

Cottsway Vulnerable Tenants' Policy

Document owner	Head of Housing
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Reviewed by	Vicki Paxford, Communities Manager
Approved by	CLT 22/10/2024
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1.0 Scope of policy

As a Registered Provider we aim to ensure that our tenants (when used in this policy, 'tenants' includes those occupants of accommodation provided by us who occupy under a licence, and references to a 'tenancy' should in that case be read as 'licence') can access appropriate advice and support that will enable them to maintain their tenancy. We are aware that some of our tenants have specific needs that must be met in order to do so.

Cottsway are committed to:

- working with tenants to identify vulnerability and support needs;
- working with other agencies to meet identified support needs;
- taking into account tenants' vulnerability and support needs when delivering services;
- using customer profiling information when engaging with vulnerable tenants and when planning and delivering services.

Working with vulnerable tenants to maintain their tenancies helps to reduce rent arrears, cases of eviction and abandonment and contributes to reducing isolation, building community cohesion, ensuring sustainable tenancies and increasing wellbeing.

2.0 Policy Statement

This policy sets out our approach to service delivery for vulnerable tenants including how we will identify vulnerable tenants (both current and prospective at the stage of allocations and lettings); how we will identify their specific needs and how we will assist them to access support and services that will help them to successfully maintain their tenancies.

This policy will ensure Cottsway staff are able to identify tenants who may be considered to be vulnerable and may be in need of support or other measures to help them sustain their tenancy.

In preparing this policy, we have had in mind the Housing Ombudsman's definition of vulnerability in the context of housing complaints (in its report

'Spotlight on: Attitudes, respect and rights - Relationship of Equals produced in January 2024') as: *"A dynamic circumstance which arises from a combination of a resident's personal circumstances, characteristics and their housing complaint. Vulnerability may be exacerbated when a social landlord or the Housing Ombudsman Service does not act with appropriate levels of care when dealing with a resident's complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced"*. Therefore, we appreciate that levels of vulnerability can be affected by many things, but that housing and housing services are potential factors.

3.0 Recording vulnerabilities

Vulnerabilities and associated preferences will be recorded on our Customer Relationship Management (CRM) system and will be available to all relevant staff. This information will enable staff to provide tenants with suitable assistance and information and to tailor services to meet tenants' needs. All data will be managed according to the terms of our Data Protection Policy.

When a customer contacts us to request a service the staff member dealing with the enquiry will ask what, if any, specific arrangements need to be made to ensure the service will be delivered in a way that meets the customer's needs. Our Tenancy Support and Sustainment Officers also record the number of vulnerable tenants they are working with and the number of referrals made to external agencies.

Whilst it is not possible to identify every situation in which a tenant may be considered to be 'vulnerable' *and* in need of support, a guide to vulnerable groups and indicators of vulnerability is contained with the Tenancy Support (Vulnerable Tenants') Procedure.

4.0 Implementation

We will ensure we meet the aims of this policy at all stages of a tenancy by operating a robust procedure that enables us to identify and refer vulnerable tenants in need of support to appropriate partner agencies and services. We will support the successful implementation of this policy and associated procedure by providing staff with training and information and by building a network of local agencies and contacts.

5.0 Accessing Housing

Cottsway advertise our vacant properties through online choice-based lettings schemes, which we will support applicants to access where necessary. Applicants are asked to indicate their needs when completing their application, which is then inputted into the CRM system as detailed above.

When allocating housing, Cottsway considers the diverse needs of applicants. For example, we allocate homes that are adapted to meet specific needs appropriately and we take into account the vulnerability of applicants when

housing tenants together in shared accommodation. Our Allocations Policy and Procedure sets out the process for allocations.

5.1 Pre-Tenancy Support

Our starting point is to ensure the appropriate support is identified and made available to applicants (who require it) in order to maintain a tenancy, prior to being formally offered a tenancy with Cottsway, through our pre-tenancy assessment by the Neighbourhood Housing Officer (NHO). A tenancy will only be offered if a suitable support package (which may or may not involve partner agencies) is in place and all applicants will be offered a place on our pre-tenancy workshop.

Any applicants identified through the pre-tenancy assessment as in need of additional support will be referred to Cottsway's Pre-Tenancy Support Officer (PTSO) on taking up their tenancy. The PTSO will offer a three-month package of support to ensure the new tenant can understand their responsibilities as a tenant and Cottsway's responsibilities as a landlord. This includes practical help to establish their new home and tenancy, to claim any benefit entitlement and to organise their finances from the start of the tenancy. Care leavers will be offered six months of pre-tenancy support.

Cottsway will work in partnership with the relevant local authority and external agencies to identify and secure suitable support from those partner agencies, where relevant. This includes ensuring that customers in need of housing adaptations are assisted to access such support and apply for relevant funding: please see our Aids & Adaptation Policy for more information.

5.2 New tenants

We will routinely collect customer profiling information, including relevant information on protected characteristics and any support or communication needs, from new tenants at the start of their tenancies using our Household Information Form. We will only use this data according to our Data Protection Policy. This information will be recorded on our CRM system and will be used to help shape services and to identify need.

5.3 Existing tenants

Members of staff who have contact with customers are encouraged to report any concerns regarding vulnerability, including domestic abuse, to the Neighbourhood Team or Tenancy Support and Sustainment Team for further investigation and assessment. Staff will be appropriately trained to recognise indicators of potential vulnerability (see paragraph 6).

Customers who are identified as potentially vulnerable and who may be in need of support will be contacted to arrange an assessment of their situation and will be provided with accessible information and advice on services and/or assistance available, including regarding 'reasonable adjustments' under the Equality Act 2010: see our Equality, Diversity and Inclusion Policy for more information. With the permission of the customer Cottsway staff will take part in case conferences with representatives of other external agencies, as required. For example, where

customers experience domestic abuse, Cottsway will work alongside the relevant local authority and other agencies to provide support and safe housing.

Cottsway will work with local authorities and the police to deter anti-social behaviour in our neighbourhoods. We will provide a victim-centred approach to customers who experience anti-social behaviour or hate incidents, and we will ensure that such incidents can be reported

to us easily. We will consider potential links between a customer's behaviour and an underlying condition, where our customer is a perpetrator of anti-social behaviour, , and we will consider 'reasonable adjustments' under the Equality Act 2010: see our Equality, Diversity and Inclusion Policy for more information.

6.0 Our services

As well as assessing need and sign-posting tenants to relevant support services provided by external agencies, Cottsway's Tenancy Support and Sustainment Officers also provide access to the following services/assistance for qualifying tenants:

- Aids and adaptations (and applications for Disabled Facilities Grants)
- Considering requests for 'reasonable adjustments' under the Equality Act 2010 where a tenant has a 'protected characteristic' and the duty applies
- Assisted gardening for older and disabled persons
- Assisted decorating for older and disabled persons
- Easy Move Scheme
- Food bank referrals
- Citizens Advice referrals
- Access to our in-house furniture re-use scheme
- Access to a Pre-Tenancy Support Officer
- Access to Tenancy Support and Sustainment Officers.

We will also take into account known vulnerabilities when providing services, for example providing a quicker response to requests for essential repairs if a person's vulnerability or health will be adversely affected. Additionally, in recognition of the diverse needs of customers, Cottsway offer a range of communication methods including, where possible, face- to-face contact. Further, requests for translations, interpreters, large print, Easy Read documents and home visits will be considered and provided where possible.

Customers and housing applicants may be supported by an advocate in interactions about our services.

In addition, Cottsway will provide accessible support to ensure that customers with diverse needs have equitable opportunities to influence and scrutinise our strategies, policies and services.

7.0 Training

Cottsway staff will receive training in subjects relating to vulnerability, for example:

- Mental Health Awareness
- Child Protection (safeguarding)
- Protection for vulnerable adults at risk of abuse (safeguarding)
- Drug and Alcohol Awareness
- Equality, Diversity and Inclusion
- Domestic Abuse
- Anti-social Behaviour
- Health and Medical Conditions

8.0 Complaints

If a tenant is not happy with how Cottsway has applied this policy this can be addressed through our Complaints Procedure.

Cottsway will ensure this Complaints Procedure is accessible to vulnerable customers. In addition, customers and applicants may be supported by an advocate in interactions about our services, including when appealing against this policy.

9.0 Responsibility

The Head of Housing has overall responsibility for this policy.

10.0 Monitoring

We have established reporting that enables us to monitor the number of tenants identified as vulnerable and will use this information to assess the demand for suitably tailored services and to identify budgetary implications. In addition, our Equality, Diversity & Inclusion Group regularly monitor the profiling information we hold on our customers, including those identified as vulnerable, to ensure all our customers are able to access our services.

11.0 Equality, diversity and inclusion

We will treat all customers with fairness and respect and will act within the scope of our equality and diversity framework when applying this policy. We recognise that we have an ethical and a legal duty to advance equality of opportunity and prevent discrimination on the grounds of age, sex and sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.

12.0 Other related documents

- Aids & Adaptation Policy
- Allocations Policy and Procedure
- Anti-social Behaviour Policy
- Complaints Policy and Procedure
- Data Protection Policy and Procedure
- Domestic Abuse Policy
- Equality, Diversity and Inclusion Policy
- Safeguarding Policy and Procedure
- Tenancy Support Referrals (Vulnerable Tenants') Procedure

List of Changes:

27.8.21	4.1. Pre-tenancy support	Additional clarity added to the process of pre-tenancy support.
27.8.21	4.3. Existing Tenants	Change of role from Welfare Officer to Tenancy support and Sustainment Officers.
27.8.21	5.0. Our Services	Increased offer to access more services added in this review.
27.8.21	7.0. Recording of Vulnerabilities	Additional clarity of when why and when we record vulnerabilities.
September 2024	1.0 Scope of policy	Definition of the use of the word tenant and addition of 'vulnerability' and 'wellbeing'.
September 2024	2.0 Policy Statement	Various minor amends to wording recommended by Anthony Collins and addition of a paragraph on the Housing Ombudsman's definition of vulnerability.
September 2024	3.0 Implementation	Clarification that referrals for support will be to partner agencies and services.
September 2024	5.0 Accessing housing	Insertion of sentence saying we will support applicants to access online CBL systems if necessary. Insertion of paragraph on allocating homes to meet need including reference to Allocations Policy & Procedure.

September 2024	5.1 Pre-tenancy support	<p>Clarification that the pre-tenancy assessment is completed by the NHO. Addition that support packages may or may not include external agencies. Clarification that pre-tenancy support will be offered when taking up the tenancy, not before.</p> <p>Reference to access to housing adaptations and Aids & Adaptations Policy.</p> <p>Addition of six months pre-tenancy support to care leavers.</p>
September 2024	5.2 New tenants	<p>Clarification that profiling information collected includes information on protected characteristics and support or communication needs.</p>
September 2024	5.3 Existing tenants	<p>Insertion of reference to domestic abuse. Insertion of reference to 'reasonable adjustments'.</p>