



**Trident Group**



a beacon of hope

# Vulnerability Policy

Department: Homes and Communities

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## 1. Purpose and Scope

1.1 This policy outlines Trident Group's commitment to supporting our vulnerable customers and residents, ensuring they can access our services and receive the assistance they need to sustain their tenancies.

1.2 Trident provides additional support and responds flexibly to residents facing exceptional circumstances that increase their vulnerability and ability to manage their tenancy / occupancy agreement. We recognise the need for consistency in our approach and are dedicated to equipping our staff with the necessary information, understanding, and tools to appropriately address the needs of our vulnerable residents. This policy details the steps we will take to achieve this goal.

1.3 The policy focuses on residents who are vulnerable but capable of making their own decisions. For residents assessed as lacking, or believed to lack, the capacity to make decisions, we will work with their appointed representatives.

This policy applies to all residents, household members, and customers. The type of support we provide may vary depending on the tenancy or lease agreement.

1.4 In cases where there is a risk of harm, abuse, or neglect to residents, we will adhere to our Safeguarding Adults Policy, and/or Residents Domestic Abuse Policy, as appropriate.

## 2. Policy Objectives

2.1 Trident understand that some residents may have vulnerabilities that affect their ability to manage their tenancy or engage with the community. We also acknowledge that a customer can become vulnerable during their tenancy. This policy outlines our general approach to addressing these circumstances. We aim to accomplish this by:

- Complying with relevant regulations and legislation, including pre-action protocols, and ensure effective collaboration with support agencies.
- Utilising all available information to identify vulnerable customers and tailor our services to meet their individual needs.
- Recording and documenting customers identified as vulnerable, ensuring this information is accessible to relevant colleagues so services and support can be appropriately tailored, allowing for early identification of vulnerability.
- Identifying support needs and signpost customers to appropriate statutory and voluntary agencies to ensure their needs are met.
- Promoting inclusion and accessibility for all customers.
- Ensuring colleagues do not place customers at risk by putting them in situations that fail to meet their needs and empower colleagues to be flexible in delivering services to accommodate individual vulnerabilities.
- Providing colleagues with the necessary skills, knowledge, and guidance to effectively address various aspects of vulnerability.

- Recording any known representatives who serve as a 'delegated authority' or hold power of attorney to act on the resident's behalf.
- Recording additional needs that customers/ residents tell us about and make reasonable adjustments to our services to meet them.

### 3. Definition

3.1 Vulnerable': Trident defines vulnerability based on the definition used by the Housing Ombudsman as follows: *"Vulnerability is a dynamic state arising from a combination of a resident's personal circumstances, characteristics, and their housing complaint. It may be exacerbated when a social landlord fails to act with appropriate care in handling the resident's complaint. Conversely, effective reasonable adjustments can mitigate this vulnerability."*

3.2 An individual's ability to act, engage, or cope with everyday activities varies and is therefore a crucial factor in assessing vulnerability.

3.3 Our definition acknowledges that vulnerability is a variable state influenced by multiple factors and experiences, such as age, disability, bereavement, mental health issues, domestic violence, and poverty.

3.4 Trident will assess each customer's vulnerability on a case-by-case basis. We will not assume that entire groups of people are vulnerable. For instance, many older or disabled individuals are very independent and active, often not requiring any additional assistance to sustain their tenancy and maintain their independence.

### 4. Legislation

4.1 When implementing this policy, Trident must consider the following:

- The Human Rights Act 1998 and the European Convention on Human Rights
- Pre-Action Protocol for Possession Proceedings
- Mental Capacity Act 2005
- Equality Act 2010
- Social Housing Regulation Act 2023
- Care Act 2014
- Domestic Abuse Act 2021
- Landlord and tenant Act 1985

## 5. Identifying And Recording Vulnerability

### 5.1 Identifying Vulnerabilities

Trident have a responsibility to identify vulnerability of our residents through various means, these may include:

- Residents notifying Trident when they apply for housing, care and support at sign up.
- Any Trident staff member who interacts with residents in person, over the phone, or through other communication channels may identify vulnerabilities and must update our CRM system.
- Contractors working with us notifying Trident of any residents that are showing signs of vulnerabilities and must update our CRM system.
- Referrals from external agencies or organisations.
- During the complaints handling process
- As part of Trident's Anti-Social Behaviour needs and risk assessment process
- As part of our Support and Care planning process

5.2 We expect all our staff to remain mindful of the potential for resident vulnerability, whether from received information or their own observations during any interactions, and to respond with a Trauma Informed approach.

5.3 Trident staff providing services to residents will receive training to recognise potential signs of vulnerability, including:

- Antisocial behaviour
- Non-engagement and repeated failure to respond to communication or not answering the door to visits
- Hoarding, self-neglect, or other behaviours resulting in damage, neglect, or risk to resident's home and/or garden.
- Financial exclusion
- Dementia Friends
- Irregular rent payments and falling into arrears, especially if the tenant previously maintained a good payment history.
- This includes training and refresher courses on mental health first aid, equality and diversity duty of care and safeguarding, trauma informed practice, domestic abuse awareness, complaints handling. handling difficult situations, and drug and alcohol awareness.

### 5.4 - Recording Vulnerabilities

When staff identify a customer's vulnerability that is not already documented in the Housing Management system, they will accurately record this information to ensure our records are up-to-date and accessible to relevant staff members.

5.5 The vulnerability indicators on CRM need regular review. Every staff member engaging with a customer must review the vulnerability information and markers prior to each interaction with the customer.

5.6 Safeguarding concerns will be reported to a Designated Lead Officer for safeguarding and in accordance with our Safeguarding Policy and procedures. This policy outlines our procedures for identifying and supporting vulnerable adults and children at risk, and ensures that Six Principles of safeguarding are applied.

## 6. Communication

6.1 Trident will promote and communicate our services across multiple platforms to effectively engage with our residents, tailoring our approach to meet their preferences. This includes utilising our website, emails, text messages, as well as traditional methods such as printed materials and letters. We're equipped to offer translations, interpreters, or large print documents as needed to accommodate specific requirements.

6.2 Where residents have advised us of their preferred methods of communication this is recorded on our housing management system.

## 7. Services

7.1 In relation to housing and landlord services they provide Trident must take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants.

- Trident must use relevant information and data to:
- Understand the diverse needs of tenants, including those arising from protected characteristics, language barriers and additional support needs
- Assess whether our services deliver fair and equitable outcomes for tenants
- Trident must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants
- Trident must ensure that our services are accessible and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online Trident service if required
- Trident must allow tenants and prospective tenants to be supported by a representative or advocate in interactions about Trident's services.

### Customer Advisors / Customer Contact Team

7.2 The service delivered by the Customer Contact team is the first point of contact for any resident or non-resident calling Trident Group, and our stakeholders and employees. This includes face-to-face interactions, telephone contact, emails and website enquiries.

It is imperative that the Customer Contact team identify and record any vulnerabilities identified from any form of interaction with our residents.

The team offer a trauma Informed approach and Psychologically Informed Environment, ensuring that all visitors into the office are receive a quality customer service.

Trident understands there is a need for human-centric provision of services and an individual approach to all our customers.

## Lettings

7.3 When letting homes, we will review any information we receive regarding vulnerability to ensure that any housing offer is appropriate for the individual and their family. This is part of our commitment to supporting long-term tenancy sustainment and ensuring the safety and wellbeing of our applicants.

Any prospective customer must understand the following before entering a tenancy agreement:

- Their obligation to pay rent, service charges, fuel, water, and other household bills, and to maintain the interior and / or exterior of the property or their property as set out in their lease agreement of the property.
- The landlord's obligations, such as property maintenance.
- The possibility of eviction if they fail to adhere to the terms of the tenancy agreement.

When letting a home, we inquire about the needs of new customers and any vulnerable household members, as well as any existing care and support services they receive. Where appropriate, we may signpost them to an external support agency. We rely on the information provided to us at the application stage, and any lack of disclosure may affect the effectiveness of our service.

Any identified vulnerabilities will be recorded on the person's account, and the housing management team will be informed. We may also advise customers to seek independent legal advice and support to ensure they fully understand their obligations both before and on the tenancy start date.

## Housing Management Services

7.4 Housing officers ensure they have prepared for any viewings and signups by reading and understanding any personal information. This will allow them to make any reasonable adjustments if required.

Within the Tenancy Policy, there will be periodic milestone visits by the Housing Services Team (initially at 6 to 8 weeks, 3 months, 6 months, 9 months and biannually). The wellbeing visit template will be used to record the outcomes of these visits and saved on the housing management system.

## Income Management

7.5 If arrears do arise, we will engage with the resident to identify and tackle the causes. We are aware that one missed payment, no matter how small, could place low-income residents in a financial position that is difficult to recover from. We will: -

- Present information in easily accessible formats and ensure residents understand that they are in arrears and what this means.
- Understand the personal circumstances of the resident and any household members, wherever possible through personal contact with them
- If a resident in arrears is identified as vulnerable or in need of debt advice, liaise with the relevant support agencies
- Make every effort to make an affordable agreement with the resident to repay the arrears.
- Make an application for an APA (Alternative Payment Arrangements) at the earliest opportunity where a resident is in receipt of Universal Credit.
- Signpost residents to debt counselling or other relevant advice
- Accept third party deductions from income support/job seekers allowance as a repayment arrangement where appropriate.
- Provide advice about alternative housing options including signposting to independent advice where rent arrears have arisen due to a change of circumstances such as under occupation.
- If a resident fall into arrears, we will work with them to make arrangements to clear their debt with us, outlining the importance of maintaining regular payment to their account and highlighting the consequences of not doing so.

## Property Services

7.6 All responsive repairs will be prioritised for response in accordance with the following criteria and discussion with the resident:

- Vulnerability of the resident or household – (for example, does the resident’s situation increase the urgency?).

For example, a non-emergency situation where the fault is causing serious inconvenience and the resident is in a vulnerable situation would receive higher priority than where the resident is less vulnerable or where the fault is less severe.

Trident understands that issues can arise throughout the day, evenings and weekends, our Out of Hours team are trained to provide the same level of services when working with vulnerable customers.

## Anti-Social Behaviour

7.7 Working with vulnerable customers forms a central part of Trident Group’s Strategic Plan. Where customers are identified as having support needs, mental health issues, communication needs or drug or alcohol abuse issues, Trident will try and secure effective support for the resident in order to help them modify their behaviour and help sustain their tenancies.

Trident understands the importance of supporting tenants to maintain their tenancy; as part of this we will support vulnerable tenants by referring anyone who we know or suspect has a vulnerability to a specialist support service, providing that they consent to the referral, are willing to receive the support and meet any referral criteria.



We expect tenants to comply with the conditions of their tenancy; however we recognise that some tenants may find this more difficult than others.

When a complaint of ASB is made against someone who we know or suspect to be vulnerable, we will link in with the appropriate support agency and work with them to modify their behaviour. We will also consider alternative housing options which better suits their needs.

## 8. Protected Characteristics

8.1 Trident is committed to embedding principles of equality, fairness, dignity, and respect into our practices and interactions with customers. We embrace diversity and ensure equal opportunities across all aspects of our operations as both an employer and a service provider.

8.2 Trident strictly prohibits discrimination against tenants, staff, visitors, suppliers, or any individuals based on characteristics such as age, sex, sexual orientation, race, disability, religion or belief, marital status, pregnancy and maternity, or gender reassignment. These attributes are collectively referred to as 'protected characteristics' under the Equality Act 2010.

## 9. Residents Lacking Capacity

9.1 In accordance with the Mental Capacity Act 2005, we will liaise with those who have the legal authority to act on behalf of residents who lack capacity. This may include representatives who have or are:

- Lasting Power of Attorney (LPA)
- Deputyship Order from the Court of Protection
- Litigation friend appointed in court proceedings if the resident lacks capacity to litigate
- Appointee appointed by the DWP to manage a person's benefits if they lack capacity
- Independent Mental Capacity Advocate (IMCA) commissioned by the local authority, appointed for individuals aged 16 or over who lack the ability to decide for themselves where to live and have no one, such as a friend, relative, attorney, or deputy, to advise or support them.

## 10. Complaints

10.1 If a resident / customer is dissatisfied with the service they have received from Trident, they can follow Tridents Complaints Policy and Procedure.

Trident is committed to ensuring that people are not disadvantaged by the complaints process. We will ask individuals if they require any reasonable adjustments within our acknowledgement letter and we will make reasonable adjustments for disabled people as required under the Equalities Act 2010.

## 11. Data Privacy and Confidentiality

11.1 Under the Data Protection Act 2018, General Data Protection Regulation (GDPR) 2016, and the Human Rights Act 1998, all personal and sensitive organisational information, regardless of how it is received, is treated as confidential. This includes:

- Anything of a personal nature that is not a matter of public record about a resident, client, applicant, staff, or board member
- Sensitive organisational information

11.2 Trident group employees will ensure that they only involve other agencies and share information when necessary and appropriate.

## 12. Review

12.1 This policy will be reviewed every three years or more frequently in response to changes in legislation, regulatory guidance, good practice, or associated policies and procedures.

12.2 Trident's performance in delivering the services and activities outlined in this policy will be continuously monitored through the line management of frontline officers who interact directly with our customers.

12.3 Any changes to the Vulnerability Policy or process will be communicated to our residents. We also welcome any feedback from residents on how to improve our Vulnerability policy and processes.