Support Team.

3.4.2 Customers with tenancy sustainment issues or an identified support need that they are not receiving support for from other agencies will be supported by their Community Co-ordinator to access services in the community and/or be referred to the NCHA Community Support Team for an appropriate intervention if necessary. The Community Support Team also will offer resettlement support to new customers identified as requiring it following the letting process.

3.4.3 NCHA provides assistive technology services to support customers to remain independent in their home. If required colleagues can submit a referral to the Customer Wellbeing Team to contact the customer and further assess their needs.

3.4.4 If a customer or a member of a customer's household has a disability, NCHA can install minor aids and adaptations to the home. Major adaptations may also be made to meet the needs of all disabled customers. Full details of this service is within the Adaptations Policy.

3.5 **Training**

3.5.1 Managers are responsible for ensuring that colleagues providing services to customers with additional vulnerabilities or support needs receive adequate training and support to enable services to be delivered appropriately.

4. **Supporting documentation and key legislation**

4.1 **Forms**

N/A

4.2 **Guidance**

N/A

4.3 **Legislation**

[Mental Capacity Act 2005](#)

[Equality Act 2010](#)

[Care Act 2014](#)

[Data Protection Act 1998 and General Data Protection Regulation](#)

[Mental Health Act 1983](#)

[Homes and Communities Regulatory Framework 2015](#)

4.4. **Related policies**

Safeguarding Adults, Children and Young Persons

Domestic Abuse Policy

Disabled Adaptations Procedure

ASB and Hate Incidents Policy

Data Protection & Access Policy

Equality, Diversity and Inclusion Policy

Treating People Fairly Service Standard

5. **Monitoring and reporting**

5.1 This policy will be reviewed every three years unless legislation, business or sector developments require otherwise – to ensure that it continues to meet the stated objectives and take account of good practice developments.

6. Definitions

6.1 We define vulnerability as being any condition or circumstance, temporary or permanent that puts an individual or household at risk of losing their home, or any situation which, without support or intervention, places them at risk of abuse, neglect or causes detriment to their overall wellbeing.

6.2 Sensitive data attributes are:

- Racial or ethnic origin
- Political beliefs
- Religious or philosophical beliefs
- Trade union membership
- Genetic or biometric data
- Physical or mental health
- Sex life or sexual orientation

6.3 MYNCHA – dedicated customer web portal to access NCHA services

7. Equality and diversity

7.1 This policy/procedure has been written in line with NCHAs Equality, Diversity and Inclusion Policy and Equality Statement.

7.2 This policy is supported by an Equality Impact Assessment.

8. Appendices

None

9. Policy approval

9.1 This policy has been approved prior to issue by the Director of Homes and Wellbeing or if applicable by NCHAs Board or Customer Committee.