



Vulnerability Policy

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Approved by:	Executive Director (Operations)
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For the full version history of this policy, see the back page	

Please avoid referring to printed versions of this policy.

Printed versions may quickly go out of date –contact the Policy Team for support and advice.

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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	

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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.

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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 and Toolkit 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.

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- 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 and Toolkit.
- 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

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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 Gentoos 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.

An equality assessment can be found in Appendix 2.

- 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

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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
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Appendix 2

Equality Assessment

1. What is this Equality Assessment being completed on?

Specify a clearly defined service area – too big becomes too hard to complete.

Vulnerability – Our policy on Vulnerability and our approach to delivering services to vulnerable tenants and ensuring they get the right support they need.

2. Does the policy/service/project/process/function outlined above have an impact on people? Please tick relevant box

People means staff, customers and other stakeholders who are either involved in it, in receipt of it or affected by it, either directly or indirectly.

<input checked="" type="checkbox"/>	Yes – High impact (<i>reasonable or significant level of direct impact/contact, requiring a reasonable or significant level of knowledge and understanding of diverse groups</i>)
	Yes – Low impact - (<i>infrequent contact which involves minimal interaction at a level which requires only basic awareness</i>)
	No - <i>If you select “no”, add an explanation below to justify your assessment.</i>

.....
.....

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If you have selected “no”, then subject to your justification above being validated, there will be no need to complete this Equality Assessment further.

If you have selected “yes”, please continue....

3. Which groups of people* (“protected characteristics”) is it impacting? Please tick relevant box (See notes)

<input checked="" type="checkbox"/>	All groups
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<input type="checkbox"/>	Only specific groups
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**The “protected characteristics” are specified by equality legislation. They are: age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation. If you are selecting “All”, you still need to think about whether the “service” may be of greater relevance/ have greater impact for any one or more of those groups, and include details.*

Please detail which groups and why

This Policy is relevant and impacts upon our tenants who we define as having a vulnerability and as we have a diverse tenant base, this toolkit is likely to impact upon all protected characteristics. The tenant survey which we complete also shows (at April 19) that 11.8% stated they had a vulnerability, of those over 50% have mental health issues. 39.9% stated they have a disability.

4. Please justify how you can be confident that this policy/service/project/process/function it’s tailored and sensitive to individual needs, that it doesn’t discriminate, and that it promotes equality of opportunity / levels the playing field? (See notes.)

Remember within every group there will be individual and different needs. See attached guidance/things to think about. Please list the measures you have in place to give you confidence.

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- Policy is aligned / cross referenced to Gentoo's Diversity and Inclusion commitment, and also specifically commits to identifying vulnerability (which would include individual needs related to protected characteristics) and working with all staff to respond appropriately. It also seeks to ensure that, where a vulnerable person has breached their tenancy, we will ensure that any action taken is proportionate and legitimate.
- Vulnerability training will be delivered having considered accessibility of venues, delivery styles and methods appropriate to individual needs of those attending, in liaison with the Group's dedicated Learning and Development Advisors.
- User Defined Characteristics (UDCs) hold information about individual customer requirements, for example communication needs, disabilities etc. this information is accessible in the Orchard ICT 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 going to a customer's home. This enable staff to make reasonable adjustments to services where necessary.
- Corporate letterhead used for letters to customers. This advises of availability of information in alternative formats, and of interpretation services.

Staff / 3rd parties implementing it:

- Staff training – all Gentoo staff are required to attend mandatory diversity and inclusion training
- Staff have access to relevant guidance and information to increase awareness and understanding of diversity and inclusion training in relation to delivering services, via staff handbooks, newsletter articles and Stronger Together workplace section.

5. Please detail the checks and balances that you have in place which give you confidence that the above measures are in place and being implemented effectively. (See notes)

If you are unsure about effectiveness, or if as part of completing this assessment you have identified further work that is required in order for you to feel confident, please detail this in section 8 below.

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- Policy Reviews – The Business Assurance Team will audit the Policy in line with business need and report findings to Risk and Audit Committee and Gentoo Group Board. An equality assessment/review will be included as part of this audit.
- The Policy will be fundamentally reviewed every 3 years, ensuring outcomes are achieved.
- Orchard housing management systems hold key data about vulnerability and relevant individual needs.
- Staff attendance at mandatory diversity and inclusion training is recorded.
- Tenant surveys give us accurate live data regarding tenant vulnerabilities.

6. The duty to foster good relations is about tackling prejudice and promoting awareness and understanding between those who share a protected characteristic and those who don't share it. Is this duty relevant to this "service"? Please tick relevant box. (See guidance notes)

This question will not be relevant to all assessments. See notes.

<input checked="" type="checkbox"/>	No - This duty is not relevant to this "service".
<input type="checkbox"/>	Yes - This duty is relevant to this service. *

*If this duty is relevant, please detail below how the "service" is fostering good relations.

Not applicable

If you identify further work that is required to comply with this duty, add actions in section 8 below.

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7. Are you confident that the checks and balances that you have in place, effectively mitigate the equality and diversity risk to the Group? Please tick relevant box.

Level of confidence that checks and balances mitigate risks in respect of.....	Very confident	Not confident /More work required*	Not confident
Legislation/legal action in relation to equality & diversity (e.g. harassment or discrimination, or failure to give due regard to all elements of the Public Sector Equality Duty)	√		
RSH Regulation in relation to E&D	√		
Reputation in relation to E&D	√		

(* Use Q.8 to specify your proposed actions to remedy your lack of confidence)

8. Actions to be completed following this EA:

Please detail the actions you will put in place following this EA and the timescales for your next review.

Action	Responsibility	Timescale
Ongoing review taking place of the UDCs. This will ensure the relevant ones are 'pop-up' UDC's and as such are more clearly visible on accessing a customer's details	Lucy Malarkey	Ongoing

Completed by: Mel Smith

Date: August 2019

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Version Control

Version	Reason	Issuer	Date
2.0	Amended format	Sarah Treadwell	23/3/18
2.1	Changes made as per staff consultation	Mel Smith	May 2019
2.2	Changes made as per customer consultation	Mel Smith	10.6.19
2.3	Final changes made – add in Data Protection paragraph, proof read	Mel Smith	6.8.19
3.0	Approved by Michelle Meldrum	Sarah Treadwell	12.8.19