

SERVICES FOR VULNERABLE PEOPLE POLICY

Board Approval:	March 2024	Responsible Board:	Ocean Housing Ltd
Next Review:	March 2027	Responsible Executive:	Managing Director of Ocean Housing Ltd

1.0 Policy Statement

- 1.1 Ocean is a provider of social housing in Cornwall. Our mission is *‘to be an innovative provider of quality homes and services, with residents and staff at the heart of Ocean, and Ocean at the heart of the community.’*
- 1.2 This policy sets out Ocean’s responsibilities and approach when dealing with vulnerable people. The policy underpins the following corporate objectives:
- Have residents at the heart of everything we do.
 - Provide good quality services, right first time.
- 1.3 This policy may need to be read in conjunction with other Ocean policies including:
- Reasonable Adjustment Policy
 - Safeguarding adults
 - Safeguarding children
 - Allocations and Lettings
 - Anti-Social Behaviour
 - Domestic Abuse
 - Harassment Incidents, Crime & Racial Harassment
 - Income Recovery
 - Equality Diversity & Inclusion Strategy & Policy
 - Code of Conduct (Staff)

2.0 Background

- 2.1 Most of the homes we provide are general needs, i.e. intended for occupation by residents who do not have any support need, or if they do, those needs are met by an external provider.
- 2.2 Ocean Extra is a subscription-based service providing a visiting and / or lifeline service to Ocean tenants and other customers.
- 2.3 We provide responsive repairs and planned maintenance services for tenants, working towards our key corporate objectives. The workforce receives regular training and support in recognising and responding to the needs of vulnerable tenants, ensuring that the service is tailored as appropriate to meet individual needs.
- 2.4 Ocean does not have a statutory responsibility for providing support or care services. This statutory responsibility falls to Cornwall Council’s Adult Social Care, Cornwall Partnership NHS Trust, Cornwall Council Adult Safeguarding team and Cornwall and Isle of Scilly Safeguarding Children’s Partnership. Ocean works in partnership with these and other agencies.

2.5 Ocean recognises that our tenants may be vulnerable for a range of reasons. This policy sets out our service offer to vulnerable people.

3.0 Scope

3.1 This policy is intended to cover all Ocean customers including tenants, shared owners, leaseholders, prospective tenants, and Ocean Extra customers.

3.2 We recognise that a significant number of existing and prospective tenants and other customers are considered 'vulnerable'. This policy aims to support the local authority to meet its obligation under the Care Act 2014. The Act requires social landlords to focus on the principles of prevention, early intervention, and accountability in relation to the protection of vulnerable adults in their care.

3.3 Ocean has defined the term vulnerable may include tenants and other customers with one or more of the following issues (this list is not exhaustive):

- - People with a learning disability
 - People with a mental health or neurodiversity needs
 - People with a physical or sensory impairment
 - People with a substance misuse issue
 - People with gender dysphoria
 - People affected by domestic abuse
 - People affected by significant anti-social behaviour, harassment or hate crime.
 - People from marginalised groups, or different backgrounds
 - Children as a result of neglect, or abuse
 - Care leavers
 - People in receipt of support or services from an external agency such as probation, social services, etc.
 - Young tenants (under the age of 25)
 - Former rough sleepers

3.4 Ocean further recognises that not all people in these categories will be vulnerable. We will evaluate each case on its merits before applying this policy.

4.0 The Policy

4.1 We recognise that a number of tenants and other customers are vulnerable and whilst some may have their support needs met by an external provider, some do not. Ocean is keen to help vulnerable people to access the necessary support to help them to live independently and maintain their Ocean tenancy. A great deal of emphasis is placed upon working with the vulnerable person, their support agency and if appropriate their family and friends to help them achieve a suitable level of support. Ocean does not itself provide support services.

4.2 Ocean aims to have a good relationship with tenants who hold a tenancy with us or other customers who use our services and there are many opportunities for staff to identify a tenant and other customers who may be vulnerable.

4.3 We ensure that relevant frontline staff receive training on how to identify and work with vulnerable tenants and other customers, as necessary.

4.4 Pre-tenancy

- 4.4.1 Prospective tenants who seek housing with Ocean normally apply via Cornwall Homechoice, and every customer goes through a verification and risk assessment process to evaluate their housing requirements and identify any support needs. Any agency working with the prospective tenant will be contacted to seek their support / advice in dealing with the housing request. Where a vulnerable prospective tenant does not have the benefit of a support service, we will signpost them to a suitable service if appropriate. We are committed to helping prospective tenants access the necessary support to enable them to move in and sustain their tenancy.
- 4.4.2 Occasionally prospective tenants may have a significant unmet support need, but there is no suitable support service available. In such cases we will not house them as the tenancy will not be sustainable. We do not set people up to fail.
- 4.4.3 We will carry out a financial assessment for each prospective tenant and where a prospective tenant is considered vulnerable assistance will be offered to help them claim welfare benefits, if required.

4.5 Services for tenants

- 4.5.1 Ocean's Neighbourhood Services Team are responsible for monitoring and managing tenancies. They are not responsible for providing support but will often act as the 'broker' or link between a vulnerable tenant and the relevant support agency. We employ a Tenancy Sustainment Co-ordinator who takes the lead on working with vulnerable tenants to help them access the support required to enable them to sustain their tenancy.
- 4.5.2 Ocean staff are encouraged to be pro-active in identifying any concerns about a tenant and other customers and alerting other agencies as necessary. We may provide one of a range of services over and above our normal service standard to vulnerable tenants and other customers including:
- More frequent visits to the property, Signposting to an appropriate support service or statutory agency
 - Acting as a co-ordinator arranging multi agency meetings in complex cases
 - Safeguarding alerts for adults and children
 - Being aware of the potential for abuse and acting to mitigate it.
 - Working with tenants to better manage the tenancy by setting targets and carrying out regular monitoring and checks
 - Support to claim welfare benefits
 - Information sharing with other agencies subject to data protection
 - Dealing with health and safety issues (hoarding, DIY etc.)
 - Arranging mediation between neighbours as appropriate
 - Referrals to Cornwall Council for aids and adaptations to the property
 - Referrals to the Cornwall Sanctuary scheme for practical help in cases of domestic abuse
 - Attendance at partnership meetings including 'Child in Need, Safeguarding, 'Safer Communities Meetings', 'MARAC (multi agency risk assessment committee)', 'MAPPA (multi agency public protection agency)', case conferences and child protection meetings.

4.5.3 We recognise the importance of working in partnership with other agencies so that a comprehensive approach is taken when working with vulnerable tenants and other customers. Some of our major partnerships includes:

- Cornwall Council
- Devon & Cornwall Police
- Cornwall Fire & Rescue service
- Cornwall Partnership Foundation Trust, including CAHMS (Child and Adolescent Mental Health Service)
- Drug / alcohol agencies
- Domestic abuse and sexual violence support services
- Health visitors, occupational therapists, care workers
- Probation Service
- Cornwall Youth Offending Services
- Mediation services
- Shelter
- Voluntary agencies
- Early Help Hub
- Harbour Housing

4.5.4 We are keen to work with vulnerable tenants and any relevant agency that can offer assistance. On occasion it can be difficult to engage agencies who need to be involved and when this occurs, we will try to act as a 'broker' or link between the vulnerable tenant and the agency.

4.5.5 There are occasions when a vulnerable tenant is not prepared to engage, either with their support agency or Ocean. In cases like this reasonable efforts will be made to reach the vulnerable tenant with a view to working with them. However, if they refuse to engage and this results in a breach of tenancy, Ocean will consider tenancy action.

4.6 **Repairs and Maintenance Service**

4.6.1 Responsive repair and planned maintenance services are provided to tenants by our Property Services team. The workforce has the most contact with Ocean tenants, carrying out more than 20,000 jobs per year. Whilst every effort is made to record details of vulnerable tenants, there will be households in Ocean properties who have unmet needs and issues that we may be unaware of. The workforce is given guidance on how to identify anything that may give 'cause for concern' when visiting tenants. For example, an older person who appears confused, or a property that might be in a very poor and/ or cluttered condition. The workforce is encouraged to report anything that gives cause for concern to the Neighbourhood Services team (so the issues can be explored, and if appropriate advice given and action taken).

4.6.2 In cases where we have identified that a tenant is vulnerable this information will be included as a warning on QL and this may affect the way services need to be delivered to them. When a works order is placed or other services are delivered, action can be taken to tailor the service offered in accordance with the tenant's individual needs where reasonable and practicable, e.g. arranging to visit with a support worker, or allowing more time for the appointment if the tenant is infirm and needs time to answer the front door etc.

4.7 Safeguarding

- 4.7.1 Everybody has the right to be safe no matter who they are or what their circumstances. Safeguarding is about protecting children, young people and vulnerable adults from abuse or neglect. We are all responsible for this and we must ensure that we are doing all we can to protect the most vulnerable members of our society.
- 4.7.2 Although not statutorily responsible for child protection, Ocean takes its responsibilities seriously, as a landlord, service provider and employer, in safeguarding the independence, safety and wellbeing of all its tenants, their families and other service users.
- 4.7.3 Ocean is committed to ensuring that the nature of abuse and vulnerability is understood throughout the organisation, by staff, tenants, and service users. Training for staff is provided in respect of safeguarding and work with other agencies to ensure appropriate support to safeguard vulnerable adults and children experiencing abuse or in potentially abusive situations.

4.8 Ocean Extra

- 4.8.1 The Ocean Extra service aims to provide a reliable, flexible, and affordable service that:
- Enables individuals to live independently
 - Helps to maintain and improve an individual's health, wellbeing, and quality of life
- 4.8.2 The visiting and lifeline services are available on a subscription basis and customer numbers are limited.

4.9 Financial Inclusion

- 4.9.1 Ocean has a team of Financial Inclusion Advisors who support tenants to claim welfare benefits, in particular Universal Credit. Where a tenant is known to be vulnerable the advisor will offer support to help them manage Universal Credit.

5.0 Risk Assessment

- 5.1 Risk Assessments are carried out as required, and a plan is put into place to mitigate identified risk where it is necessary to do so.. Risk Assessments are always carried out when someone is being considered for a tenancy and at any point when the need to risk assess the customer becomes apparent

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- 5.2 Ocean has information sharing protocols with other agencies including the police and health department so that key information can be shared between agencies, subject to Data Protection. Any vulnerable tenant or other customer who presents as a risk will be provided with the same level of service, but it will be tailored to mitigate the risk, e.g. visiting in pairs if someone presents challenging behaviour etc.

6.0 Equality, Diversity & Inclusion

- 6.1 Ocean collects data to understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and also to assess whether all tenants have fair access to, and equitable outcomes of, housing and landlord services.

- 6.2 Ocean recognises that often vulnerable people may be disadvantaged socially, isolated and/or financially excluded. Where appropriate we will offer services in line with this policy to assist vulnerable tenants to sustain and maintain their tenancy.
- 6.3 Everyone has a right to be treated with dignity, fairness, and respect. This Policy is in line Ocean's Equality, Diversity, and Inclusion Strategy.
- 6.4 This Policy does not unfairly or unlawfully discriminate and will be applied equally for all Protected Characteristics. Reasonable Adjustments, under the Equality Act 2010, will be considered on a case-by-case basis.
- 6.5 We are committed to addressing any communication or language barriers by providing translation services for face-to-face contact and written communication when needed. We will also produce information in alternative formats such as audio or large print where required.
- 6.6 Staff are made aware of our approach to Customer Care and Equality, Diversity, and Inclusion.

7.0 Accountability

- 7.1 Delivery of this policy rests with the Head of Neighbourhood Services, reporting to the Managing Director of Ocean Housing.

8.0 Communication

- 8.1 This policy will be communicated to staff via a range of mechanisms. Training is provided on a regular basis to equip relevant staff on how to recognise vulnerable tenants and other customers and to develop the skills and knowledge needed to work with them. This policy has been approved by Ocean's tenant panel and is available on the Ocean website.

9.0 Monitoring

- 9.1 The work with vulnerable tenants and other customers is captured and monitored in several ways. Information is provided to Cornwall Homechoice on a regular basis on applicants that have been housed or rejected or who refused accommodation. This includes vulnerable tenants.
- 9.2 Ocean keeps records of all vulnerable tenants and other customers that we are currently working with, which includes details of other agency involvement, and whether safeguarding is required. We record the risk level of each case where a medium or high risk has been identified.
- 9.3 Vulnerable tenants and other customers are monitored on QL. Cases are reviewed between staff and Managers as required.