

Vulnerable Adults' Housing Policy

March 2022

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1. AIM OF THE POLICY

- 1.1. Dartford Borough Council ('the Council') owns and manages 3,778 general needs properties and 454 housing scheme properties for older people. As well as being a social housing landlord, the Council provides housing advice and assistance to residents and has a duty to prevent homelessness in the Borough. In addition, the Council seeks to improve the quality and suitability of homes in the private sector, from owner occupied homes and caravans to privately rented flats and houses in multiple occupancy.
- 1.2. The Council aims to ensure that everyone has the opportunity to access and benefit from its services, but realises that for some service users who are vulnerable, barriers may exist which may prevent participation.
- 1.3. The objectives of this Policy are to set out:
 - How vulnerable adults are identified
 - How vulnerable adults can access the Housing Service
 - How the Housing Service has adapted to meet the needs of vulnerable adults
 - The safeguards which are in place to protect vulnerable adults
 - How Housing Services staff will signpost and refer vulnerable adults to other organisations, when they require additional support.
- 1.4. This Vulnerable Adults' Housing Policy links with the Council's [Homelessness and Rough Sleeper Strategy](#), [Private Sector Renewal Strategy](#), [Rent Arrears Policy](#) and [Anti-social Behaviour Policy](#). It also links to the Council's [Safeguarding Policy](#), [Equality & Diversity Document Framework](#), and the Council's [Corporate Plan](#) aim 'to facilitate quality, choice and diversity in the housing market, assist in meeting housing need in Dartford and deliver high quality services to service users'.

2. VULNERABLE ADULT DEFINITION

- 2.1. For the purpose of this Policy, a vulnerable adult is defined as:

<p><i>Anyone aged 18 or above or aged 16/17 with a guarantor; who may be in need of community care services or an enhanced housing service</i></p>

- 2.2. It should be noted that due to the separation of functions, individual teams within the Housing Service may use other definitions of vulnerability such as statutory definitions. For example, homelessness legislation has a definition of vulnerability which is used to determine whether or not a local authority is required to secure alternative accommodation for a vulnerable person who is in priority need.
- 2.3. This Policy is not bound by legislation and because of this a general definition of 'vulnerability' has been adopted which will be used broadly across all service areas, for the purpose of identifying service users who may require a tailored or enhanced housing service (such as extra visits or correspondence in braille) or who require signposting to other services. The definition does not replace statutory definitions.

- 2.4. The Council recognises that someone can be vulnerable for a number of reasons, these may include:
- Mental health problems
 - Learning disability or difficulty
 - Sensory impairment
 - Physical disability or illness
 - They are frail and elderly
 - They have alcohol or substance misuse problems
 - They are an ex-offender
 - They are experiencing domestic abuse or harassment
 - They have left care
 - English is not spoken, or spoken only as a second language
 - They lack capacity to make decisions for themselves (under the Mental Capacity Act 2005)
- 2.5. A person may be vulnerable as a result of a single problem or condition, or due to a combination of factors. Vulnerability can also occur at different points in a person's life, for instance someone may need support following bereavement for a temporary period, whereas another may require support permanently.
- 2.6. This Policy does not assume that whole groups of people are vulnerable. For example, it is not correct to assume that all older people are vulnerable or that all disabled people are vulnerable.
- 2.7. There are a number of signs that someone may be vulnerable. These may include, but are not limited to the following:
- Concerns about an adult whose care and support needs are not to being met
 - Falling into rent arrears or other debt problems
 - Issues with maintaining the tenancy
 - Being the victim, or perpetrator, of anti-social behaviour, hate crime or harassment
 - Disputes with neighbours
 - Damage to the person's home
 - A detrimental change to a person's physical appearance
 - A failure to respond to correspondence or to answer the door when visited
 - Self-neglect, hoarding or other behaviour which results in the person's home and/or garden becoming damaged, neglected or otherwise unfit for occupation
- 2.8. **Children with support needs** – the Council's [Safeguarding Policy](#) covers where intervention may be needed regarding children with support needs, and explains the various support levels and types of intervention services available.

3. HOW VULNERABLE ADULTS ARE IDENTIFIED

3.1. When a service user contacts the Housing Service there is an opportunity to identify whether they are vulnerable. Because someone can become vulnerable at different stages of their lives, it is essential that identification of vulnerability is not just at the point of first contact, but is picked up whenever contact is made.

3.2. Vulnerability can be identified by Officers in a number of ways:

- Various application forms that include a vulnerability checklist, for example, the Council's housing register, homelessness prevention form, disabled facility grants and private sector leasing scheme
- During the initial tenancy sign-up or during other home visits
- Over the phone
- Notification from relatives, neighbours or friends
- During daily calls or weekly visits for Housing Scheme tenants
- Housing support concern card. If a repairs or gas servicing contractor has concerns that someone may require some extra support or there are safeguarding concerns, they complete a 'concern card' and then return it to the Housing Officer. The Housing Officer then contacts the tenant to resolve any unmet need
- Notifications from professionals, such as Occupational Therapists, Care Managers or GPs

3.3. What happens when a service user is identified as vulnerable

3.3.1. When a service user is identified as vulnerable (according to the Housing Services definition) by a member of staff, that member of staff will seek to support the service user in a number of ways, which are highlighted in Section 4 of this Policy.

3.3.2. The member of staff will also record the nature of the vulnerability and how the service user has been assisted e.g. 'referral for Adult Social Care' and any other agencies working with the service user. The purpose of recording this information is to ensure that when any future contact with the service user is made, there is a record of the level and type of vulnerability to enable the member of staff to act accordingly. Staff may also liaise with agencies who are working with the service user to resolve any housing issues.

3.3.3. If a service user is identified as vulnerable by someone other than a member of staff, for example a relative, then a Housing Officer, a Housing Solutions Officer, or a Housing Scheme Officer will carry out a Housing Check-up (which may be a phone conversation or a visit), where they will investigate the service users support needs and, if appropriate, refer them to the relevant organisations. The service user's privacy will be respected and the person is under no obligation to discuss their needs or to disclose matters such as mental health problems or alcohol dependency. If the service user does not wish to discuss or confirm their vulnerability, the Officer will make a note on the system that contact has taken place and the service user has confirmed that they do not need additional support. However, the service user will be made aware that they can contact the Housing Service at any time in the future should they require help.

3.3.4. Regular reviews will be completed to ensure the information held regarding a person's vulnerability is up to date and accurate.

4. HOW VULNERABLE ADULTS ARE SUPPORTED

4.1. General signposting and referrals

4.1.1. When a member of staff identifies a vulnerable adult they will seek to signpost or refer the person to appropriate support if it is needed. Some of the services signposted or referred to may include for example:

- GPs and other health services
- Mental health services
- Adult Social Services (for care and support services or safeguarding)
- Housing-related support (available to Housing Scheme tenants)
- Occupational Health
- Substance misuse services
- Domestic abuse services
- Debt advice and welfare benefit services
- Advocacy services

4.1.2. It is also recognised that carers, who are caring for vulnerable people in a voluntary capacity (e.g. partner, relative or friend), may also need support in fulfilling their responsibilities and in looking after their own wellbeing. Carer's will be signposted, wherever appropriate, for carer's assessments and/or to other carer's support.

4.2. Communication

4.2.1. The Housing Service communicates with its service users in a variety of different ways:

- Face to face, which includes: home visits and appointments at the Civic Centre
- Phone
- Letters
- Through the Link (tenants newsletter)
- Email
- Texts

4.2.2. In accordance with the Council's [Equality and Diversity Document Framework](#), documents are available in other languages, braille, large print and audio tape and all staff will provide assistance to complete forms when requested. Service users can also ask that correspondence is sent to someone who will act on their behalf. Telephone and face-to-face language interpreting and British Sign Language interpreting services can also be provided upon request. Calls can be received via Relay UK.

4.2.3. Service users are asked to convey any communication needs when they first approach the Housing Service (questions are posed in the vulnerability checklist) but also at other opportunities during their tenancy. This ensures that the Housing Service can communicate with the service user in the best way possible and in a way that is tailored to their individual needs.

4.3. **Mental capacity**

4.3.1. The Mental Capacity Act 2005 (the Act) provides the legal framework for acting and making decisions on behalf of people (aged 16 or over) who lack the mental capacity to make particular decisions for themselves.

4.3.2. Where it is identified that a service user does not have the mental capacity to make decisions for themselves, the Housing Service will work with carers, advocates and legal representatives of the service users to ensure they are able to access the services they need in line with the Act.

4.4. **Safeguarding vulnerable adults from abuse and neglect**

4.4.1. Safeguarding duties apply to adults who:

- Have needs for care and support (whether or not they are receiving any services); and
- Are experiencing, or at risk of, abuse or neglect; and
- As a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse or neglect

4.4.2. If a safeguarding concern is identified by a member of staff, they will follow the Council's [Safeguarding Policy](#) to make a referral to Adult Social Services, or the Police in an emergency, to protect the adult from harm¹.

4.5. **Suicide risk**

4.5.1. If there are concerns that a service user is experiencing suicidal feelings or is at risk of self harm, the internal Suicide Awareness Guidance (located on the Intranet) will be followed for advice on the risk factors and signs that someone may be having difficulties; how to assess the level of risk; and the help available to reduce the risk.

4.6. **Addressing loneliness**

4.6.1. Loneliness is defined as “a subjective, unwelcome feeling of lack or loss of companionship. It happens when we have a mismatch between the quantity and quality of social relationships that we have, and those that we want”.²

4.6.2. Adults have been the focus of most of the research around loneliness, although loneliness can affect anyone of any age and background. Loneliness does not discriminate and it is recognised that you do not have to be vulnerable to experience loneliness – although it is acknowledged a person's vulnerability may increase the risk for some.

4.6.3. The Housing Service has carried out a review of how it can help to tackle loneliness, and in doing so, staff will be aware of the issues of loneliness; how to identify someone is experiencing loneliness; and where to signpost the person for support.

¹ The Safeguarding Policy also covers the procedures to protect children from abuse and neglect

² A Connected Society: A Strategy for Tackling Loneliness, HM Government, 2018, page 18

4.7. Available services and safeguards for vulnerable adults

Housing Solutions
What they do?
<p>The Housing Solutions Team are responsible for administering the Council's housing register and providing assistance to service users in finding a home using Kent Homechoice, the Kent-wide choice based lettings system. The team work closely with specialist housing providers in the Borough, to nominate people with disabilities/difficulties or mental health issues to Housing Scheme or extra care accommodation. In addition, a representative from the team attends regular meetings with Health and Social Services to find housing placements for people who have specialist needs. The team also provide general housing information, advice and assistance to anyone in order to prevent homelessness.</p>
How do they assist vulnerable adults?
<ul style="list-style-type: none">• Service users can nominate an advocate to bid for properties on their behalf or request that a member of the Housing Solutions Team bids for them.• Each year the team reviews the bidding history of vulnerable service users in order to offer support or advice if it is needed.• Home visits are available for those who are vulnerable and unable to attend the Council's offices.• Interviews operate a trigger system so that when issues are identified e.g. drug/alcohol abuse, mental health issues etc., the Housing Solutions Officer can signpost the service user to appropriate support services.• The Council has ensured that one unit of emergency temporary accommodation is suitable for a person with a physical disability.• There are a range of housing options for victims of domestic abuse. This includes refuge or temporary accommodation, Sanctuary Scheme measures and management transfers. An anonymous PO Box is also available, if victims wish to keep their address confidential.• The Housing Inclusion Service takes a holistic and practical approach to resolving problems and preventing homelessness by improving outcomes in a range of areas, including: housing options, managing money, claiming benefits, debt including rent arrears, registering with a GP or getting help from other services, accessing education, training or work opportunities. This service also co-ordinates the Housing Hub that accesses various partner agencies that help to sustain tenancies and to prevent and relieve homelessness.• Referrals will be made to the Complex Case Panel, which is a joint panel between the Housing Solutions and Housing Management Teams that work together to put in place plans for Council tenants with complex needs who may be at risk of homelessness.• The Council has signed up to a range of Kent-wide partnership protocols, which seek to prevent key vulnerable groups from becoming homeless.• The team investigate cases in the private sector of alleged harassment and illegal eviction.

Housing Schemes

What do they do?

The Housing Service has 11 housing schemes for older people and provides for a broad section of community needs including people who have housing issues and may require additional assistance with daily living tasks. Each resident has their own flat, with kitchen and bathroom facilities. There are also communal lounges, guest rooms, laundries and gardens at these schemes. The schemes are managed by a team of mobile Housing Scheme Officers.

How do they assist vulnerable adults?

- Housing Scheme Officers are available to provide an enhanced housing management service to tenants, this includes:
 - The provision of an emergency alarm system with 24 hour monitoring
 - Help in maintaining independence
 - Monitoring wellbeing
 - Contacting the GP or emergency services
 - Gaining access to other services, such as, hands on care from Social Services or requesting aids and adaptations to make life easier and safer
 - Guidance on personal safety and security
 - Advice on benefit claims
 - Advice on getting repairs done
 - Pursuing rent arrears
 - Help with paying rent or utility bills
 - Resolve low level anti-social behaviour issues
- All tenants who want to can have personal contact with a Housing Scheme Officer at least once a week as well as a daily call. Residents can also request additional contact with their Housing Scheme Officer for any ad-hoc assistance or advice.

Housing Management

What do they do?

The Housing Management Team manage the Council's general needs rented accommodation. The team pursue rent arrears, sign up new tenants, resolve anti-social behaviour and ensure that neighbourhoods are safe and socially inclusive spaces. The team also manage the Council's owned Gypsy and Traveller site and the Council's garage stock.

How do they assist vulnerable adults?

All new tenants are contacted six weeks after their tenancy has commenced, giving opportunities to resolve any difficulties or signpost to additional services. Tenants are also asked if they would like to continue with follow-up contact.

Anti-social behaviour (ASB) and other breaches of tenancy conditions

- The Council recognises that vulnerable people may not only be the victims but also the perpetrators of ASB and that early intervention is a priority.
- Housing representatives will work in partnership with a range of different organisations (such as the Police, Social Services, Education, and the Council's Community Safety Unit) to resolve a tenant's problems.

Housing Management

- If a tenant is at risk of violence, the Housing Service may enhance the security of property locks, doors, windows etc. through the Sanctuary Scheme, arrange management transfers and provide further support and reassurance including additional contact via visits and telephone calls.
- Housing Officers will always consider alternative methods to resolve ASB such as anti-social behaviour agreements and referral to support agencies, only taking court action to end a tenancy as a last resort.
- If a family is experiencing problems and if at least one child is engaged with the youth offending team, then the Housing Officer will refer them to a Family Intervention Worker who will engage the whole family and seek to promote their physical, social and emotional wellbeing, while addressing any ASB problems.

Rent arrears

- Where a vulnerable tenant is in rent arrears, extra visits by the Housing Officer may be organised.
- The Council can apply for Alternative Payment Arrangements for vulnerable tenants who cannot manage their single monthly payment when they are claiming Universal Credit.
- The requirements for early intervention in the Pre Action Protocol for Possession Claims by Social Landlords will be followed and action taken to resolve rent arrears before commencing with possession proceedings.
- Referrals will be made to the Housing Inclusion Service and Housing Hub to look at ways to help maximise income.
- The Housing Officer will seek to signpost and refer tenants who have ongoing issues with financial management to other organisations, such as Citizens Advice and debt advice agencies, who are able to give advice and guidance regarding budgeting and applying for benefits.

Legal action

- Every attempt will be made to avoid legal action in the first place.
- Referrals will be made to the Complex Case Panel, which is a joint panel between the Housing Solutions and Housing Management Teams that works together to put in place plans for Council tenants with complex needs who may be at risk of homelessness.
- If court action is taken against a tenant who is vulnerable because of ASB or a breach in tenancy conditions other than for rent arrears a Disability Discrimination Assessment will be carried out prior to the hearing to ensure that the Housing Service is not acting in a discriminatory way.
- Under the Pre Action Protocol for Possession Claims by Social Landlords, if the Council is aware that a tenant is particularly vulnerable, it will consider at an early stage:
 - Whether or not the tenant has the mental capacity to defend possession proceedings and the extent to which Part 21 of the Civil Procedure Rules applies (children and protected parties)
 - Whether or not any issues arise under the Equality Act 2010
 - Whether or not there is a need for a community care assessment in accordance with the Care Act 2014

Housing Repairs and Maintenance

What do they do?

The Housing Repairs and Maintenance Team repair and renew council properties. The team also install disabled adaptations in council properties following a request from the Dartford Occupational Therapist.

How do they assist vulnerable adults?

- The Council aims to prioritise non-emergency repairs for elderly and vulnerable tenants wherever possible (for example heating and hot water) where the nature of the repair could risk the health or wellbeing of that person or household.
- The team work with an Occupational Therapist to make a home suitable for a disabled tenant through the installation of suitable adaptations.
- A free Handyman scheme is available to carry out small DIY tasks for tenants who are 65 or disabled, or who live in a Council housing scheme.
- An Older Person's Decoration Scheme is offered to households where all members of the household are 65 years or older, or if a person is physically disabled and living independently. The Council will provide the labour for one room to be decorated every 5 years. All materials must be provided by the tenant.
- Tenants can request a tradeswoman to carry out a repair or a female chaperone to attend when maintenance repair works are carried out.
- When carrying out major works, the contractor's Resident Liaison Officer will meet with the tenant, taking into account their needs and will provide a bespoke service which may include moving furniture, emptying cupboards etc.
- A respite room is available for tenants in the contractor's offices, while work is being undertaken on their property.
- If a repairs of gas servicing contractor has concerns that a tenant may require extra support or there are safeguarding concerns, they fill out a 'concern card' and return it to the Housing Officer. The Housing Officer then contacts the tenant to resolve any unmet need.
- When carrying out estate inspections, a range of issues can be identified where vulnerable residents may need support and information.

Private Sector Housing

What do they do?

The Private Sector Housing Team aim to improve the condition of housing in the private sector in all private sector tenancies (privately rented, owner occupied, housing association tenancies) and housing types including traditional family homes, houses in multiple occupation (HMO) , mobile homes/caravans/tents and houseboats.

How do they assist vulnerable adults?

- Inspections are carried out in private rented properties (including supported living units which can fall under the definition of a HMO) and housing health and safety standards are enforced.
- A variety of financial support schemes are provided to assist in adapting, (including disabled adaptation grants), improving and repairing private sector housing to enable hospital discharge, reduce admissions and readmissions into hospital and promote independence, subject to a test of resources/eligibility criteria.

Private Sector Housing

- Home visits are available for service users who are vulnerable and unable to complete grant application forms by themselves.
- Advice is provided on getting repairs done and service users are signposted to Checkatrade and TrustMark for a list of vetted contractors and builders in the local area upon request.
- Where appropriate, service users are signposted or referred to Kent Fire and Rescue Service for Safe and Well home visits.
- Service users are signposted to the Home Improvement Agency who are able to help vulnerable people access grants for repairs or adaptations to improve their home. They can also provide a handyperson service, gardening service, decorating service, carry out home security checks and signpost vulnerable persons to other support services.
- The Health & Housing Co-ordinator based at Darent Valley Hospital aims to aid efficient and timely patient discharge and seeks to resolve home environmental issues which are impacting a patient's health and which may result in re-admission if not resolved. Following discharge, patients receive a home visit to review the home environment and ensure any necessary support to maintain their health, well-being and independence, including connecting people with community/charitable resources, is provided.
- The team work with a Home Straight Co-ordinator who offers assistance and support for vulnerable people to address clutter or hoarding within their home. Referrals for appropriate ongoing support to address behaviour change are also made where possible.
- Service users are assisted in registering for the 'Energy Deal' which is a collective switching campaign to help residents save money on their energy bills.
- To ensure vulnerable adults get the most from their utility providers, the team promote the Priority Service Register which is a free and voluntary system that the supplier uses to ensure the correct support is given to vulnerable service users.

5. COMPLAINTS

- 5.1. If a service user is not satisfied with the service they have received from the Housing Service, the Council's [Corporate Complaints Procedure](#) can be followed. Complaints leaflets are also available from the Council offices.

6. DATA PROTECTION

- 6.1. The UK GDPR and Data Protection Act 2018 regulate the processing of information relating to individuals, which includes the obtaining, holding, using or disclosing of such information.
- 6.2. The Council needs to collect and use certain types of information about its service users in order to carry out its everyday business and to fulfil its objectives and its statutory functions. The Council's:

- [Data Protection Policy](#) sets out how it will protect special category and criminal convictions personal data; and
- [Housing Services \(Landlord and Tenant\)](#), [Homelessness Services](#) and [Private Sector Housing](#) Privacy Notices explain that the Council collects personal information to administer its Housing Services.

7. EQUALITY AND DIVERSITY

- 7.1. The Council is committed to welcoming and valuing diversity, promoting equality of opportunity and tackling unlawful discrimination in accordance with the Equality Act 2010. The Council, in delivering this Policy, will have regard to the Public Sector Equality Duty and ensure that no individual is discriminated against based on their sex, sexual orientation, marital status, pregnancy and maternity, gender reassignment, race, religion, belief, disability or age.
- 7.2. The Public Sector Equality Duty is a duty on the Council and that responsibility cannot be delegated to a contractor/service provider and is a continuing duty.
- 7.3. This Vulnerable Adults' Housing Policy has been subject to a Customer Access Review, to assess the impact it will have on equality.

8. REVIEW

- 8.1. This Vulnerable Adults' Housing Policy will be reviewed every three years or earlier to address legislative, regulatory, best practice or operational issues.