

Paradigm Housing Group

Vulnerable Persons Policy

April 2017



	<h2 style="text-align: center;">Vulnerable Persons Policy</h2>
<p>Policy statement</p>	<p>As a Private Registered Provider of homes with a social purpose, Paradigm is committed to supporting its vulnerable residents and recognises the importance of the ability to live as independently as possible.</p> <p>All Paradigm residents have an obligation to fulfil the conditions of their tenancy/licence/lease agreement (to pay the rent, keep their property in good condition, be respectful neighbours etc.) and we will take action if they do not do so. Being vulnerable does not mitigate a resident from these responsibilities. However, we recognise that some residents will require additional support in meeting their obligations. We aim to help our residents to sustain their tenancies/licences/leases.</p> <p>Our Vulnerable Persons Policy is an over-arching Policy and it is the responsibility of all staff, managers and board members to be aware of how vulnerability might act as a barrier in terms of customers accessing and receiving services, and to identify how their own area or function may be improved to meet the needs of vulnerable people.</p>
<p>Who is Vulnerable?</p>	<p>Paradigm’s definition of vulnerability, not only includes those who may be considered as vulnerable for the purposes of those in need of community care and support services, but also extends to anyone who experiences difficulties with everyday living and/or who needs additional support to meet their obligations under their tenancy/licence/lease. There may be some overlap with those who have a protected characteristic under the Equality’s Act. However, it is important to understand that not all those falling within the protected groups will be vulnerable, and people may well be vulnerable for reasons other than those specifically covered by equalities legislation. In particular, our approach to vulnerable people recognises that vulnerability need not be a permanent state and that people may be vulnerable at different times for different reasons (e.g. following bereavement or relationship breakdown).</p> <p>Our approach does not assume that whole groups of people are vulnerable. For example, it is not correct to assume that all older people are vulnerable even though there may be evidence to suggest that many are. Appendix 1 contains some suggestions of people who <i>might</i> be vulnerable, though this is not intended to be exhaustive.</p> <p>A person can be vulnerable as a result of a single problem or condition or a combination of factors. It may be because they are isolated from their support network or not coping with their current circumstances, Appendix 1 also suggests some indicators or points of vulnerability that a person may experience.</p> <p>The nature of the support provided will depend on the level of vulnerability and the individual’s, or household’s, circumstances. Some support may be provided by Paradigm directly. In many cases, it will be more appropriate for support to be provided by specialist, external agencies following a referral by Paradigm. Support may be short-term or longer term. Sometimes support is time limited with a view to encouraging an individual to alter their lifestyle and/or to gain the skills, motivation</p>

	<p>or confidence to move on to greater independence. Appendix 2 provides a summary of the support that Paradigm will and can provide along with the role Paradigm will play in relation to support provided by other agencies.</p>
<p>Objectives</p>	<ul style="list-style-type: none"> • To ensure we comply with all legal and regulatory requirements and standards • To ensure that staff take this policy into account and apply its principles when developing strategies, policies and procedures for their service areas • To ensure that we take into account individual circumstances and do not apply blanket policies when decision making • • To ensure that we undertake screening assessments for all services. Where the screening assessment indicates a full assessment is necessary and/or advisable, we will undertake a full impact assessment, and understand the importance and positive influence these assessments can have To identify vulnerability as early as possible, and to identify appropriate support mechanisms and/or ways we can adapt our service to meet the needs of our vulnerable residents.
<p>Legal and Regulatory Background</p>	<p>The Homes and Communities Agency (HCA) Regulatory Framework 2015</p> <p>The Tenant Involvement and Empowerment Standard requires Registered Providers to:</p> <ul style="list-style-type: none"> • provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards • treat all tenants with fairness and respect • demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs. • demonstrate how they respond to tenants' needs in the way they provide services and communicate with tenants. <p>The Tenancy Standard requires Registered Providers to:</p> <ul style="list-style-type: none"> • take into account the needs of those households who are vulnerable by reason of age, disability or illness, and households with children, including through the provision of tenancies which provide a reasonable degree of stability <p>The Human Rights Act 1998</p> <p>All public authorities, or bodies exercising public functions (which includes Paradigm for certain services), must act compatibly with human rights. The human rights most relevant to housing are:</p> <ul style="list-style-type: none"> • right to respect for private life, family life and the home • right to a fair trial • prohibition of discrimination. <p>The key things to consider are whether we are acting legally, fairly, transparently</p>

	<p>and proportionately and in line with our own policies. It is important, however, to avoid applying ‘blanket’ policies. We must allow individual circumstances to be taken into account in our decision-making, particularly in relation to vulnerability. The ability to take account of individual circumstances will be an important consideration in undertaking impact assessments, when developing or reviewing our strategies, policies, procedures or functions.</p> <p>Pre-Action Protocol for Possession Claims by Social Landlords (2015)</p> <p>The protocol sets out the requirements that a Registered Provider of Social Housing must have either considered or complied with in relation to possession proceedings.</p> <p>The aims of the protocol are to:</p> <ul style="list-style-type: none"> • encourage more pre-action contact and exchange of information between landlords and tenants; • enable the parties to avoid litigation by settling the matter if possible; and • to enable court time to be used more effectively if proceedings are necessary. <p>Courts will take into account whether the protocol has been followed when considering what orders to make.</p> <p>Part 1 of the protocol requires us to consider the vulnerability of the tenant prior to the commencement of proceedings. If we are aware the tenant has difficulty reading or understanding information, we must take reasonable steps to ensure that we have communicated appropriately and that the tenant understands any information we have given.</p> <p>Where the tenant is under 18, or particularly vulnerable, we need to consider at an early stage:</p> <ul style="list-style-type: none"> • whether the person is likely to have mental capacity to defend the proceedings (if not we should make an application for the appointment of a litigation friend) • whether or not any issues are likely to arise under the Equality Act 2010 (e.g. possibility of tenant with a disability, which includes mental health issues, making a disability discrimination claim). <p>Data Protection Act (1998, as amended) – governs the protection of personal data. It is not a barrier to sharing information but provides a framework to ensure that personal information about a person is shared appropriately; this will particularly apply if we are sharing information with support providers in relation to a person’s vulnerability.</p>
<p>Policy Principles</p>	<p>Our approach to supporting vulnerable people is based on the following principles. We will:</p> <ul style="list-style-type: none"> • Promote an approach based upon “equality of outcome” not an “equality of service, this may mean treating people differently to achieve an equal outcome • Promote and maintain inclusive services to ensure that our services are

accessible to all, assessing this through a programme of Impact Assessments, supported by improvement action plans (where appropriate), in all relevant service areas (as identified by the screening assessments) to ensure that our processes reflect the needs of vulnerable residents

- We will utilise the profile information that we hold to tailor our services to the individual needs of residents. We will also identify trends across our customer base in relation to incidents where we have tailored our services, and conduct reviews based upon this evidence and update/amend our policies, processes etc. accordingly
- Ensure that front line staff are empowered to be flexible in the way that they provide services to support vulnerable residents in the most effective way possible
- Ensure that staff members have the necessary skills, knowledge and guidance to deal effectively with the many facets of vulnerability. This will include training / refresher training including mental health awareness, duty of care and safeguarding, multi-agency working, equalities legislation, handling difficult situations, and drug and alcohol awareness
- Issue, under our Tenure Policy, the most compatible form of tenure with the purpose of the housing
- Seek to identify potentially vulnerable people at an early stage to enable preventative action and timely, targeted support. (Appendix 3 outlines all the action we take to identify vulnerability)
- Recognise the role of carers, care workers, advocates and other personal representatives and take their views into account when consulting vulnerable residents
- Comply with relevant legislation, pre-action court protocols and recognised best practice, including in terms of information sharing and data protection
- Work effectively with appropriate partner agencies to ensure support needs are met and to avoid duplication of service provision
- Promote the principles of this policy to our staff, customers and stakeholders
- We will measure the effectiveness of this policy by:
 - Analysis of Duty of Care concerns
 - A reduction in the number of evictions, abandonments or otherwise failed / failing tenancies involving a vulnerable person or household
 - A reduction in the number of cases of ASB or harassment involving a vulnerable person (either as victim or perpetrator)
 - Zero complaints based on a failure to support vulnerable residents
 - An increase in customer satisfaction amongst vulnerable residents,

	<p>(e.g. via feedback on Tenancy Sustainment case work or experience of using the Aids & Adaptations service)</p> <ul style="list-style-type: none"> • Evidence of robust screening assessments being undertaken for all services • Evidence of robust Impact Assessments (IAs) being undertaken for all relevant service areas (as identified by the screening assessments) <p>Our annual assessment of compliance with the Homes & Communities Agency's regulatory standards is a further test that we are meeting our responsibilities to vulnerable residents.</p>
Scope	<p>This policy is relevant to all services that Paradigm provides to its customers.</p> <p>Whilst this Policy focuses on our residents, we recognise our responsibility as a large, local employer of over 450 people and are committed to supporting any staff experiencing difficulties (see Appendix 2 in relation to support that Paradigm can/will provide to staff).</p>
Responsibility	<p>The overall responsibility for this policy lies with the Director of Corporate Services. However all service area managers are responsible for the application of this policy in relation to their service areas.</p>
Customer focus	<p>This policy was considered by the Residents Forum on 31 August 2016, and their feedback and comments were taken on board.</p>
Cross references	<p>Equality, Diversity and Inclusion Strategy Tenancy Sustainment Strategy Safeguarding Policy Impact Assessment Template & Guidance</p>
Equality and Diversity	<p>Paradigm's Equality, Diversity and Inclusion Policy outlines our commitment to equality of access and outcomes for all customers. This Vulnerable Persons Policy is compatible with the principles outlined in the Equality, Diversity and Inclusion Policy.</p> <p>By the very nature of the principles and objectives set out within this Policy, an impact assessment is not required.</p>
Risk and Value for Money	<p>Addressing the needs of vulnerable people is a key business requirement as many of the risk faced by our vulnerable residents are passed on to Paradigm e.g. through disruption to rental income and increased property turnover. A sustained tenancy/licence/lease in most cases will be more cost effective than a homeless or crisis situation requiring intensive, expensive emergency support.</p> <p>The continued programme of welfare and housing benefit reform and the many changes that this is bringing about is having a negative impact on many vulnerable</p>

	<p>people and low income families. Failure to identify and support these residents could result in a high property turnover.</p> <p>Failure to provide an inclusive and equitable service to our residents, could lead to reputational damage, a breach of the HCA consumer standards or a discrimination claim being made against the organisation.</p> <p>If we do not act compatibly with human rights, individuals who are adversely affected can challenge this by raising a complaint or bringing a claim in the courts. This can be in the form of a stand-alone human rights claim, or, if a person is already involved in legal proceedings against a public body, then they can add a human rights claim to those proceedings. For Paradigm, this is most likely to occur in those possession cases where the judge has a limited amount of discretion (e.g. where we are seeking possession on a mandatory ground or following service of a Section 21 notice).</p> <p>A person challenging a public authority decision (e.g. in relation to allocations, assignment, succession) through judicial review can also claim that the decision violated their human rights.</p>
<p>Definitions</p>	<p>Residents: is the term used for tenants, licensees, shared owners and leaseholders of a Paradigm Property.</p> <p>Vulnerable: there is no legal definition of vulnerable, however, Paradigm's definition of vulnerability, not only includes those who may be considered as vulnerable for the purposes of those in need of community care and support services, but also extends to anyone who experiences difficulties with everyday living and/or who needs additional support to meet their obligations under their tenancy/licence/lease.</p>

<p>Policy Owner</p>	<p>Gary Robinson– Director of Corporate Services</p>
<p>Prepared by</p>	<p>Original Vulnerable Persons Strategy prepared by Helen Green – Policy Manager Revisions to develop this policy in place of the strategy prepared by Sinead Lee – Policy Manager</p>
<p>Approved by</p>	<p>Management Team - 11 August 2016 Housing Services Committee - 14 September 2016 Group Board - 28 September 2016</p> <p>Updates in April 2017 to reflect two stage impact assessment process. Approved by Management Team on 13 April 2017, and Board on 26 April 2017.</p>
<p>Date of Board approval</p>	<p>28 September 2016</p>
<p>Effective date</p>	<p>May 2017</p>
<p>Review date</p>	<p>May 2020</p>

Appendix 1: Examples of people who *might* be vulnerable

Examples of people who might be vulnerable include, but are not limited to:

- people with a physical or sensory disability
- people with a learning disability
- people with mental health issues
- people who are seriously ill
- people experiencing domestic abuse
- older people
- single parent families
- pregnant women (especially teenagers)
- unemployed people
- former members of the armed forces
- people leaving care
- ex-offenders
- people who are considered to be financially excluded
- people with substance abuse problems
- people who have difficulties understanding, speaking or reading English

During a resident's customer journey with Paradigm, indicators or points of vulnerability might include:

- homelessness / repeat homelessness
- hospitalisation
- periods following discharge from hospital or other institutional care
- periods of sustained illness at home
- bereavement
- period of change from supported accommodation to independent living
- evidence of neighbour harassment or abuse toward the individual or household
- evidence of anti-social behaviour by the individual or household
- unemployment / reduction in hours
- divorce / relationship breakdown
- arrears of rent or other debt problems

Appendix 2

1. Support provided by Paradigm

Providing information and help with accessing services

This will include:

- providing advice and signposting people to other organisations
- making referrals within Paradigm Housing Group e.g. to a Tenancy Sustainment Officer or the Disabled Facilities Officer
- making referrals to external organisations (see section two below)
- helping with completion of forms and provision of documents e.g. for verification purposes
- helping with applying and bidding for housing under choice-based lettings

Making adjustments to service delivery arrangements

We use profile and other vulnerability information proactively to inform the way we deliver our services. This may include:

- more regular contact maintained by an appropriate staff member
- undertaking home visits
- agreeing a nominated contact person (e.g. a carer)
- providing information in other formats where agreed with the customer that this is the most appropriate means of communication (e.g. translations, interpreters, signers, audiotapes, Braille, large print documents)
- allowing more time to get to the telephone or door
- accelerating repairs for people with particular health / vulnerability issues
- waiving recharges for repairs in certain circumstances
- undertake and charge for a repair that is a residents responsibility to complete
- requesting housing benefit payments for some residents to be paid direct to Paradigm
- providing assistance to maintain the homes and gardens of vulnerable residents who have no other help available to them e.g. decorations

Provision of aids and adaptations

We support the provision of aids and adaptations that help residents enjoy independence, privacy and dignity by:

- funding and delivering adaptations costing less than £1,000 within a defined annual budget
- assisting tenants to access local authority Disabled Facilities Grant (DFG) for major works costing more than £1,000.

Supported housing services

Welwyn Hatfield Foyer & Small Steps Scheme – we provide accommodation for up to 50 young people between the ages of 16 and 25, including several young parents. Residents receive advice, counselling and support to help them find employment, training, education and other benefits which will prepare them for life in the wider community.

In addition, there are a number of supported / specialist housing schemes where Paradigm provides traditional landlord services and the support or care is provided by a third party.

Temporary housing for homeless people

Paradigm provides approximately 700 units of private sector leased accommodation. These are properties procured from private landlords and used by local authorities to provide temporary housing for homeless households, providing an alternative to the use of bed and breakfast accommodation.

Lea Bridge House provides hostel-type accommodation to up to 142 single, non-priority homeless people, aged 25 plus.

Work to promote financial inclusion

We recognise that poverty and debt are more prevalent in social housing than in the general population and are a form of vulnerability. Our Tenancy Sustainment Strategy, and associated projects, aim to help customers to prevent / reduce debt, manage their money and maximise their incomes, including through education and employment programmes.

Our Tenancy Sustainment Team is responsible for examining the impact of Welfare Reform and developing Paradigm's response to its challenges, including up-skilling staff to enable them to advise and sign-post customers appropriately. In addition, the Team has a limited remit for individual case work.

The Paradigm Foundation

Through The Paradigm Foundation we are able to award grants to individuals and groups in support of a wide range of projects, many of which will support vulnerable people. Our main priorities are to:

- assist people in accessing further education, work and training
- strengthen local communities, especially around self-help and mutual support
- widen financial inclusion and help people on low income and welfare benefits.

Support to specific groups of customers

Working through targeted 'task and finish' groups, we are able to provide support on specific issues.

Support to staff

Paradigm provides a number of services for staff who may be experiencing difficulties in or outside work:

- First assist – a 24-Hour confidential counselling, legal, health and wellbeing service available to all staff and their close family, giving an immediate source of independent advice and support if needed. Face to face counselling can also be arranged.
- Staff supporters – trained staff who can help colleagues either by listening, giving support and practical advice, or by representing them at a grievance or disciplinary meeting.
- Staff Consultative Committee - made up of staff members from across Paradigm, the SCC's role is to represent staff and raise issues to management team during their regular meetings.
- Health checks - all staff are eligible to attend a health screening appointment every two years.
- One-off initiatives – e.g. stress awareness sessions for staff, Well Being days.
- Management support – support from the line manager and/or Human Resources.

2. Role of Paradigm Housing in relation to support provided by other agencies

Often, Paradigm will not be the most appropriate organisation to provide the necessary support and we will seek to access specialist support services provided by our partner

agencies. Our Tenancy Sustainment Team will be proactive in developing links with advice, support and mediation services, which we are able to access for our customers.

In order to ensure the best outcome for our customers, we will:

- ensure that we seek the customer's agreement, wherever possible, prior to making any referral
- provide any practical assistance required e.g. completing paperwork and making appointments
- work to ensure we have effective communication and information sharing arrangements in place with partner agencies
- monitor the effectiveness of outcomes for customers we refer.

Referrals to specialist organisations

We will ensure housing management staff have a good working knowledge of the availability and remit of support agencies and the referral mechanisms in place. In addition, staff members have access to comprehensive information on organisations that may be able to provide specialist advice and support.

Referrals for floating support

Where the Housing Officer identifies significant tenancy support needs, beyond that able to be supplied through Paradigm's housing management service, a referral may be made to the relevant local authority floating support service (e.g. Buckinghamshire Floating Support Scheme).

Referrals to supported housing

Where a customer's support needs suggest they need accommodation based support, we will identify the options available and make a referral to the local authority for assessment for supported accommodation. Access to housing for older people will generally be via the relevant Choice Based Lettings Scheme.

Referrals to social care or health services

Again, we will identify the options available and make a referral for assessment as appropriate.

Appendix 3: Identifying vulnerability

Identifying vulnerability, or potential vulnerability, at an early stage, enables us to make a timely response and, where possible, tailor our services to meet the needs of the individual or household. Where Paradigm does not provide a service direct, identifying vulnerability can prompt staff to signpost people or make a referral to relevant organisations that can provide support.

Proactive arrangements

Paradigm Housing has a number of proactive arrangements in place to identify vulnerable and potentially vulnerable people. All relevant details will be recorded on the Customer Relationship Management (CRM) facility within our Frameworks IT system, which supports awareness around resident vulnerabilities.

Nomination stage: All nominees for housing are assessed in terms of their capability to hold and sustain a tenancy and to determine any support that will be required. Under our Lettings Policy, Paradigm will decline a nomination where (amongst other reasons) we consider the proposed tenant will be unable to sustain a tenancy as a result of a care or support plan not being in place or available.

Viewing: A risk assessment check-list is completed prior to viewing, to ensure any necessary arrangements are put in place for the viewing (e.g. that where the customer has a support worker they are invited to attend, or that translation/signing services are arranged). This checklist may highlight vulnerability issues that had not previously been identified. Viewings are always accompanied as a further means of identifying vulnerability and assessing suitability of the property offered.

Customer Profiling Questionnaire: Completed at sign-up, this includes information on disability and other health issues, communication needs and other support requirements. Housing Officers target visits to longer standing tenants where we do not have customer profile information recorded.

Post lettings visit (PLV): This visit, carried out 2-6 weeks after sign-up, depending on the circumstances of the household, provides a further opportunity to identify any vulnerability concerns / support needs through the use of a SNaR Lite (please see below).

Starter Tenancy visits: Intensive management during the first 12 months of the tenancy includes visits every three months with a view to identifying any issues which may affect the sustainability of the tenancy. Note: We have a risk assessed frequencies of visits approach to enable resources to be targeted to residents most in need of additional management input.

Tenancy Review: No later than 6 months before the end of an Assured Shorthold Fixed Term Tenancy we will undertake a review to decide whether a new fixed term agreement should be granted. Our criteria will include on-going housing need (and also the need for specialist accommodation), ensuring we address the needs of vulnerable customers. We will seek to involve carers, care workers and other advocates in tenancy reviews as appropriate.

Support Needs and Risk Assessments (SNaRs) and SNaR Reviews: SNaR's are undertaken for customers living in Paradigm's Older Persons accommodation and the Welwyn Hatfield Foyer & Small Steps Scheme, in order to assess the level of support required and to inform the customer's Support Plan. Needs and requirements are reviewed

regularly. SNaR Lites are undertaken at the post lettings visit for all other residents on an as needs basis.

Risk Assessment Forms: These are completed as part of Paradigm's policies and procedures for dealing with Anti-social Behaviour including Domestic Abuse and Harassment and Hate Crime and will seek to identify where either the victim or the perpetrator is vulnerable.

Investigations for other breach of tenancy: All investigations of tenancy breaches (e.g. rent arrears or damage to property) will consider vulnerability as part of the assessment process.

Health and Safety Assessments: Risk Assessments and Housing, Health and Safety ratings of hazards / potential hazards will similarly take vulnerability into account.

Reactive arrangements

Reactive arrangements that might result in the identification of someone who is vulnerable, or potentially vulnerable, include concerns expressed or identified by:

- Customer-facing staff (e.g. in customer services, housing management, support services, income recovery, customer involvement, estates services and asset management) during their routine contact with customers
- Maintenance technicians, gas fitters and sub-contractors working in customers' homes
- Board members and senior managers during their contact with customers and staff (e.g. when handling complaints)
- Health or social care professionals, other statutory and voluntary agencies (e.g. care worker, police, probation service, advocacy agencies)
- The individual's family members, carer, friends or neighbours.

Staff members are expected to take every opportunity to update CRM information on Frameworks about peoples' circumstances through their day to day service delivery. There is a patch-based approach within Housing Management that promotes Housing Officers knowing their customers and being able to identify early signs of vulnerability. It is, however, the responsibility of every staff member to report any vulnerability concerns they identify during their work.

A simple Duty of Care report form is available on Frameworks for this purpose and any concern logged is allocated to the relevant Housing Officer to investigate and take action accordingly. Duty of Care concerns cannot be closed down without the approval of the Team Leader, ensuring all concerns are properly followed-up.