

SUPPORTING RESIDENTS AT RISK POLICY

Responsible Officer

Director of Customer Services

Aim of the Policy

The purpose of this policy is to ensure that Phoenix fulfils its statutory and contractual obligation when working with or responding to 'at risk' residents that are living amongst its housing stock.

The aims of the policy are to:

- Provide a clear definition of the individual circumstances that we will use to determine if a resident is 'at risk' or 'vulnerable' and to record related information accurately and securely.
- Have effective procedures in place for the identification of residents at risk and the provision of enhanced services (such as financial inclusion or tenancy support) that enable those residents to maintain their tenancy or lease and live independently.
- Raise employee and resident awareness of the external agencies that have either a statutory requirement or are otherwise able to deliver a service or support that meets the resident's needs but is not provided by Phoenix.
- Set out Phoenix's approach where a resident continuously refuses to grant access to their home to complete the necessary safety checks.

Policy Scope

This policy applies to residents of Phoenix Community Housing.

The Policy

Phoenix is committed to making a lasting difference to the day-to-day lives of our residents by supporting them to live independently, sustain their tenancy or lease and prevent them becoming socially excluded.

We recognise that many residents are vulnerable or "at risk" and may have support needs. The purpose of identifying potential vulnerability is to ensure that the services provided are wherever possible tailored to meet the needs of the individual.

For the purpose of this policy we will define an 'at risk' or 'vulnerable' resident as:

An individual or household that needs enhanced services or additional support to enable them to live independently, sustain their tenancy or lease and/or to prevent social exclusion.

Where Phoenix does not directly provide a service, we will sign-post or refer vulnerable residents to appropriate agencies that offer the relevant service, such as mental health or social services.

In cases where we sign-post or refer a resident, we are unable to provide assurance that the agency will be able to deliver services to them.

Vulnerability is not necessarily a permanent position and can vary according to an individual's circumstances. People will have different needs at different times and each resident's experiences will be different, so requires a range of flexible responses.

The provision of enhanced services and support may be provided long term to enable anyone with particular needs to maintain their tenancy. However, it may also be time limited in order to enable an individual to alter their lifestyle and gain the skills, motivation and confidence to move on to greater independence.

Recognising and Identifying 'At Risk' Residents

Whilst it is not possible to outline every circumstance that could indicate that a resident is 'at risk' or vulnerable, nor will an indicator of potential vulnerability mean that a resident needs an enhanced service or additional support, it is necessary to have a consistent approach for recognising potentially vulnerable residents.

We use the following criteria to indicate residents that may need an enhanced service or additional support to enable them to live independently, sustain their tenancy and/or to prevent social exclusion.

A resident must fulfil one criterion in at least two of the categories (status, functional ability and support networks) to be defined as potentially vulnerable.

Status	Functional Ability	Support Networks
<ul style="list-style-type: none"> • Mental health needs • Learning difficulties • Person aged 65+ • Tenant under 18 • Tenant over 18 but under 25 • Children aged 9 or under in the household • First year of tenancy • Alcohol or substance misuse • History of street homelessness • Threatened by domestic violence, harassment or abuse • Refugee or asylum seeker • Ex-offender • Leaving care 	<ul style="list-style-type: none"> • Self neglect • Unable to perform self care tasks • Difficulty with significant daily tasks • Significant problems with finances or budgeting • No previous or recent experience of successfully managing independent housing • Chaotic lifestyle • Severely impaired mobility and/or risk of falls 	<ul style="list-style-type: none"> • Lives alone • Partner or carers unable to provide support with current problems • Involvement with Social Services • Self isolating • No or inadequate support networks or advice • Lives in an overcrowded property

Status	Functional Ability	Support Networks
<ul style="list-style-type: none"> • Young lone parent • Pregnant women (particularly teenagers) • Severe physical health problems, debilitating illness or disability • Recently bereaved • Hoarder • Ex military servicemen/women 	<ul style="list-style-type: none"> • Sensory impairment • Language or literacy difficulties • Physical frailty • Difficulties with child care responsibilities 	

We will not assume that residents who fulfil any of the above criteria need an enhanced service or additional support. We understand that each person will have different requirements so at key points of contact (e.g. sign up) we will complete a vulnerability assessment to define the specific support or service adjustments that may be required, including asking whether they could leave their home without assistance in the event of a fire in their home.

Where the vulnerability assessment identifies a resident as potentially vulnerable a person alert will be recorded on their tenancy file that will be used to notify employees of the resident's requirements. In some circumstances a User Defined Code (UDC) may be placed on our housing management database.

Contractor and Agent Appointments

A copy of this policy will be sent to all contractors/agents currently working for Phoenix and all new potential contractors/agents as part of the tendering process.

Confidentiality

All personal information, including that relating to aspects of vulnerability, will be handled in accordance with data protection and privacy legislation and Phoenix's Data Protection Policy.

Sensitive information relating to individuals, including vulnerability details, will be recorded on the person's tenancy file. This information will be stored securely on Phoenix's databases which will only be accessible to employees, and where appropriate contractors/agents on a need to know basis and as set out in Phoenix's privacy statement.

Employees will only make referrals and share information with other agencies with the consent of the resident concerned. Exceptions to this are where either information is necessary for the protection of children or vulnerable adults (as defined by the Mental Capacity Act 2019), and where we are required to share the information by law e.g. in response to a police request relating to a criminal investigation, or where an individual may harm themselves or others.

Where we publish reports relating to vulnerable residents data will be anonymous and individuals unidentifiable.

Safeguarding

In circumstances where concerns are raised about a vulnerable resident who is experiencing abuse or self neglect, a referral will be made to the Safeguarding Panel and a safeguarding concern will be raised with the local authority if required.

Hazelhurst Court Extra Care Scheme

This scheme is designed for residents who are over 55 with various support needs some of which are met by a care provider. Additional policies and procedures exist for this scheme.

Hoarding

When we identify a concern a referral is made to the Tenancy Support Advisor who will work with the household to minimise the impact of the hoarding on their enjoyment of their home, their safety and the safety and condition of their home.

Risk Assessments

Risk Assessments are our key tool to help us work safely with vulnerable/‘at risk’ residents. They are also used to assess cases where referrals need to be made to outside agencies and or our internal safeguarding panel.

The risk assessment will also identify and set out cases to be referred to the Head of Health, Safety and Compliance for consideration.

Where there are safety issues to be considered we take a cross team approach.

Monitoring cases

We will hold regular cross business meetings to actively monitor existing cases and highlight new cases when they arise.

Personal Emergency Evacuation Plans (PEEPs)

We ask residents if they are able to leave their home and get to a place of safety in the case of a fire. If they cannot, we will work on and develop a Personal Emergency Evacuation Plan (PEEP), initially prioritising residents living in our higher risk properties (an example of a higher risk property is one with a higher number of storeys).

Landlord Safety Requirements

Where access to a property cannot be gained to meet our statutory obligations as a landlord we will pursue legal action. However if a resident or officer considers an exemption should be made due to an individual’s personal circumstances, a risk assessment will be carried out. This will be considered by the Head of Health, Safety and Compliance and where they recommend a temporary exemption is needed based on the risk assessment, the case will be referred to the Director of Property and New Business for approval. Such exemptions will be kept under regular review at monitoring meetings until access is achieved.

Where a medical condition, vulnerability or hoarding is identified that is preventing Phoenix from completing safety checks or maintaining the property as required by relevant law, good practice guidance or our policies the risk assessment will be used to assess what actions Phoenix should be taking to gain access including whether legal action should be pursued so we can do works or inspections or not or legal advice be taken. This assessment will be approved by the Director of Property and New Business.

Monitoring and review

All employees are responsible for complying with this policy and ensuring that consideration is given to vulnerable residents in the day-to-day delivery of their role.

Specific responsibilities relating to vulnerable residents are outlined in individual role profiles and explained in the procedures connected to this policy.

Employees will receive mandatory diversity and inclusion and safeguarding training as well as specific training relating to the requirements of vulnerable residents in relation to their role.

Regular compliance checks will be undertaken to ensure services are delivered in line with this policy.

The Supporting Residents At Risk Policy and connected procedures will be reviewed by employees and residents every three years or in response to future regulatory changes. The review will ensure that a comprehensive service is being offered that meets residents' needs and expectations.

Implementation Guidelines

This policy will be implemented by:

- Seeking agreement at the Customer Services Management Group and Customer Services Director and the Board.
- Training with key staff
- Integrating into relevant staff supervision and monitoring sessions
- Updating the Phoenix Website

Legislation

Equality Act 2010 - provides a framework that protects individuals from discrimination and promotes equality of access.

Care Act 2014 - helps to improve people's independence and well being by making clear that local authorities must provide or arrange services that help prevent people developing needs for care and support or delay people deteriorating such that they could need ongoing care and support.

General Data Protection Regulations 2018 - gives individuals protection from the misuse of personal information held about them on computer and manual records and makes the improper obtaining or disclosing of personal information a criminal offence.

Mental Capacity Act 2019 - protects vulnerable people that are not able to make their own decisions. It asserts who can take decisions, in what circumstances, and how these decisions should be made.

Coronavirus Act 2020 - Section 15 and schedule 12 of the Act makes extensive changes to Local Authority (the 'LA') powers and duties under the Care Act 2014, in particular to how they conduct

care and financial assessments and to allow for changes in the way a LA prioritises care to children and adults in each area.

Reference to other documents and associated policies and procedures

Including:

- Complaints Policy
- Data Protection Policy
- Privacy Statement
- Equality and Diversity Charter
- Managing Unacceptable Behaviour Policy
- Phoenix Tenancy agreements
- Phoenix Standards
- Reasonable Adjustments Policy & Exercise of Discretion Guidance
- The Regulator for Social Housing Regulatory Standards

Definitions

Term/acronym	Description
Resident	Includes tenants and leaseholders
Phoenix	Phoenix Community Housing
LBL	London Borough of Lewisham
HO	Housing Officer
HM	Housing Manager
GDPR	General Data Protection Regulation
Enhanced Services	Specialist services such as tenancy support or financial inclusion.
UDC	User Defined Code

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