HOUSING POLICY

People with Needs Policy 2024

LONDON BOROUGH OF HARROW

People with Needs Policy

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1. Purpose and scope

This policy sets out Harrow's approach to supporting council tenants, their household members and leaseholders who are facing barriers accessing services due to their individual needs. We have defined how we record and assess these needs which include those who are considered to have "vulnerability needs". to support residents in relation to accessing our services. See Appendix 1 for a definition.

This policy relates to residents who have needs but have capacity to make their own decisions. Residents assessed by Adults Services or other professionals as lacking capacity may be referred to appropriate alternative services. The focus of this policy is to ensure that residents with vulnerable needs" can be identified and offered services to enable equal access to housing services. This support may be supplied by London Borough of Harrow or by other statutory and voluntary services.

2. Objectives

The objective of this policy is to ensure that residents who have needs receive the support they require to sustain their tenancy and access all the services they require to live as independently as possible in their home. To achieve this, we aim to:

- Use all data available about our tenants to identify and record any specific needs.
- Keep all records up to date.
- Tailor our services to consider residents needs to ensure residents still receive a good level of service.
- Record preferred contact methods along with details of any known representatives acting as a 'delegated authority' or with power of attorney to act on the resident's behalf.
- Make sure that all data held about our tenant's is regularly reviewed and managed in accordance with the statutory guidance and legislation and specifically the Data Protection Act 2018.
- Refer to statutory agencies and external partner support agencies where appropriate.
- Make safeguarding referrals whenever needed.

3. Definitions

How We Identify and Define Vulnerability Needs

The London Borough of Harrow can identify "vulnerability needs" in several ways including the following:

- Housing Needs officers can capture data at the stage when a person makes an application for housing.
- Housing Officers can identify vulnerability needs during the sign-up stage, from tenancy audit visits, rent visits and during benefit reviews.
- Council staff and contractors including maintenance staff can contact Harrow Resident Services to make them aware of concerns about residents with vulnerability needs.
- Caregivers and family members of the resident can contact Harrow Resident Services.
- Reports via external agencies or organisations such as police, social workers, wardens or probation officers.

- Through local knowledge gathered or observed through day-to-day housing management activities e.g. neighbourhood walkabouts, repairs and maintenance visits or as a result of a tenancy breach.
- We will attempt to ascertain whether a resident has vulnerability needs anytime they contact us throughout the tenancy or where we are made aware of potential vulnerability needs.

We expect contractors and outside agencies to inform us of any observations made to identify a resident with potential vulnerability needs. Contractor and sub-contractor's staff should report any relevant observations to their supervisors and managers who should feedback directly to Harrow Resident Services. All Council staff should follow safeguarding procedures.
Safeguarding Adults
Harrow Safeguarding Children

All housing staff should be aware of the following protected characteristics under the Equality Act 2010 which can help to identify a person with vulnerability needs, although identifying with one or more of these characteristics doesn't necessarily mean that someone is vulnerable.

Protected characteristics

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership (in employment only)
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

Personal and social characteristics

- Health and abilities – physical health impairment, sensory impairment, cognitive impairment, mental health issues, developmental condition or addictions.
- Access and skills – lack of language, literacy, numeracy, digital access or technical skills.
- Personal circumstances – major life events such as bereavement, redundancy, loss of income, divorce or a relationship breakdown, being the victim of domestic abuse, anti-social behaviour or harassment.
- Financial – low knowledge of financial matters or low confidence in managing money, difficulty in enduring financial or emotional shock due to debt or a one-off unexpected expense; low or unstable income.
- All staff who regularly come into contact with residents, are trained to recognise additional potential signs of vulnerability which may include:
- A detrimental change in a person's physical appearance
- A detrimental change in the appearance of a resident's home
- Hoarding
- Self-neglect
- High amount of credit on rent account
- Static arrears
- Not reported repairs within a long period of time
- Constant unnecessary contact with Harrow
- Frequent anti-social behaviour reports
- Failure to allow access to our contractors and staff for scheduled works and visits.

We define a resident who has vulnerability needs as someone with any condition or circumstance that makes them less able to take care of themselves or protect themselves from exploitation. Vulnerability needs are assessed by the relevant officer (see chapter 4 Definitions) on a case-by-case basis so that we can support individuals according to their needs.

Vulnerabilities can be defined through a variety of indicators, including but not limited to:

- Mental health issues
- Learning difficulties
- Elderly with frailties
- Unable to perform self-care tasks / significant daily tasks
- Partner/carers unable to provide support with current problems
- Severely impaired mobility and/or risk of falls
- Sensory impairment
- Severe physical health problems or a debilitating illness or disability
- Victim of hate crime
- Domestic abuse survivor
- Care leaver
- Lone parent under 25
- No previous experience of successfully managing independent living.
- Significant problems with finances/budgeting
- Asylum seeker or refugee
- Ex-offender or housed from prison
- Alcohol or substance misuse or gambling addiction
- Recent history of street homelessness
- Living alone and self-isolating or self-neglecting
- Hoarding
- Language/literacy difficulties

These indicators may be cross-referenced against each other and other data to help identify vulnerabilities as it is recognised that where a tenant comes within one category above, this alone may not indicate vulnerability or falling within several categories may indicate a higher level of vulnerability.

Vulnerability indicators may include cross-referencing data relating to:

- High credits on rent account
- Static arrears
- No reported repairs within a defined period of time
- Excessive repairs within a defined period of time
- Anti-social behaviour reports
- Failure to allow annual gas safety checks.

Our data base holds information on residents who have needs including vulnerability needs. This information is stored on our IT system where we use alerts to inform staff of potential vulnerabilities so that we can tailor the service accordingly. The alerts are updated after Tenancy Audit visits or after relevant communication.

If we believe that a person's vulnerability needs could lead to significant risk of harm, abuse, or neglect, we will follow our Safeguarding policies:

- Adult Safeguarding Policy
  Safeguarding Adults policies, procedures and protocols – Staying safe – London Borough of Harrow

- Children Safeguarding
  London Child Protection Procedures and Thresholds - Harrow Safeguarding Children Board (harrowscb.co.uk)

Hoarding

Hoarding is separately identified from other vulnerabilities as research in this area suggests that what works is a multi-agency, multi professional and multi-disciplinary approach and is therefore likely to require additional support and action.

The effects of the behaviours associated with chronic hoarders can be very problematic and costly to rectify. For example, responding to concerns or complaints raised by neighbours or family/friends; housing repairs; deep cleaning; home fire safety checks which may in some cases require a bespoke or innovative solution.

Where cases of hoarding are identified or suspected, staff should follow the "Referral process for cases involving hoarding" and have regard to the Multi-Agency Protocol "Working with Difficult to Engage Vulnerable Adults (including chronic hoarders)".

4. Statement

We are committed to ongoing development of our knowledge around vulnerabilities and understanding what that might mean for residents. We understand that having a disability doesn't necessarily mean a person is vulnerable. We are committed to being a supportive, diverse and inclusive equal opportunities organisation. We feel it is important not to label residents as "vulnerable" but to understand what their need is and how that need may place them at a disadvantage. Housing staff receive mandatory training to embed this in all their interactions with our residents and when delivering our services.

Housing staff will periodically receive training to help them recognise residents and leaseholders who may have vulnerability needs. We work with support workers across the organisation as well as external agencies, family members, or other professionals and advocates to support residents. Our staff are aware of the possibility that a resident may have a vulnerability need which can be identified from information received or from their own observations during interactions with residents.

Communication

We tailor communication with residents in a way that best suits their individual needs. We do this by assessing any communication needs and recording them on our systems. Residents preferred method of communication is also noted. We'll inform residents of any communication support available to them and staff will adjust their communication style depending on the need, for example:

- Allowing more time to understand information
- Giving more time for the door to be answered during visits
- Providing a sign language interpreter and text messages for those with hearing impairments
- Sending letters in Braille, large print or audio formats for the visually impaired
- Using language interpreters
- Residents can also have correspondence sent to a nominated person who will act on their behalf.

Recording vulnerability

We'll record any known vulnerability need on our internal systems, including any information provided by the tenant or known access needs and whether there is a delegated authority for someone to speak to us on the tenant's behalf.

A system of alerts is incorporated within the housing data base and is reviewed as part of the Tenancy Audit process to ensure they reflect a resident's current status. Residents may be removed from the list where existing data is no longer relevant.

Safeguarding concerns raised by officers, contractors or third parties should be forwarded to the relevant Housing Officer and passed to the Safeguarding Team who will also record information on their system. There is a separate policy and related processes for the safeguarding of adults and children to ensure statutory agencies are involved when we have a concern.

Residents lacking capacity

We will liaise with those who have legal authority to act on behalf of residents who lack capacity. Below is a list of those who may have authority to act on a resident's behalf:

- Lasting Power of Attorney (LPA)
- Deputy-ship 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 for themselves in relation to where they live and has no-one, such as a friend, relative, attorney or deputy to advise or support them.
- An instructed solicitor.

Information sharing

We share data in accordance with the London Borough of Harrow's policies on UK GDPR https://www.harrow.gov.uk/council/data-protection/2 which requires us to share information with appropriate agencies in circumstances where there are serious concerns for people's health and safety. The law allows us to disclose information as well as request information from relevant authorities where it works towards reducing crime and anti-social behaviour or significant risk of harm.

We will communicate information about a resident's needs to our contractors and any other relevant stakeholder whenever necessary to ensure services are delivered appropriately.

We shall gain consent from residents where possible before sharing information. This may not be possible in circumstances where a safeguarding issue has been identified.

Colleagues will always respect confidentiality and not share any information given in confidence unless justified by the assessed risk to the resident or required by law.

5. Legal and Regulatory Requirements

The Regulator of Social Housing's (RSH) Tenant Involvement and Empowerment Standard, requires registered social landlords, including local authorities, to provide choices, information and communication that is appropriate to the diverse needs of tenants and to demonstrate that they understand the different needs of tenants including in relation to equality and to tenants who have vulnerability needs.

The Housing Ombudsman Complaints Handling Code states that landlords should comply with the Equality Act 2010 and may need to adapt normal policies, procedures and processes to accommodate individual needs.

6. Related Policies and Strategies

This Policy should be read in conjunction with:

- Equality of Opportunity Policy.pdf
- Safeguarding Adults policies
- Children Safeguarding Board - London Child Protection Procedures and Thresholds - Harrow Safeguarding Children Board (harrowscb.co.uk)
- Multi-Agency Protocol "Working With Difficult to Engage Vulnerable Adults"
- Aids and Adaptations
- Housing Allocations full scheme
- Anti-social Behaviour Policy
- Reasonable Adjustment Policy
- Domestic Abuse Strategy (to come)
- Customer Access Strategy

References

- Tenancy Agreement
- Adult Safeguarding Policy
- HSAB Multi agency protocols for self-neglect
- London Borough of Council data protection
- Housing services strategies and policies
- Aids and Adaptations Policy
- Equality Impact Assessment template

7. Compliance and monitoring

Managers are responsible for ensuring that all relevant staff members are trained on Vulnerable Needs. Refresher training should be carried out each year and managers should record any areas of noncompliance and take appropriate corrective actions.

8. Review

This policy will be reviewed periodically to address legislative and regulatory change, best practice or operational issues.

9. Equality Impact Assessment

Equality Impact Assessment (to come)

Appendix 1 – Factors in defining vulnerability

The categories below are some common factors that could lead to a person having vulnerability needs and may need to be taken into consideration when making an assessment for vulnerable needs. (Not an exhaustive list).

Factor 1

- Older people (particularly those 75 years or older)
- 16 – 21-year-olds
- Disabled people
- Care leavers
- Lone parents under 21 years old
- Refugees or asylum seekers

Factor 2 Ability to effectively engage in order to access relevant services

- Families with children who have a vulnerability need
- Digitally excluded
- Vulnerable to cuckooing
- Ex Army service personnel
- Learning disability
- Mental illness
- Autism Spectrum Disorder
- Permanent mobility impairment
- Long term critical illness
- Addictions including gambling and substance misuse
- Low level of literacy including financial
- Language barriers
- Elderly and frail
- Loneliness and social isolation
- Caring responsibilities

Factor 3 Exceptional life changing event (people may not have factors 1 and 2 but may have experienced a life changing circumstance recently)

- History of street homelessness
- First time living independently
- Bereavement following the death of a loved one
- Relationship breakdown
- Loss of occupation
- Diagnosis of a serious illness
- Recently left care as a young person
- Have experienced sexual abuse or rape
- History of trauma including any type of abuse
- Recently discharged from hospital or other institutional care
- Periods of sustained physical or mental illness at home
- Multiple debts and unable to meet basic needs e.g., fuel or food poverty
- Pregnant women
- Recently given birth, experienced still birth or a miscarriage
- Recently released from prison after a custodial sentence or engaged with the justice system
- Families with children excluded from school
- Ex Army service personnel