

Policy Owner	Christian Blackbeard	Business Area	Housing
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## Vulnerable Customer Policy

“Recognise, respond, record”

### 1.0 Purpose of the Policy

- 1.1 Coastline is committed to meeting the needs of all its customers, to ensure their independence, privacy, and dignity, and to treat them with fairness and respect.
- 1.2 This Policy aims to outline how we can recognise and assist customers including those who may be classified as "vulnerable" to ensure that they can access services and receive the assistance they need to sustain their tenancy. The term "vulnerable customer" does not seek to label individuals negatively. It recognises that vulnerability is a multifaceted and fluid concept. Vulnerability arises from various personal, situational, or circumstances that hinder an individual's ability to access services and may expose them to potential harm or disadvantage.
- 1.3 The purpose of the policy is to allow members of staff to recognise potential barriers and to define reasonable adjustments and how these can be implemented.
- 1.4 The policy relates to those customers who are vulnerable but have the capacity to make their own decisions. For customers who lack capacity, please refer to section 3.
- 1.5 The policy aims to allow all our customers to have the opportunity to access and benefit from Coastline services by explaining how members of staff can identify, record and respond to vulnerable customers in a human-centric way.

### 2.0 Defining Vulnerability

- 2.1 Vulnerable customers are defined as those who have a particular characteristic and/or experience an exceptional life event and are either currently unable to act independently or are unable to cope with managing their tenancy without additional support.
- 2.2 Coastline recognises that a customer’s vulnerability may be exacerbated if colleagues do not act with appropriate levels of care when dealing with a vulnerable customer. Coastline also recognises that if effective reasonable adjustments have been put in place, the vulnerability may be reduced.
- 2.3 Vulnerability can be a changeable state, influenced by multiple factors and experiences. Common conditions or characteristics that may indicate vulnerability include, but are not limited to:
  - Chronic illness;
  - Elderly age;
  - Unemployment;
  - Financial distress;

- Non-native English speakers;
- Hearing or speech impairments;
- Intellectual impairments.

- 2.4 Please refer to the Sustainability Policy for further information regarding identifying and supporting customers that are experiencing or at risk of severe hardship and how to access the Sustainability Fund.
- 2.5 There are groups who are more likely to be at risk of becoming vulnerable, such as the elderly, young people and single parents. These people may not be exhibiting the signs of a vulnerable customer but may be more likely to become vulnerable if additional considerations of their circumstance are not put in place.
- 2.6 It is important to note that vulnerability does not necessarily imply a lack of competence or comprehension.
- 2.7 An individual's ability to act, engage or cope with everyday activities varies and is not set.
- 2.8 Coastline's objective in developing this Policy is to recognise, adjust and respond, supporting the 'whole person' using a person-centred model.

### **3.0 Legislation, Statutory Regulatory Duties & References**

- 3.1 This policy is in line with the Equality Act 2010. The Equality Act 2010 relates to the protected characteristics of our customers; however, this policy goes beyond recognising these characteristics and in addition recognises that customers can be vulnerable for reasons beyond those include in the legislation.
- 3.2 Mental Capacity Act (2005)  
Some customers may lack the capacity to make their own decisions in line with the Mental Capacity Act 2005 and therefore Coastline will liaise with those who have the legal authority to act on the customer's behalf.
- 3.3 This may be;
- A Legal Power of Attorney;
  - Someone with a Deputyship order from the Court of Protection;
  - A Litigation friend appointed in Court proceedings;
  - An appointee appointed by the Department for Work and Pensions;
  - An independent Mental Capacity Advocate.
- 3.4 The policy takes account of the following regulations and guidance:
- i. This policy also follows the Housing Ombudsman [Spotlight Report – Relationship of Equals](#) .The Spotlight report, focusing on attitudes, respect and rights, assesses what it means to be vulnerable in social housing in 2024, what “vulnerable” means and how social landlords can better respond to the needs of those residents.

- ii. The Social Housing (Regulation) Act 2023 aims to drive landlords' compliance with the consumer standards by empowering the Regulator of Social Housing (RSH) with new enforcement powers to tackle failing landlords. The Act implements a set of policy measures to ensure that residents know how their landlord is performing and are able to hold them to account.
- iii. Reference RSH's Customer Involvement & Empowerment Standard requirement to "treat customers with fairness and respect" and link to the Customer Satisfaction Measures (TSMs) – demonstrating that we understand the different needs of our customers.

### 3.5 Other legislative references include;

- Human Rights at Home (guidance for social housing providers)
- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006

## 4.0 Main Principles and Objectives

- 4.1 As a responsible social landlord, one of our key objectives is to ensure that our vulnerable customers receive the services they require, in a way that best meets their needs, in order to sustain their tenancy and/ or licence.
- 4.2 It is important that we recognise vulnerable customers' individual needs and embed a way of working consideration of these needs into our services.
- 4.3 Coastline will take a person-centred, strengths-based approach to supporting customers, meaning that we will look at what our customers can do, rather than what they can't, and challenge stigma associated with labelling and "othering".
- 4.4 To achieve this, we aim to:
  - Record any known vulnerabilities in the Customer Relationship Management system (CRM) and in the care and/ or support plan, and keep these up to date, be accessible and be shared and used appropriately;
  - Use all available information to identify whether a customer is vulnerable;
  - Take account and recognise the impact of known vulnerability factors in the provision of services and in decisions around tenancy and housing management and enforcement;
  - Provide assistance for vulnerable customers in accessing services they may need;
  - Record and maintain details of any known representatives, third parties and power of attorney who act as a delegated authority on the customer's behalf; and
  - Consider any additional needs due to vulnerabilities and, where appropriate, make any reasonable adjustments (see Section 9) and vary service delivery to ensure vulnerable customers can still receive a bespoke service.

4.5 The Care and Support Policy (Extra Care) outlines how vulnerabilities should be incorporated into care and support plans, for further information please refer to this policy.

## 5.0 Signs of Vulnerability

5.1 Vulnerable customers may not disclose their vulnerabilities, however there are signs that may indicate a customer who is currently vulnerable, such as;

- Customers who are falling into rent arrears or other debt problems;
- Customers who have issues maintaining their tenancy or licence;
- Customers who are the victim or perpetrator of anti-social behaviour, hate crime or harassment;
- Customers who have disputes with neighbours;
- Customers who have damage to their home;
- Customers who experience a detrimental change to their physical appearance;
- Customers who fail to respond to correspondence or to answer the door when visited; or
- Customers who are experiencing self-neglect, hoarding or other behaviour which results in the person's home becoming damaged, neglected or otherwise unfit for occupation.

## 6.0 Identifying & Recording Vulnerability

6.1 A vulnerable customer may be identified at various points during their tenancy, such as;

### Consider our 'anticipatory' duties

- During pre-tenancy applications;
- During care and/ or support planning sessions;
- By any colleagues who have contact with the customer, for example;
  - Customer Access Team
  - Tenancy Team
  - Repairs & Maintenance Team or external contractors during home visits;
- From reports from relatives or caregivers; or
- From a referral from an external agency or organisation.

6.2 All colleagues will receive training on how to identify vulnerabilities record and report this appropriately.

6.3 If the vulnerability becomes a safeguarding concern, for example ongoing domestic abuse, this must be raised in accordance with either the Safeguarding Adults Policy or Safeguarding Children Policy and reported to the safeguarding lead (Deputy CEO).

## 7.0 Vulnerability and Multiagency Referrals

7.1 There may be times where a vulnerable customer requires additional support beyond our services, usually this will be a safeguarding concern and will follow the safeguarding policies.

7.2 However, there may be other support that a vulnerable customer requires outside of safeguarding, such as;

- Housing-related support;
- Debt advice and welfare benefit services;
- Advocacy services;
- Support for carers in fulfilling their responsibilities.

7.3 Concerns relating to mental health, adult social services, substance misuse or domestic abuse should be reported as a safeguarding concern in line with the safeguarding and hoarding policies and procedures.

## 8.0 Reasonable Adjustments

“Ask the customer ‘what matters to them’, not ‘what’s the matter?’”

8.1 Reasonable adjustments are adjustments that we are able to make to reduce the impact or disadvantage that a vulnerable customer may have when trying to access our service or maintain a tenancy.

8.2 Reasonable adjustments include but are not limited to;

- Allowing more time for a customer to respond or provide information;
- Making sure office buildings do not present obstacles for disabled customers, for instance providing ground floor meeting rooms or offering alternative locations;
- Making sure supported accommodation does not present obstacles for disabled customers, for example by providing ramps or ground floor accommodation for those who need it;
- Providing large print, Braille or alternative languages for documents;
- Allowing customers more time to answer the door if the customer has mobility issues;
- Allowing the customer flexibility in the ways they access the complaints process, e.g., using their preferred communication method to prevent barriers;
- Allowing for an extension of time limits with complaints if required by the customer; and
- Working to find alternative solutions where a reasonable adjustment is unavailable.

## 9.0 Communications

“The meaning of communication is the result it elicits”

9.1 Vulnerable customers may request alternative contact methods to best suit their needs. We will allow customers to choose how they would like to be contacted to reduce any potential barriers.

9.2 Vulnerable customers can request the following communication methods;

- Face to face;
- Mobile or landline telephone calls;
- Letters;
- SMS;
- Email;
- Through the My Coastline online portal;
- British Sign Language / interpreter; or
- Communication through a delegated authority (Third Party or Power of Attorney).

9.3 Customers are asked about their contact preferences during the pre-tenancy/lettings process. All customers including vulnerable customers can change their contact preferences at any time by notifying us and this will be recorded on their contact details on CRM and/ or support plan if applicable.

## 10.0 Service Standards

10.1 As with all customers, vulnerable customers will be supported through reasonable adjustments to understand their obligation to pay rent, and to occupy and maintain the property, and that failure to do so could lead to legal action or eviction. It is the responsibility of colleagues to identify vulnerabilities and suggest appropriate adjustments.

10.2 The Repairs Delivery Service should make adjustments to the priority codes if they consider the repair will have a serious negative impact on the vulnerable customer.

10.3 Call handlers should also confirm any disability, reasonable adjustments or additional support needs when booking repairs and record this on the customer's contact information.

10.4 Hate crimes, domestic abuse and harassment are a top priority and any concerns or complaints raised should be escalated to a safeguarding referral if the customer is at risk.

10.5 If a vulnerable customer is the perpetrator of anti-social behaviour, they will be encouraged to engage in tenancy support services before any enforcement action is considered.

## 11.0 Compliance and Monitoring

- 11.1 Recording and reporting vulnerabilities should follow GDPR obligations and align with the Data Protection Policy.
- 11.2 Maintaining accurate and up-to-date information is vital as vulnerabilities can change or intensify and so by having accurate and up to date customer information it allows us to put in place reasonable adjustments and/ or additional support needs.
- 11.3 All colleagues are responsible for reporting vulnerabilities and are required to read and understand this Policy and complete all mandatory training.
- 11.4 This Policy will be updated following any updates to appropriate legislation.
- 11.5 This Policy follows recommendations from the Housing Ombudsman Spotlight On: Attitudes, Respect and Rights 2024.

## **12.0 Cross Reference with Other Policies**

- 12.1
- Safeguarding Adults Policy
  - Safeguarding Children Policy
  - Data Protection Policy
  - Tenancy Policy
  - Care and Support Policy
  - Antisocial Behaviour Policy
  - Hoarding Policy
  - Sustainability Fund Policy