



# ongo Vulnerable Persons' Policy

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## **1. Our policy is...**

- 1.1 To recognise that different customers need different levels of support from a variety of agencies. We will help where we can within the limitations of the different services we provide. If customers have complex needs which require more intensive support than we can offer, we will try to find ways to provide that support in partnership with other agencies.
- 1.2 To recognise our moral and legal responsibilities to refer customers to appropriate agencies or services for assessment.
- 1.3 To recognise that customers have the choice whether or not to engage with support providers; provided there are no barriers to that engagement (e.g. language, learning disability, and untreated mental illness). We will take all necessary steps to remove barriers that might prevent customers from receiving support.
- 1.4 To recognise that some customers may choose to refuse support even where there are no barriers to their engagement. In these circumstances, if the customer is a Ongo Homes tenant and they are failing to meet the conditions of their tenancy, we will proceed to enforce the tenancy agreement or use other legal remedies available.

## **2. It applies to...**

- 2.1 All ongo customers.

## **3. Because we want to...**

- Enable vulnerable customers to successfully manage their homes and have the skills and confidence to understand and abide by the conditions of their tenancy;
- Outline how we will identify and support vulnerable customers.

## **4. We will...**

### **4.1 Tell you what our approach to vulnerability is:**

It can be difficult to define who is vulnerable and to what extent they need support. This is because a person's needs can fluctuate over time or be dependent on the situation they are in. It really involves taking a holistic look at the person and the circumstances at the time.

Although the following factors on their own do not indicate that a person is vulnerable, they can help you build up a picture of the customer's situation:

- Those who are or have been a victim of domestic abuse;
- Those who are at risk of harassment on the following grounds:
  - Race
  - Sex
  - Sexual orientation
  - Religion/Belief
  - Transgender
  - Age

- Disability
- Marriage/Civil Partnership
- Pregnancy/Maternity
- Those who have mental health needs
- People with a physical or sensory disability
- People who are substance misusers
- People who are homeless or at risk of homelessness
- People who have learning difficulties
- Offenders, including those with mental health needs
- Asylum seekers/refugees
- Teenage parents and their children
- Lone parents and their children
- Older, frail people
- Children and young people at risk of leaving care
- People with chronic health conditions
- People with caring responsibilities
- Socially excluded individuals, e.g. those who would like company but may not speak to another person for 48 hours or more

#### **4.2 Other possible indicators of vulnerability**

As explained above, age or disability alone (for example) doesn't signify that a person is vulnerable – you also need to look at their circumstances to see what else is going on. Factors such as those listed below could indicate vulnerability:

- Chaotic lifestyle
- Difficulty coping with daily living tasks
- Difficulties with childcare responsibilities
- No experience or a past difficulty in maintaining a home
- Unreliable rent payment pattern
- Difficulty with basic budgeting/financial problems
- Language or other communication difficulties or barriers
- Reluctance to engage with others
- Unable to carry out self care tasks/self neglect
- Physical frailty
- Neglect of property or garden
- Self isolating behaviour

#### **4.3 Possible effects on ability to maintain tenancy or home**

We recognise that the vulnerable people described above may have barriers or issues outside their control that affect a person's ability to maintain their tenancy or home, which may lead to problems such as:

- Inability to maintain home or garden
- Keeping home in reasonable condition

- Rent, service charge or mortgage arrears
- Anti-social behaviour
- Neglect of property, including hoarding.

#### **4.4 Opportunities for identification**

There are many opportunities for our staff or those working on behalf of us to identify potential cases of vulnerability. Many of these opportunities will arise for front-line officers in the course of undertaking their day to day duties. It is important therefore that we are all aware of the importance of reporting suspected vulnerability even if they do not possess in-depth knowledge of behaviour, symptoms & solutions - the key message therefore is to report cases where *'something doesn't look right'*

Key opportunities for identifying vulnerability occur during:

- The lettings process
- Tenancy visits
- Support service visits and activities
- Repairs and planned works visits by our staff and contractors
- Estate walkabouts
- Collection of customer profile information
- Community group meetings/activities including Resident Associations and other Resident Involvement structures
- Multi-agency meetings including case conferences
- Community Development projects and activities
- Contact via telephone, face-to-face or social media
- Breaches of tenancy including investigation of complaints or anti-social behaviour reports

#### **4.5 Determining the course of action**

Essentially there are 4 courses of action depending on the customer's individual needs and circumstances:

- Support delivered directly by us;
- Referrals to specialist support providers;
- Interventions carried out by us; or
- Contractor signposting to relevant support agencies.

#### **4.6 Training**

All customer facing staff will be equipped with the skills to identify vulnerabilities, know their responsibilities and actions to be taken.

#### **4.7 Use of contractors**

We will ensure that all contractors who are likely to come into contact with customers comply with the terms of this policy and are equipped with the skills to deal with vulnerability issues.

## **5. Making sure we do what we say...**

### **5.1 Responsibilities**

The Head of Customer & Support services is responsible for:

- Ensuring all staff that come into contact with customers are equipped with the skills required to identify vulnerable individuals and to understand responsibilities and actions needed.

The Procurement Manager is responsible for:

- Ensuring all contractors that meet with our customers adhere to their own or OH's Vulnerable Person's Policy;
- Identifying contractors that need to undertake awareness training around the identification of vulnerability and expected responsibilities.

We will work in partnership with others to ensure vulnerable customers are identified and supported, for example:

- North Lincolnshire Safeguarding Adults Board
- North Lincolnshire Safeguarding Children's Board
- Health & Wellbeing Board
- Equality & Diversity Partnership
- Safer Neighbourhoods Group
- MARAC
- MAPP
- Financial Inclusion group
- F.A.S.S.T
- Children Leaving Care Partnership
- North Lincolnshire Strategic Housing Group
- Domestic Abuse Forum
- Frail and Elderly Partnership

Wherever possible, we will work with our partners to produce data and information sharing agreements.

### **5.2 Monitoring**

We will monitor how we are doing by:

- Looking at complaints and satisfaction data around vulnerability issues
- Looking at vulnerability as part of our Equality and Diversity monitoring
- Looking at vulnerability as part of the Safeguarding reports we prepare for the OH Board

## **6. Other things to bear in mind are...**

6.1 This policy is not intended to be used in isolation but in conjunction with other ongoing policies and procedures including:

- Anti-Social Behaviour Policy
- CBL Policy
- Data Protection Policy

- Dignity and Respect Policy
- Disciplinary Procedures
- Domestic Abuse Policy
- Employee and Contractor Codes of Conduct
- Equality and Diversity Policy
- Money Handling Policy
- Mental Capacity Guidance
- Professional Boundaries Policy & Guidance
- Recruitment and Retention Policy
- Safeguarding Policy and Procedures
- [Local safeguarding Adult's Board Safeguarding Adults Board Policy & Procedure \(2014\)](#)
- Local Safeguarding Children's Board Procedures and Guidance (2014)

6.2 There are many pieces of legislation and regulation relevant to this policy, including:

- Relevant safeguarding legislation (see Safeguarding Policy)
- Care Act 2014
- Crime and Disorder Act 1998
- Data Protection Act 1998
- Equality Act 2010
- Human Rights Act 1998

## 7. We'll look at this again...

7.1 In three years time, or sooner if anything changes.

## 8. What the words mean...

Reference	Definition
Abuse	'Abuse is a violation of an individual's human and civil rights by any other person or persons'. It may involve 'a single or repeated act, or omission occurring within a personal or closed relationship where there is an expectation of trust, which causes harm or distress to a person'. Friends, strangers, family members, and professional staff can all be guilty of abuse. Abuse can include physical, psychological, sexual, financial, discriminatory abuse and acts of neglect (Dept of Health, No Secrets Guidance 2000).
Child	The Children Act 2004 defines a 'child' as, a person under the age of 18, or a person aged 18, 19 or 20 who is being looked after by a local authority, or a person aged 18, 19 or 20 who has a learning disability.
Child Protection	Child protection is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are at risk of suffering

	<p>significant harm.</p> <p>Effective child protection is essential as part of the wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced. (Source: Working Together to Safeguard Children).</p>
Customer	This includes tenants, residents, clients and anyone who is receiving a service from ongo.
Mental Capacity	<p>Mental Capacity refers to the ability of a person to make decisions about their own life. Some people have difficulties in making such decisions. This is called 'lacking capacity'.</p> <p>Under the Mental Capacity Act (MCA) there are laws governing who can make decisions on someone else's behalf, which help to safeguard vulnerable people.</p>
Parent	The term 'parent' is used as a generic term to represent parent, carers and guardians.
Staff	For the purpose of this policy, 'staff' relates to anyone employed by ongo, including agency workers, apprentices, fixed term workers, consultants, secondees, Board members and volunteers who work on behalf of ongo.
Vulnerable Adult	'Someone who is aged 18 or over and who is or may be in need of community care services by reason of mental health or other disability; age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'. (No Secrets, Dept of Health 2000).