

Vulnerability Policy

1.0 Introduction and Scope

- 1.1 This document covers our policy on vulnerability and highlights the ways in which we will identify tenants that we might describe as being vulnerable. It also describes how we will work with these tenants to ensure they are provided with the support they need to enjoy their homes and sustain their tenancy.
- 1.2 The toolkit will also highlight the importance of helping those who are vulnerable achieve independence whilst living in our neighbourhoods. This Policy should be used in conjunction with the Neighbourhood Management toolkit the Tenancy Management toolkit and the Community Involvement and Engagement Toolkit.
- 1.3 The scope of this policy covers:

Gentoo Group	X
Gentoo Homes	
Gentoo Developments Ltd	
Gentoo Genie	

It applies to:

General Needs rented properties	X
Supported Housing	X
Sheltered Housing	X
Leasehold/Shared ownership	X
Rent to Buy properties	

Market rented properties (domestic)	
Temporary Accommodation	X
Stock owned but not managed by the Group	
Communal Areas, including those relating to Leasehold/Shared Ownership properties	
Commercial Property (offices, depots etc)	
Stock managed by Gentoo on behalf of a third party	X
Garages and outbuildings	
Remote plant (district heating, electrical pumps etc)	
Curtilage	

2.0 Regulation and Legislation

2.1 The Executive Director (Operations) will ensure this Policy has regard to all legislation, regulation and best practice. The Policy takes into account the following legislation:

Tenancy Breaches

- Housing Act 1988
- Anti-social Behaviour Act 2003
- Equality Act 2010

Data Protection

- Data Protection Act 2018

Care and Protection

- Care Act
- The Children's Act 2004
- Homelessness Act 2002
- Human Rights Act 1998

3.0 Links to Organisational Goals

3.1 Our vision and values set the direction and culture of the Group. They ensure that the business is aligned around the desire to create sustainable homes and communities and to improve the lives of our customers. The vision and

values ensure that all of our people understand Gentoo's ethos and are clear about what is expected of them and the contribution they can make.

Vision:

Great Homes – Strong Communities – Inspired People

Values:

Do the right thing
Make a difference
Work together
Keep learning
Give all you've got

The Group's Strategic aims are:

Deliver outstanding service to customers so that people and communities thrive
Actively manage our assets and develop new homes to meet local needs
Support our people to deliver our vision and live our values
Work with others to build effective partnerships
Be well governed and financially strong

4.0 Monitoring and Review

- 4.1 This Policy will be fundamentally reviewed every 3 years, or in line with business need.
- 4.2 The Business Assurance team will monitor this Policy in line with the Group Audit plan.
- 4.3 The Local Service Offers can be found in Appendix 1.

5.0 Roles and Responsibilities

- 5.1 The Executive Director (Operations) is accountable for ensuring this policy has regard to all legislation, regulation and best practice.
- 5.2 Overall accountability for this Policy lies with the Executive Director (Operations).
- 5.3 All staff in Gentoo are responsible for the delivery of this policy.
- 5.4 Any proposed changes or recommended amendments to this policy will be reported to the Executive Director (Operations) for approval prior to implementation.

6.0 Our Policy Statement

- 6.1 As part of the Group's vision to build strong communities, we will strive to ensure that every one of our tenants have the opportunity to access our services and sustain their tenancy.
- 6.2 We may consider someone to be vulnerable where they are “**an individual or household experiencing difficulties with everyday living.**’ This does not mean that everyone who meets the definition is vulnerable, but we will use it as a guideline when assessing the needs of our tenants.
- 6.3 We want to empower tenants to feel in control of their everyday life and will achieve this by effective profiling, early intervention and appropriate support provision.
- 6.4 We will seek to proactively identify people who may require assistance at the earliest opportunity and aim to ensure that we secure the most appropriate, tailored solution for that tenant and their household. We will therefore alter our service delivery to vulnerable tenants to ensure they receive an excellent

service and are not placed in a dangerous or disadvantaged position. However, such changes will be reasonable adjustments.

- 6.5 To enable our tenants to remain in their homes and live as independently as possible, we are committed to ensuring that every opportunity has been provided to support them in their tenancies. This Policy will therefore be used to amend or temper other policies when it is apparent that there is a vulnerability which needs to be considered.
- 6.6 Where necessary, we will take enforcement action against tenancy breaches, however we will evidence that we have offered support repeatedly, offered to make reasonable adjustments and ensure any action is proportionate.
- 6.7 Every tenant is treated as an individual when assessing vulnerability and determining the level of support required.
- 6.8 We will draw upon the expertise of our staff and partner agencies to formulate the most appropriate solution in every scenario.
- 6.9 We want to empower tenants to feel in control of their everyday life and will achieve this by effective profiling, early intervention and appropriate support provision.
- 6.10 Gentoo will remain committed to the principles of diversity and inclusion throughout the organisation and aim to:
 - Meet the needs and choice of people from all backgrounds
 - Ensure that our services are relevant, responsive and sensitive to the needs of our existing and future customers
 - Ensure that all sections of the community in which we work have equal access to our services.
- 6.11 Our vulnerability policy will ensure that our tenants are treated as individuals and with fairness and respect.

7.0 Policy Outcomes

7.1 This vulnerability policy seeks to:

- Treat tenants with support needs as individuals
- Make reasonable adjustments where individuals require additional support in obtaining and maintaining a tenancy with Gentoo Group
- Ensure responses and support offers are joined up and flexible and tailored to life events or personal circumstances.
- Encourage vulnerable tenants to make their own choices and decisions about the services they want

8.0 Training

8.1 Gentoo will ensure that all staff receive the appropriate training to enable them to carry their responsibilities as stated in this policy.

9.0 Records

9.1 All records regarding vulnerable tenants including all contacts and attempted contacts, offers of support, any agencies involved etc. should be stored on the appropriate computer systems i.e. Orchard and/or Streetwise.

10.0 User Defined Characteristics (UDCs)

10.1 The Group uses UDCs which hold information about individual customer requirements, for example communication needs, disabilities etc. This information is accessible in the Orchard system and is transferred onto the handheld technology and/or printed works orders utilised by trade staff so they have this information in advance of visiting a tenants' home.

11.0 Data Protection

11.1 The privacy of tenant information is taken very seriously and Gentoo is committed to taking all reasonable steps to process and protect any personal

information that is provided to us by tenants. This is in accordance with the Data Protection Act.

- 11.2 Gentoo will use the information tenants provide to meet responsibilities and perform duties in the allocation and management of housing accommodation. On occasion information may be required sharing with third parties in order to fulfil these duties.
- 11.3 The information tenants provide to Gentoo will be held on computer and paper-based systems, which may be used for the prevention and detection of fraud or any other crime. Appropriate measures are in place to ensure the information that tenants share is secure and only available to authorised staff.
- 11.4 Each tenant can exercise their data protection rights by contacting the Data Protection Officer, further information can be found in the Privacy Statement on the Gentoo website and it is available in other formats on request.

Appendix 1

Local Service Offers

Description	We will
Safety, Support and Crisis - working in partnerships we will enable vulnerable customers to sustain their tenancy and live well in their neighbourhood.	<ul style="list-style-type: none">• Provide supported accommodation where necessary• Offer advice, support and guidance bespoke to your circumstances