



# **Vulnerable Persons Policy**

## **2024 - 2027**

**Issued by Housing & Community Safety**

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## **Vulnerable Persons Policy Quality Record**

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## **1. Scope of the policy**

- 1.1 This policy sets out Nuneaton and Bedworth's approach to identifying, assessing, and recording information regarding tenants with vulnerabilities, in order to provide services which take into account their needs.
- 1.2 For the purposes of this policy, Nuneaton and Bedworth will define a vulnerable person as one who has a condition, disability, or a personal circumstance, which means that without support or intervention, any of the following may be true:
  - They are at higher risk of abuse or neglect
  - There is detriment to their overall wellbeing
  - Their tenancy is put at risk
- 1.3 Included in this definition are people who receive or need additional care and support services. We recognise that not everyone who has a disability is vulnerable under the definition of this policy. We also recognise that vulnerability is not always permanent, and that a person's needs may change over time.
- 1.4 For the purposes of this policy, Nuneaton and Bedworth will define an accessible service as one that someone with a disability, communication, or access need, can use, receive, benefit from, and engage with, in a similar amount of time and effort as someone who does not have such a need.
- 1.5 While this policy applies in principle to all Nuneaton and Bedworth tenants, some services and support may be specific to different types of tenure, or different situations. For example, some types of assistance may be exclusive to tenants rather than leaseholders.
- 1.6 This policy is applicable to all Nuneaton and Bedworth tenants and household members.

## **2. Policy statement**

- 2.1 We will record known vulnerabilities, disabilities, circumstances, communication or access needs that we are made aware of. This will enable our staff to make appropriate adjustments when delivering services. For example, whether we should provide information in a specific format (such as Braille or large print).
- 2.2 We can become aware of a tenants vulnerability where:
  - They tell us (self-identify)
  - Information is provided by an external organisation, e.g. social care or a support service.
  - Information/concerns are fed back to us by a member of staff or one of our contractors
  - Concerns are raised by family or neighbours

- 2.2 We will handle and process personal data about vulnerability in accordance with the current Data Protection Act and General Data Protection Regulations.
- 2.3 We will ensure that vulnerable tenants receive the services and support they need to sustain their tenancy.
- 2.4 We will comply with the Equality Act 2010 whilst assisting vulnerable tenants to sustain their tenancies and access our services, and in doing so, we also aim to:
- Increase tenant satisfaction levels and confidence in our services
  - Make good use of partnerships to meet tenant needs, building and maintaining a good reputation with our partners
  - Reduce the need for enforcement action
  - Become better at recognising and responding to potentially 'hidden needs'
  - Provide high quality services that are accessible
- 2.5 We will provide training to our staff to recognise potential signs of vulnerability, including (but not limited to):
- Antisocial behaviour linked to mental illness
  - Someone being a victim of antisocial behaviour, or domestic abuse
  - A resident having a large debt or credit on their rent account
  - Self-neglect, Hoarding, or poor property condition
  - Not reporting repairs, granting access requests, responding to correspondence, or otherwise making contact with Nuneaton and Bedworth Borough Council.
  - Limited or no understanding of the English language preventing them from communicating effectively with our staff or other agencies
- 2.6 We will promptly report any safeguarding concerns in line with our Safeguarding Policies and Procedures.
- 2.7 We will consider what additional support, consideration or adjustment in service might be appropriate for vulnerable tenants. This will include (but is not limited to):
- Making sure that correspondence is provided in an appropriate language/ format.
  - Making personal contact with vulnerable tenants where appropriate rather than relying on written communication.
  - Working collaboratively with known support services.
  - Referring or signposting tenants for appropriate advice and/or support and following up on referrals.
  - Checking the tenant's understanding of their situation, rights and responsibilities, and the consequences of action or inaction on their part.
- 2.8 We recognise that the circumstances, preferences and needs of each person are different. Where it is possible, adjustments to our service should be person-centred, focussing on the needs of each individual, and agreed in collaboration with them.

- 2.9 We will proactively work to improve services by:
- Developing good practice case studies and lessons learnt from cases to train/inform staff.
  - Using information about the needs of vulnerable tenants to plan and provide future services and support.
  - Using the data that we hold to identify other tenants who may be vulnerable.
- 2.10 We will take a multi-agency approach and work with partner organisations to provide a co-ordinated approach. This will be enabled through the use of:
- Service level agreements and information sharing protocols
  - Referrals to support providers and/or statutory services, ensuring that we follow up on the outcomes of these referrals
  - Signposting to support services, advocacy and advice agencies
- 2.11 We will use proportionality and encourage assistance and support in the event that we need to take legal action against a tenant who is vulnerable.
- 2.12 In line with the Mental Capacity Act 2005, we will liaise with those who have legal authority to act on behalf of our tenants who lack capacity. That may be a representative who has or is, a/an
- 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 who are appointed where a person aged 16 or over lacks ability to act to decide for themselves where to live and has no-one, such as a friend, relative, attorney or deputy to advise or support them.

### **3. Monitoring and review**

- 3.1 We will monitor cases and performance on an ongoing basis, including where we have made reasonable adjustments, and also reviewing the information that we hold on our systems relating to vulnerability which will help us to proactively offer inclusive and people-centred services.
- 3.2 We will ensure effective implementation of this policy by publishing on our website and on our intranet. We will ensure overview sessions are held for teams that will be responsible for implementing the policy and make these sessions available for any new colleagues or refreshers.
- 3.3 We will monitor attendance of these sessions, and colleagues who have confirmed having read the document.

- 3.4 The effectiveness of this policy will be continuously monitored, and the embedding of the policy scrutinised after 12 months.
- 3.5 This policy will be reviewed every 3 years unless business need, regulation or legislation prompts an early review.

#### **4. Related Policies and Procedures**

- 4.1 Care Act 2014
- 4.2 ASB Procedure
- 4.3 Safeguarding Policy and Procedure
- 4.4 Allocations Policy
- 4.5 Management Move Procedure
- 4.6 Equality Policy

#### **5. Equality**

- 5.1 This policy and associated procedures will apply to all. Nuneaton and Bedworth Borough Council is committed to promoting equality of opportunity and to eliminating unlawful discrimination on the grounds of any of the protected characteristics under the Equality Act 2010.