

# Diverse Needs and Vulnerabilities Policy

## 1 Purpose

We recognise that some customers are vulnerable and may need additional support to live well, sustain their tenancies/leases and live safely and comfortably in their homes. This policy sets out our approach to customers who consider themselves vulnerable, as well as those who may not, yet require us to take a different reasonable approach to tailor our service to meet their diverse need.

Where this policy refers to vulnerability, it applies equity to customers with a diverse need to access support in line with legal and regulatory requirements, professional and industry codes of conduct and the ethical standards that we set ourselves as part of MTVH's values.

## 2 Scope

This policy and accompanying procedures apply to:

- Customers and household members, who live in accommodation owned or managed by MTVH
- Customers we deliver community-based services to
- All colleagues, including agency, bank workers and volunteers
- All stakeholders/partners commissioned by us

This policy does not replace our **Safeguarding Children and Safeguarding Adults at Risk policies** and procedures. Where colleagues identify a risk of harm, abuse, or neglect, these Safeguarding issues must be reported by following our safeguarding policies and procedures.

If a customer living in MTVH accommodation or using MTVH support services, also has a social care package commissioned by a local authority or health authority, changes in their needs or escalating risk, their allocated health or social care professional must be the point of contact for further help.

If a customer lives in an MTVH Supported Housing property, then the supported housing management structure provides this additional support as part of housing management. Needs must be escalated to the relevant Supported Housing team.

We aim to achieve the outcomes vulnerable customers need, whether short or long-term, therefore we have adopted the 3 R's (Recognise, Record & Respond) strategy and this is referenced in this policy.

## 3 Our Approach

### 3.1 Defining vulnerability

For the purpose of this policy, a vulnerable customer is defined as an adult living in an MTVH property, or receiving services from MTVH, who through a combination of personal circumstances, requires support to comply with the conditions of their tenancy or lease.

MTVH recognises that a customer could be vulnerable due to a life challenging event or condition, or a combination of factors. In some cases, these factors may include a protected characteristic under The Equality Act (2010).

We also recognise that vulnerability may be caused by personal circumstances, or external situations, which can occur at different points in a person's life, and for varying durations. As such, customers could

require support in the short, medium, long-term, or permanently. Examples may include but are not limited to:

- Physically disability that limits mobility
- Frail or elderly customers
- Sensory impairment, e.g., visual impairment, deafblind and hearing impaired
- Learning Disabilities or Difficulties
- Mental health diagnosis, e.g., anxiety, depression
- Customers who are recently bereaved
- Moving from supported living or leaving Care
- Experiencing or fleeing domestic abuse or harassment
- Customers who lack capacity to make decisions (under the Mental Capacity Act 2005)
- Exploitation, including modern day slavery and cuckooing
- Loss of employment due to ill health

We have a duty to make sure the services we provide are fair and accessible to all our customers. To do this, we will consider what reasonable adjustments we are able to make in light of a customer's needs or vulnerabilities. Any reasonable adjustments will be considered on a case-by-case basis.

### **3.2 Identifying Vulnerable Customers (RECOGNISE)**

We identify and capture customer vulnerability information at multiple points throughout their customer journey, including but not limited to:

- Pre-tenancy assessment completed at the viewing - this will determine whether the property on offer is suitable for the customers' needs
- 6-week Settling-in Visit
- Home visits
- During compliance checks or repairs
- Phone calls from the customer, or in person visits
- Following a concern raised by a relative, friend, neighbour or by an external agency, e.g. a social worker
- Customer Complaints Webform
- ASB or Customer Accounts casework
- During the home buying process
- During the post completion new homes welcome or defects liability visits

All colleagues and contractors undergo mandatory training during their probationary period, refreshed annually, which covers how to identify and welfare concerns and the correct process for escalating these internally.

There are several indicators we use to identify potential vulnerability, which may prompt a more in-depth conversation with a customer, including but not limited to:

- Repeatedly not responding to contact, including home visits or pre-arranged appointments
- Rent arrears or reported debts/financial hardship

- Frequent reports of damage to property
- Deterioration of the appearance of a property or person
- Signs of hoarding behaviour
- Reports of anti-social behaviour
- Extensive and/or recurring requests for support
- Customers who experience hate crimes or harassment
- A disability or other protected characteristic which affects someone's ability to manage their tenancy/lease or stay safe and well in their home

We recognise that belonging to a protected characteristic does not necessarily mean that someone is vulnerable or needs support.

### 3.3 Supporting Vulnerable Customers (RESPOND)

Where a customer presents as vulnerable or needing support, frontline colleagues are trained to make customers aware of the support, which is available to them, including:

- A "front door" team who complete initial risk and needs assessment to determine immediate support required, including liaison with external agencies
- A dedicated team, who work intensively and holistically with households around a variety of issues
- Financial advice, including debt and welfare benefits support/advice
- Small grants to individuals and households experiencing financial hardship or crisis
- Local housing teams embedded in the communities
- Various other projects and initiatives

## Ways we support our customers

### Mental Capacity

A customer who has been identified as vulnerable does not necessarily lack capacity to manage their own affairs. The main principle when supporting customers is that there is always a presumption of capacity, and support should be offered and delivered with that person's informed consent, for further details regarding mental capacity, please refer to our **Mental Capacity Policy**.

### Public Sector Equality Duty

As a private organisation carrying out a public duty, we are bound by the Public Sector Equality Duty (PSED), which is a legal requirement for public authorities to consider how their policies and decisions affect people protected by the Equality Act 2010, in particular how we can eliminate unlawful discrimination and advance equality of opportunity for protected groups.

We place a strong emphasis on our Public Sector Equality Duty throughout our policies and procedures, ensuring that the needs of protected groups are considered, and where appropriate, prioritised, for example prioritising victims of hate crimes and domestic abuse in our Transfer Policy.

In addition to this, as part of making any decision which might affect customers with a tenancy or homeowners, we undertake an Equality Act and Proportionality Assessment to make sure that our

decision is reasonable, takes into account that customer's personal situation, and that we are not indirectly discriminating against someone due to a protected characteristic.

If we find that due to a customer's protected characteristic, following our standard policy or procedure would result in that customer being unreasonably disadvantaged, we will consider what reasonable adjustments we can make to our standard policy and procedure to eliminate any potential discrimination.

### **Reasonable Adjustments**

A Reasonable Adjustment is a legal term described in the Equality Act 2010 and means that if a customer is vulnerable, there may be a requirement for us to adjust our normal working practices, this involves making a change to the way that we would usually do things, for equity and fairness to all our customers.

We are committed to making our working practices and services meet the needs of all our customers, and particularly for those with disabilities, or those with temporary/short-term conditions who might otherwise be disadvantaged. These adjustments may include alterations to premises (see our **Aids and Adaptations Policy**), amendments to policies and procedures or provision of alternative means of communication methods to suit individual customer needs.

It is not possible to produce an exhaustive list of reasonable adjustments since an adjustment can only be determined as reasonable or not in relation to a specific set of circumstances. However, the Equality and Human Rights Commission recommends consideration of the following factors in determining what is 'reasonable':

- How effective the adjustment will be in avoiding the disadvantage the customer would otherwise experience
- The practicality of the adjustments
- The extent of any disruption the adjustments might cause
- The costs of making the adjustment, whether they are possible within our resources

### **3.5 Recording Customer Vulnerabilities (RECORD)**

Where a customer presents as vulnerable or needing support, we will discuss the available options. Our colleagues have a responsibility to record the information accurately.

We will capture specific customer attributes and consider whether we need to tailor our services, for easy access to our services. The customer's attributes will be reviewed and updated regularly.

We will discuss available support and services with the customer and where we assess a level of need requires external agency involvement, we will make the appropriate referrals with the customer's consent.

### **3.5 Quality Assurance and Monitoring**

MTVH understands the importance of reviewing the effectiveness of our support and the impact on our vulnerable customers.

We conduct regular assessments and data analysis to identify gaps, refine our strategies and adapt policies/processes in response to changing needs and emerging challenges.

## 4 Background legislation

This policy is intended for use by MTVH colleagues and is designed for assurance that we meet our legal and regulatory requirements, professional and industry codes of conduct and the ethical standards that we set ourselves as part of our values.

This policy is in accordance with:

- Equality Act 2010
- The Care Act 2014
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Public Sector Equality Duty
- Regulator of Social Housing and Consumer Standards
- The Housing Ombudsman Service’s Complaints Handling Code

## 5 Our commitment to Equality, Diversity, and Inclusion

In implementing this policy MTVH will not discriminate against any colleague, customer, or stakeholder on the grounds of their sex, sexual orientation, gender reassignment status, ethnic origin, age, religious belief, disability, marital status, and pregnancy/maternity.

An Equality Impact Assessment has been completed for this policy and is retained by the Policy Team.

## 6 Key Policy Information

Policy Owner	Director of Operational Risk
Author	Head of Strategy and Support
Approved by	Customer Services SLT
Effective from	December 2024
Approach to review	This Policy & associated Procedures will be reviewed as required by the owner for changes in legislation, regulation, and operational need. Any amendments will be appropriately consulted on and signed off before being clearly communicated to customers and colleagues. Next expected review is 5 years from the ‘Effective date’ of this document.
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