

VULNERABILITY POLICY

1. INTRODUCTION

ISHA's vision is to co-create homes and communities where people can flourish, and one of our six pillars of the strategic plan is setting residents off on a secure footing & helping create the conditions for people to flourish in their homes. One of the ways we enable this is through the delivery of services that respond to the needs of all our residents, including those who are vulnerable.

This policy sets out how we will support our vulnerable residents to give them the best chance and opportunity to flourish in their homes.

We recognise that at points during our lives, we all experience moments of vulnerability, and we do not aim to categorise everyone as vulnerable. Therefore, for the purpose of this policy, ISHA categorises vulnerable as anyone who experiences difficulties with everyday living to the extent that they require additional support to sustain their tenancy or access our services, so that they are not disadvantaged. A person may be categorised as vulnerable because of a single temporary incident i.e. an incident of domestic abuse, or at different times, e.g. a recurring mental health problem. There are certain groups of people who may find it more difficult to access our services due to a key characteristic e.g. those where English is not their first language, people with physical disabilities, etc.

This policy applies to tenants of any tenure or tenancy type. It does not apply to shared owners or leaseholders; however, we will provide advice and signposting to these residents when appropriate.

2. AIMS

We aim to adopt a consistent approach to ensuring that any resident who is experiencing vulnerability has equal access to our services, and where necessary, reasonable adjustments are made to how we deliver our services to enable this. A summary of how we do this is set out below, but more details can be found in the relevant policies.

3. DETAILS

Access to housing

Our allocation policy sets out how we allocate our homes. Most of our homes are allocated to nominations from the local housing registers in the boroughs where we work. Wherever possible, we provide our letters, contents of sign-up packs and tenancy agreements in easily readable format so that they are accessible to people who may not have English as a first language. A pictorial interpretation of the tenancy agreement is available for people who experience difficulties in reading.

ISHA have an internal transfer list where tenants in priority need can register for a transfer. Vulnerable tenants who experience difficulty using their home due to domestic abuse, or medical needs can be registered on the transfer list.

We will assist vulnerable tenants, who are registered for a mutual exchange, to search for homes if they are unable to access the Homeswapper website due to their vulnerability e.g. elderly people without access to a computer/smartphone or those where English is not their first language.

As part of the housing application process all tenants are required to complete a risk assessment where any additional support required to settle into their home can be identified.

Communication

We will advertise and communicate about our services using a variety of platforms to engage with our residents in a way which meets their needs. This includes our website, emails, text messages and more traditional methods, including hard copy print and letters. We can provide translations, interpreters, or large print documents to meet identified needs as appropriate.

We ensure that our website is as accessible and user-friendly as possible. Our accessibility features include the ability to change the language displayed.

We recognise the role of carers, advocates and personal representatives, and all tenants have the right to nominate a third party to liaise with us on their behalf. Where appropriate, we shall take their views into account when consulting vulnerable customers on issues which affect them.

Income recovery

When taking action to recover rent arrears, vulnerability risk assessments are completed early in the process, and this is reviewed at a management level prior to any decisions to proceed with eviction proceedings.

Repairs and maintenance

Residents are responsible for carrying out minor repairs and maintenance in their homes as set out in the repairs responsibilities for tenants leaflet. Where a repair, which is the responsibility of the tenant, is outstanding and urgent, ISHA will complete the repair and recharge the tenant. However, we recognise that some tenants may not be able to fulfil their repair responsibilities due to their vulnerability. When deciding whether to recharge, we will take into consideration their age, disability and any other vulnerability which may prohibit them from fulfilling these responsibilities.

ISHA will pay for any repairs resulting from damage caused to a tenant's home during an incident of domestic abuse. We will also cover the costs of lock changes or additional security required to improve the security of the home of a victim of domestic abuse.

Where appropriate, a resident may ask for a security code word to be used to gain access to their home. If given, this will be available to the member of staff or representative to give added security to residents who feel especially vulnerable.

We will support the provision of aids and adaptations that help residents enjoy independence, privacy and dignity by accessing aids and adaptation funding.

Fire safety

ISHA recognises that some of our residents have complex needs that may put them at risk of fire or injury in their homes. Residents who smoke in their homes and/or are hoarders and/or have limited mobility would be at greater risk of fire. When we identify a tenant who falls into this category, the Outreach Officer will carry out a Person-Centred Fire Risk Assessment (PCFRA) to help residents live safely in their homes and ensure that any mitigation is put in place to enable this.

We are committed to working in partnership with the London Fire Brigade and any other agencies to protect vulnerable tenants in their homes and to work in a person-centred way to protect residents.

Tenancy support

ISHA employs specialist Outreach and Support Officers who work with tenants who may require additional support to help them sustain their tenancy. The role of the Outreach Officer is to provide short-term support, which may include assisting in making a DHP application, supporting a tenant to make a furniture grant application, etc. If a tenant requires long-term support, the Outreach & Support Officer will refer the tenant to a more appropriate support provider, such as social services.

When they are supporting a new tenant, it will be about supporting them with what they need to do to settle into their new home; ensuring they have adequate furniture, providing assistance for them to apply for benefits and providing guidance and advice on how to manage their income so that they are set off on a good start.

Where it is identified that an individual does not have the mental capacity to make decisions for themselves, we will work with carers, advocates and legal representatives of vulnerable residents and customers to ensure they are able to access the services they need in line with the Mental Capacity Act 2005.

We are committed to working in partnership with other agencies that support our vulnerable residents and customers.

Dealing with anti-social behaviour

We recognise that anti-social behaviour (ASB) or harassment may be directed towards a vulnerable individual or household because of prejudices held by a perpetrator. Such prejudices may be targeted, for example people living with physical disabilities, learning disabilities or mental health issues. We also recognise that in some instances, vulnerable residents may be reluctant to report ASB to ISHA and may be less able to cope with what may traditionally be regarded as low level anti-social behaviour.

We will be alert to these types of incidents and encourage people to report them to us. Our Neighbourhood Officers have a regular presence on estates, and are encouraged to report any victimisation which they may witness to the Tenancy Officer.

We take a victim-centred approach to all reports of ASB and carry out a victim vulnerability risk assessment in all cases. This tool helps us measure any additional risks to the vulnerable victims.

We recognise that perpetrators as well as victims of ASB can be vulnerable adults, too. Therefore, before commencing legal proceedings, we will ensure that proportionality assessments are carried out in line with the public sector equality duty to make sure that our actions are fair, reasonable and proportionate.

We will be proactive in raising awareness about prejudice and in encouraging tolerance and respect for others.

Staffing

We will ensure that staff working with vulnerable residents are trained to comply with best practice, including by having periodic Disclosure and Barring Service (DBS) checks and safeguarding training.

4. HEALTH AND SAFETY

When applying this policy, staff should ensure that they adhere to the organisation's lone working policy where site visits or visits to residents' homes are required.

5. EQUALITY AND DIVERSITY

We recognise that some residents may not be able to fulfil their responsibilities as a tenant due to their vulnerability. This policy summarises how we level up access and service delivery so that these tenants have equal access to our services.

We will record the ethnicity and diversity of our residents who use our outreach and support services so that we can monitor whether this service meets the needs of the diverse groups that we serve.

6. TRAINING

All staff in the Housing and Neighbourhoods directorate will receive training/briefing on the use of this policy.

7. DATA PROTECTION CONSIDERATIONS

ISHA will ensure that we comply with data protection principles in the enforcement of this policy. We will only process personal data once the data subject has given their consent.

8. STATUTORY AND REGULATORY FRAMEWORK

- Mental Capacity Act 2005
- Equality Act 2010
- Data Protection Act 1998 and General Data Protection Regulation
- The Care Act 2014

9. MONITORING

Managers will be responsible for monitoring the implementation of this policy, ensuring that reasonable adjustments are made for vulnerable residents when delivering goods and services.

10. REVIEW

This policy will be reviewed every three years or sooner if there are any changes in legislation or our associated policies which may impact this policy.

11. ASSOCIATED DOCUMENTS

- Anti-social behaviour policy
- Domestic abuse policy
- Repairs policy
- Health and safety policy
- Lone working policy
- Income recovery policy

Reference	Version	Created	Author	Review	Leadership Team approved
Vulnerability policy	1	March 2023	Deeion Sharpe, Head of Housing Management	March 2026	April 2023