



Vulnerability and Individual Support

Our mission is to enhance the Life Chances of residents and service users through providing great homes, first class services and working in partnership to build sustainable communities.

1 Scope

- 1.1 This policy applies to all customers across the Circle Housing Group ('Circle'). It is particularly aimed at tenants and their families living in general needs accommodation without structured support, although the principles apply to all Circle customers.

2 Policy Statement

- 2.1 Circle believes that all customers should receive services and support that meets their individual needs. We believe that equality means that treating people fairly is not the same as treating everyone in the same way.
- 2.2 We believe that everyone has the right to be treated with dignity and respect, to have his or her opinions heard, and to exercise free choice. We are committed to providing support to residents and service users to enable them to live in their homes independently.
- 2.3 We recognise that some of our customers are vulnerable or have individual support needs due to one or more of a variety of causes and that they may benefit from tailored or enhanced services in some circumstances.
- 2.4 We will aim to identify vulnerability so that we can understand their individual needs and act accordingly. We recognise that vulnerability is often not a fixed condition, so we will take a view on this based on the individual's situation and reflect changing circumstances.
- 2.5 Circle recognises that there is a degree of crossover between vulnerability, individual support needs, and safeguarding children and adults at risk. This policy should be read in conjunction with our policies on Safeguarding Adults and Safeguarding Children.
- 2.6 Circle is committed to Equality, Diversity and Inclusion. This policy forms part of our resources reflecting our actions to embed these values into every area of work and all parts of our business.



3 Defining Vulnerability

- 3.1 There are several legal or recognised definitions of 'vulnerability', related to factors such as homelessness, eligibility for assistance, safeguarding children and adults from abuse, and direct payment of benefits.
- 3.2 This policy does not seek to replace established definitions, but to promote a broad approach to identifying potential vulnerability in order to support our customers as individuals and provide services and support in a manner appropriate to their needs.
- 3.3 Our focus is on promoting open and positive dialogue with our customers and encouraging them to tell us that they need individual support or a tailored service in certain circumstances.

Supporting staff to identify potential vulnerability and individual support needs

- 3.4 We don't believe in a one-size-fits-all approach, or applying arbitrary definitions or criteria to people. Vulnerability can be a variable state and can occur at different points in a person's life. It can be temporary, periodic and recurring but also ongoing and develop over time. We recognise that some of the examples set out below *may* have an impact on a person's vulnerability or individual support needs, but that this list is not definitive, because everyone is different.
- 3.5 Factors may include whether someone is physically frail or has a physical or learning disability or difficulty which may affect their ability to carry out their day-to-day affairs. However, it is important to note that age and disability are not automatic indicators of vulnerability, and just because someone is elderly or disabled does not necessarily mean they are vulnerable.
- 3.6 Indicators may also include whether a person suffers from a long-term illness or condition (such as a terminal illness or mental health problem), shows signs of self-neglect, or has an addiction which is damaging their health (e.g. to alcohol or drugs).
- 3.7 There are other factors, related to particular life experiences, which could indicate vulnerability. For example, this includes where a person has experienced abuse, domestic violence, anti-social behaviour, hate crime or harassment. It is important to remember that those who care for other vulnerable people may be subject to abuse. Other important examples include social isolation, which may include that related to geographical remoteness, physical or sensory impairment, or mental health problems or living in a household which may work with social services or other support agencies.
- 3.8 People may have individual support needs at particular points in life, for example, where they are suffering from bereavement or temporary emotional stress due to a major change such as a relationship breakdown, or where they have recently been discharged from hospital, or where there are children under 12 months in a

household. We also recognise that in instances where an ex-offender is reintegrating into a community, they may require individual support.

- 3.9 In situations where an individual is unable to demonstrate the capacity to make a decision, they may also be in need of additional care and support. Where an officer suspects that an individual does not have capacity, they should raise this with their line manager at the first available opportunity as further action may need to be taken.

Looking out for initial signs

- 3.10 There are a number of signs that someone *may* be vulnerable or in need of individual support. In a housing context, these include, but are not limited to the following:
- Falling into arrears or debt
 - Being the perpetrator of anti-social behaviour
 - Being the victim of crime, anti-social behaviour or harassment
 - Disputes with neighbours
 - Damage to the person's home
 - A detrimental change in the person's physical appearance
 - A failure to respond to correspondence or to answer the door when visited
 - A failure or unwillingness to meet ones personal care needs
 - Hoarding or other behaviour which results in the person's home/ and or garden becoming damaged, neglected or otherwise unfit for occupation.
 - Having to leave their previous settled accommodation due to domestic violence, or because it was unsuitable due to ill health or disability.
- 3.11 Vulnerability and individual support needs will be considered at all contact points with customers and we provide our staff with guidance to help them identify potential vulnerability and to provide tailored or enhanced services where these will help. Equality and Diversity training is mandatory for all staff at Circle.
- 3.12 If our staff identify a reason that might lead to vulnerability or requiring individual support, they will ask the customer about this so we can understand his or her needs. No one is obliged to discuss their needs and we will respect individuals' privacy.
- 3.13 Our neighbourhood staff and repairs operatives carry 'concerns cards', which can be used to note and report any concerns they spot when visiting the homes of our customers. This is something we are piloting in two RPs and rolling out across the Group over the next year.
- 3.14 After a staff member or contractor has reported their concern, we will contact the resident to discuss their support needs if this is appropriate to the concern raised. Again, no customer is under the obligation to discuss his or her needs or disclose personal information.
- 3.15 We promote a positive reporting culture within Circle in relation to Safeguarding Adults and Children. This is something that we extend to vulnerability - we will

support any member of staff or volunteer who reports their concerns in good faith. It is better to report a concern and be wrong than not to report it at all.

Diversity monitoring data

- 3.16 As a landlord and service provider, we are expected to collect diversity data by our regulator to ensure we understand our customers. We use these statistics when planning our services, so that we can understand the impact of new policies or projects on vulnerable people.
- 3.17 We also use some of this information to help us provide tailored services to individuals. For instance, if a customer tells us that they have a visual impairment, we can send him or her information in a format that meets their needs, whether that is (for example, audio CD, large print, or in Braille).
- 3.18 We welcome self-identification of vulnerability or individual support needs. If customers think that their circumstances might mean that they might be vulnerable in certain situations, or that they will need to receive services in a different way, they can let us know.
- 3.19 We understand and respect the privacy of our customers and no one is obliged to tell us any information that they don't want to. We comply with the Data Protection Act and our [Data Protection policy](#).

4 Vulnerability and Risk of Abuse

- 4.1 We recognise that vulnerability and risk of abuse are connected. Safeguarding Adults is the term for all work to help 'adults at risk' stay safe from significant harm.
- 4.2 Circle is committed to a zero tolerance policy against any kind of abuse to anyone, and recognises that safeguarding adults who are at risk of abuse is everybody's business. Across the organisation, everybody can play a part in preventing, detecting and reporting abuse and neglect.
- 4.3 Just because a person is old, frail or has a disability, it does not mean they are inevitably 'at risk'. Such a person may have the mental capacity to make informed decisions about their own safety and how to protect themselves from harm.
- 4.4 Instead, an adult at risk's vulnerability to harm and abuse is determined by a range of interconnected factors. See our [Safeguarding Children](#) and [Adults](#) policies for more information.
- 4.5 Our work on vulnerability and identifying individual support needs is a key element of proactive safeguarding work.

5 Responding to Vulnerability

- 5.1 As there are so many aspects of vulnerability, it is difficult to list all of the possible actions we may take to support customers. This section gives an overview of some of the things we can do.

Repairs priorities

- 5.2 The health and safety of our customers is a top priority for Circle. We will aim to prioritise repairs jobs for vulnerable customers where the nature of their vulnerability (such as physical frailty, mobility problems or their impairment) means the repair has implications for their health and safety.
- 5.3 All repairs jobs are allocated into one of three priority categories: *Routine*; *Urgent* and *Emergency*. Where a repair job would normally be classed as routine, the status would be upgraded to Urgent or Emergency. The emergency response, as a rule, results in making the repair safe, and in majority of case leads to a new repair to address the problem fully.
- 5.4 All parts of our organisation prepare plans called Business Continuity plans. These set out our responses to adverse events or emergencies that affect our ability to carry out our work. Within these, there are key actions to prioritise services for vulnerable people.

Anti-Social Behaviour and Harassment

- 5.5 Research by the Equalities and Human Rights Commission ([EHRC](#)) has highlighted that disability-related harassment is widespread but often unreported and unrecognised by public authorities.
- 5.6 Circle has updated its policies covering anti-social behaviour and harassment. These focus on promoting awareness and reporting of disability-related harassment and reiterating our commitment to supporting victims and witnesses of anti-social behaviour, harassment, hate crimes and domestic violence.
- 5.7 See our [Anti-social behaviour](#) and [Domestic Violence](#) policies.

Aids and Adaptations

- 5.8 Circle is committed to providing adaptations to the homes of residents with disability and mobility needs to enable them to live safely and independently for as long as it is appropriate and possible.
- 5.9 We will provide guidance and support where appropriate in accessing an Occupational Therapist assessment and completing a Disabled Facilities Grant application to a Local Authority.
- 5.10 We can assist the resident in applying for a mandatory Disabled Facilities Grant. We will work closely with Local Authority partners to ensure this process is efficient and effective.
- 5.11 Registered Providers (RPs) locally provide in-house funding for minor adaptations which are not provided by social services. Where a need for an adaptation is high and a resident is likely to endure considerable and unacceptable delay as the result of a Disabled Facilities Grant application, RPs will consider funding larger adaptations as well. See our [Adaptations](#) policy.

- 5.12 In general, residents of individual general needs, market and intermediate rent and leasehold properties are responsible for their own fire safety. However, we will consider individual needs of residents who tell us they have a disability such as a hearing impairment, and install appropriate equipment to ensure they are alerted in the event of a fire. See our [Fire Safety](#) policy

Recharges

- 5.13 We will not recharge customers where their vulnerability has prevented them from upholding their responsibilities under their tenancy or support agreement.
- 5.14 See our [Recharges](#) policy

Invicta Telecare

- 5.15 [Invicta Telecare](#), one of the partners in Circle Housing Group, offers telecare services to customers across the country. This service enables vulnerable people of all ages to live independently in their own homes with the support of trained operators available 24 hours a day via a telecare alarm unit.
- 5.16 This is an optional paid-for service that is separate to the housing management function performed by RPs. Invicta offers a pendant that customers can push if they feel unwell, have an accident or need reassurance, which will activate an alarm. A range of sensors and detectors are also available that can sense risks within the home such as smoke, floods, gas or if a saucepan has been left on the hob. If triggered it sends a message through to experienced operators who can help with the problem before it becomes serious.

Tenancy Checks

- 5.17 Circle Registered Providers operate a programme of tenancy checks, where staff members make home visits to confirm that the rightful tenant is occupying the home.
- 5.18 This action to reduce tenancy fraud also allows us the opportunity to visit residents in their homes to identify together any support needs, requirements for aids and adaptations, communication preferences, etc. We can also identify any repairs issues and take appropriate action.
- 5.19 See our [Tenancy Checks](#) policy.

Communication

- 5.20 It is important that we ask for and understand our customers' communication needs and preferences. We can provide information in various formats including large print, audio format, and Braille.
- 5.21 We will work with non-English speaking customers to understand their individual requirements and decide the most appropriate translation or interpreting services to offer, taking into account both the need for fair access and value for money. We encourage the use of telephone and face-to-face interpreting services to promote

full understanding of rights, responsibilities, services and opportunities for our customers.

- 5.22 Where Circle is aware that a tenant has literacy difficulties, we will endeavour to ensure that all communication with the tenant is either through face-to-face contact or via the telephone. Circle Registered Providers may offer training for residents to support literacy and so they can actively get involved and have their say on how local improvements and services are delivered.
- 5.23 We will endeavour to make contact at least once a year with customers identified as vulnerable. We will discuss any requirements for support, aids and adaptations, or referrals to support services.
- 5.24 Some customers may be at health risk during periods of extreme heat or cold. We will telephone vulnerable customers in these circumstances and identify any areas for support, such as advice about keeping warm or more proactive interventions such as home visits where this is appropriate to the circumstances.

6 Partnership Working

- 6.1 We recognise that our repairs contractors have a valuable part to play in identifying and responding to individual support needs. Our contractors visit the homes of our customers every day to complete repairs and for some residents this will be the only face-to-face contact with Circle throughout the year.
- 6.2 Our contractors will be encouraged to report any concerns following their visit to the resident's home. These concerns may relate to support requirements for the resident or family members, health and safety issues or other repair jobs required, safeguarding concerns, or other issues. We will work with our contractors to provide a straightforward mechanism for operatives to report concerns and for these to be communicated to the appropriate Circle team.
- 6.3 We will only pass data about customers to our contractors where this is directly related to carrying out the repair. For example, a contractor operative would be told to allow extra time for the resident to answer the door, rather than the details of the resident's disability.

Community Partners

- 6.4 Registered Providers in the Circle Group work closely with partner organisations in their communities to provide specialist advice and support.
- 6.5 A key part of responding to vulnerability and meeting a range of needs is working with community partners and providers of specialist services. Each housing provider in Circle works to develop a network of partner agencies to provide referrals to specialist support. We will help our customers get in touch with these organisations and signpost to other services.
- 6.6 Where partnership working requires passing personal or sensitive information as part of a referral, we will ask residents for their consent for this to happen. We have

data confidentiality agreements in place with suppliers and partners to protect the security of our customers' data.

- 6.7 Only in situations where there is an immediate risk to health and safety will we pass on data without individual consent. For example, where during a home visit we identify a fire risk linked to vulnerability, we will inform the Fire Authority to report our concern.

7 Equality and Diversity

- 7.1 This policy outlines our approach to identifying and supporting vulnerability and individual support needs as a key part of our commitment to Equality, Diversity and Inclusion.

- 7.2 At Circle,

- **Equality** means that treating people fairly is not the same as treating everyone in the same way.
- **Diversity** means acknowledging and respecting individual differences and demonstrating respect and fairness in how we work with and support others.
- **Inclusion** means creating an environment where we value others and are ourselves valued.

- 7.3 Enhancing Life Chances through promoting equality, valuing diversity and encouraging inclusion is our responsibility as a landlord, service provider and employer.

- 7.4 We recognise the role of carers, advocates and personal representatives. Where appropriate, we shall consider their views when consulting vulnerable residents on issues that affect them.

Version History

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