



# Customer Vulnerability Policy

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<b>Approved by:</b>	Board
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## Checklist

Required check	Completed
The policy aligns with relevant legislation, regulation and the strategic objectives of Plan A 2022/25.	<input checked="" type="checkbox"/>
The policy has been informed as appropriate by transactional and/or amplified customer voice.	<input checked="" type="checkbox"/>
The policy has been impact assessed and any appropriate mitigations identified implemented.	<input checked="" type="checkbox"/>
The policy is fully aligned with and complements other related policies.	<input checked="" type="checkbox"/>
The procedures underpinning the policy have been updated as required.	<input checked="" type="checkbox"/>
The PMF/risk registers have been updated to reflect the policy's assurance framework.	<input type="checkbox"/>

## 1.0 Introduction

- 1.1 This Policy sets our commitment and approach to how we listen to, understand, and respond to customers' specific and diverse needs or circumstances in relation to any vulnerabilities they have.
- 1.2 The customer experience chapter of our business strategy, Plan A sets out our vision for customer experience: *"seamless, reliable and convenient services that customers can influence and trust to ensure their aspirations are met"*. We are committed to providing a customer experience that is fair and equitable for all and that customers are treated with respect and do not suffer unintended disadvantage because of how services are delivered.

## 2.0 Purpose

- 2.1 We recognise that some of our customers have specific needs, circumstances or vulnerabilities that may impact how they live in their home, how they access and receive our services and how they interact with us.

2.2 This policy aims to ensure all customers experience fair and equitable outcomes when receiving our services by:

- Treating people as individuals
- Consistently identifying and recording specific customer access needs and requirements based on their vulnerabilities
- Responding effectively to customers’ vulnerabilities by making reasonable adjustments to how they access and receive our services to ensure services are delivered in a fair and equitable way
- Ensuring customers do not suffer detriment when accessing and receiving our services because of their circumstances or vulnerabilities

### 3.0 Principles

3.1 The principles underpinning this policy are aligned to Livin’s values of trust, respect, innovate and working together.

- Trust – We build trust with our customers by being responsive and supportive to their needs and delivering the service they need
- Respect – We listen to customers and respond to their needs in a fair, respectful and caring way
- Innovate – We will use our data to adapt our services and do things differently when our customers need it to remove or reduce any disadvantage
- Work together – We will work well with teams and partners to understand customer needs and vulnerabilities, delivering services in a joined-up way

### 4.0 Definitions

4.1 The key terms used in this policy are defined below.

<b>Vulnerabilities</b>	Vulnerabilities are characteristics that someone possesses, either permanently or temporarily, that mean they need support or adjustment/tailoring to live well in their home or to access and receive services. These characteristics also include protected characteristics under the Equality Act 2010.
<b>Customer</b>	The term customer in this policy refers to both tenants and prospective tenants that access and receive our services
<b>Reasonable adjustments</b>	Reasonable adjustments are specific to an individual. Under the Equality Act 2010 public sector organisations must make changes in their approach or provision to ensure that services are accessible. A reasonable adjustment aims to remove or reduce any disadvantage faced by the person, but in a way that is reasonable for the organisation. Key considerations for reasonable are: <ul style="list-style-type: none"> <li>- It is effective in removing or reducing the disadvantage</li> <li>- It is practical to put in place</li> <li>- It is affordable/sustainable</li> </ul>

- 4.2 There is no standard definition for the term “vulnerabilities”, but we have applied the following considerations in this policy.
- 4.3 Vulnerabilities are characteristics that a customer possesses, either permanently or temporarily, that mean they need support or adjustment/tailoring to access and receive our services.
- 4.4 A person may become vulnerable when certain personal circumstances and characteristics mean they are significantly more likely than an average person to experience disadvantage when accessing or receiving our services. Vulnerability can also be temporary/changeable, progressive, or ongoing and can affect people in different ways.
- 4.5 We treat people as individuals and recognise that there are a range of circumstances where people may become vulnerable in these situations, while others may not.
- 4.6 We recognise that there can be a range of different drivers and characteristics of vulnerability. Appendix 1 provides a guide on this but is not exhaustive.

## 5.0 Scope

- 5.1 This policy applies to all Board members, employees and contractors of Livin.
- 5.2 This policy is aimed at all customers living in our homes or receiving our services. It applies to the delivery of all services that sit within our scope of responsibilities and legal/regulatory obligations as a registered provider of social housing for general needs.
- 5.3 In relation to data management, we will adopt a customer data framework that collects, stores, consults and disposes of customer data that is relevant and aligns with our scope of responsibilities and the Data Protection Act 2018.

## 6.0 Contribution to Plan A

- 6.1 This policy supports the achievement of our customer experience vision set out in Plan A which is: *“seamless, reliable and convenient services that customers can influence and trust to ensure their aspirations are met”*. The policy also requires all services to deliver against this vision and by making sure that all tenants receive positive customer experiences regardless of their circumstances or vulnerabilities.

## 7.0 Legislative and regulatory framework

- 7.1 The Transparency, Influence and Accountability (TIAA) Standard sets out the following required outcomes which social housing providers must deliver:

**Fairness and respect:**

Registered providers must treat tenants and prospective tenants with fairness and respect

**Diverse needs:**

In relation to the housing and landlord services they provide, registered providers must take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants

**Information about landlord services:**

Registered providers must communicate with tenants and provide information so tenants can use landlord services, understand what to expect from their landlord, and hold their landlord to account

- 7.2 The Standard sets out the importance of treating all tenants and prospective tenants with fairness and respect. This should be central to all services to tenants. This policy ensures compliance with the specific requirements in the TIAA Standard and the Code of Practice.
- 7.3 The Equality Act 2010 requires public sector organisations to make reasonable adjustments in their service delivery to ensure people are not discriminated against based on a protected characteristic. Certain types of vulnerabilities and circumstances that require reasonable adjustments are covered under the Act, such as (but not limited to) disabilities and long-term health conditions. We have a separate Equality, Diversity and Inclusion (EDI) Policy that sets out our approach to EDI and key responsibilities.

## 8.0 Policy Statements

### Recognising vulnerabilities

- 8.1 We are committed to making every contact count. This means we will identify specific vulnerabilities by listening to and being curious about the circumstances and needs of our customers. We will make sure customers have opportunities to provide us with information about those needs when they interact with us.
- 8.2 Where there is an identified need or vulnerability, we will work with the customer to understand how this affects their access to services, then find and agree reasonable and practical ways of adapting our services to meet their needs. Any support requirements will be recorded in our systems.
- 8.3 For customers who have a high level of support needs that we are unable to solely meet as a social housing provider for general needs, we will work with key partners and statutory agencies to assist our tenants to get the support they need.
- 8.4 Our employees will be trained to identify where customers may be vulnerable or experiencing disadvantage when receiving our services and to make reasonable adjustments to meet their needs, including how to refer something to the right colleague or external agency, if needed.

### Effective contact and case management

- 8.5 All contacts and visits with all customers must be recorded accurately on our core systems with reliable and appropriate case and contact notes. Relevant data must be reviewed to get an understanding of the customer and identify any vulnerabilities.

- 8.6 It is important that our customers inform us about any vulnerabilities they have. We will record relevant information in our core systems on tenants' needs relating to vulnerabilities where it is within our remit as a general needs social landlord and where it affects how they access and receive our services.
- 8.7 We will collect relevant data from customers to make sure we are providing services to meet their needs and to ensure we are delivering equitable outcomes across our services. These arrangements shall be compliant with the Data Protection Act 2018 and operate only within our remit as a social housing provider for general needs.

#### Service expectations

- 8.8 Where there is an identified vulnerability, all services are responsible for working with the customer to make reasonable adjustments to support how they can access and receive services. Where a case is identified as higher risk, it will be flagged as needing additional support and monitoring to ensure it is managed appropriately.
- 8.9 All customer facing policies must have an accompanying Equality and Vulnerability Impact Assessment (EVA) prior to approval. Policies and procedures must then identify known relevant vulnerabilities and set out how services can be adapted.

#### Repairing and maintaining homes

- 8.10 In line with our Repairs and Maintenance Policy, we will prioritise repairs for customers with vulnerabilities if their health or wellbeing would be negatively impacted without adjusting the service. This includes inspection and repairs where there could be an impact to the health and wellbeing of customers living in our homes.
- 8.11 We will assess the needs and vulnerabilities of customers who are having planned works in their homes and communal areas and will provide tailored customer liaison to ensure they are kept informed throughout and make adjustments during the works if the customer would be disadvantaged otherwise.
- 8.12 In line with our Aids and Adaptations Policy, we will support customers to have adaptations made to their home where there is a need, and it is possible to do so. We will provide ongoing communication and support to customers throughout this process to ensure their needs are understood and met.
- 8.13 We will consider customer vulnerabilities in the delivery of our property safety and cyclical maintenance programmes (for example, gas servicing, electrical testing, fire safety, stairlift servicing) to ensure the safety of customers.

#### Allocations and lettings

- 8.14 In line with our lettings policies, we will use information about a customers' circumstances and vulnerabilities when letting homes to make sure we offer them a home that meets their needs, including the provision of aids and adaptations or an already adapted home where appropriate. Through our onboarding process, we will work with customers to make

sure they are able to understand their tenancy agreement, their rights, and our obligations as a landlord.

#### Rents and financial inclusion

- 8.15 We will provide accessible ways of paying rent and our financial inclusion team will consider customers' circumstances and vulnerabilities when determining how to support the customer and what action to take. We also recognise that financial hardship can cause people to become more vulnerable.

#### Anti-social behaviour

- 8.16 In line with our Anti-social Behaviour Policy we will adopt a victim centred approach to how we deal with anti-social behaviour. We will consider customer circumstances and vulnerabilities when dealing with victims and perpetrators of anti-social behaviour to determine the most appropriate type of support or action, working with customers and external support agencies, where needed.

#### Tenancy support

- 8.17 We operate a tenancy visit programme using a risk-based approach and we will use customer vulnerability data to target the programme delivery and support, where appropriate to support customers with vulnerabilities to sustain their tenancy.

#### Domestic Abuse

- 8.18 In line with our Domestic Abuse Policy, we will consider customer vulnerabilities to understand their needs and ensure we respond appropriately to reports of domestic abuse.

#### Customer engagement

- 8.19 It is important that customers with vulnerabilities can engage in our Customer Voice Programme. In line with our Customer Voice Policy, we will work with customers with vulnerabilities to make reasonable adjustments to enable them to access those opportunities.
- 8.20 We will provide accessible community facilities which enable our customers to participate in socially inclusive activities and engage with various support services.

#### Visiting homes

- 8.21 We will mutually agree appointments and will ensure that appointments and visits are convenient to customers and consider vulnerabilities. For example, knocking louder, waiting longer for someone to answer, no cold calling, or ringing ahead.

- 8.22 When attempting to access homes, including legal enforcement action (such as gas servicing) we will take customer vulnerabilities into account. We will adapt our approach to assist customers when gaining access, within the requirements of appropriate legislation and the tenancy agreement.

#### Customers who need alternative access arrangements

- 8.23 For customers who experience language or literacy barriers, we will work with them to find and agree the most suitable way to access services. This might include appointing a trusted representative or advocate or using our translation and interpretation services.
- 8.24 Where it is identified that a customer has very limited access to services, our housing team will work with these tenants to find suitable ways of accessing services. For example, appointing a trusted representative, use of translation services or providing information in an alternative format.
- 8.25 At a customer's request, we will work with them to appoint a trusted representative or advocate to help them successfully access and receive services.

#### Digital Services

- 8.26 We are committed to the provision of seamless, responsive and convenient services and as such are a digital first organisation. We advocate, encourage and support our tenants to engage with us via the most efficient and effective method, suitable to their needs, and will assist tenants or their advocates to engage with us digitally.
- 8.27 Whilst we are a digital first organisation, we know that some customers may have no means of accessing those services. In those cases, we will provide information to customers in alternative formats that relates to:
- How services can be accessed
  - The standards of service they can expect
  - Rent and service charges
  - Our responsibilities and theirs for maintaining homes, communal areas, shared spaces and neighbourhoods
  - Tenants' rights and their responsibilities
  - Our legal obligations and regulatory requirements that we must meet
  - How to make a complaint
  - How to get involved
  - The rights disabled tenants have for reasonable adjustments

#### Complaints and feedback

- 8.28 In line with the Customer Complaints, Compliments and Feedback Policy, we will work with customers who have specific needs and vulnerabilities to make sure they can access the



service, have their views listened to and receive their complaint response in a way that meets their needs.

8.29 Customers can provide feedback about the services they have received in respect of this policy. If a customer is dissatisfied with the service they have received from us, they can make a complaint to us in line with our Complaints, Compliments and Feedback Policy.

We define a complaint as:

**‘Any expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, our own employees, or those acting on our behalf, affecting a resident or group of residents.’**

## 9.0 Roles and responsibilities

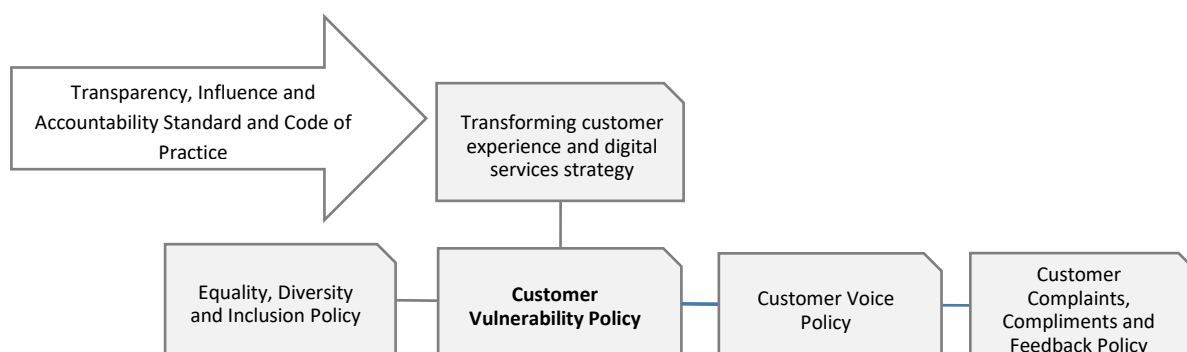
9.1 Roles and responsibilities under this policy are outlined below.

<b>Board</b>	The Board has overall responsibility for this policy including approval and receives assurance via quarterly performance reports
<b>Housing and Communities Committee (HACC)</b>	The HACC is responsible for seeking and receiving assurance on monitoring and compliance with this policy.
<b>Executive Management Team (EMT)</b>	The EMT has oversight over compliance with this policy via assurance reports on policy monitoring and compliance
<b>Director of Customer Experience and Insight</b>	The Director of Customer Experience and Insight has the strategic responsibility for overseeing the implementation of this policy, as well as providing compliance assurance to the HACC
<b>Heads of Service</b>	All heads of service are responsible for implementing this policy in their service area, ensuring all customer facing services and related policies and procedures are compliant with this policy, including the actioning of recommendations from EVA’s.
<b>Customer Experience Manager</b>	The Customer Experience Manager has responsibility for the overall implementation and monitoring of this policy and for managing the programme of EVA’s.
<b>All managers</b>	All managers are responsible for ensuring they and their teams apply this policy in their day-to-day work
<b>Employees</b>	All employees are responsible for applying this policy in their day-to-day work

9.2 This policy will be communicated to employees via the Intranet and communicated to customers via the website and in other formats where needed. Those who have responsibilities under this policy will be required to formally accept and confirm understanding of the policy and will confirm understanding following appropriate training, advice, and/or guidance.

## 10.0 Related strategies and policies

10.1 This policy should be read in conjunction with the key related documents shown in the graphic below:



## 11.0 Monitoring, assurance and review arrangements

11.1 Assurance on compliance with this policy will be gained via a range of methods, as set out in the following table:

Type of assurance	Key source	Frequency
Management assurance	Quality assurance monitoring of high-risk and medium risk cases Quality assurance monitoring of contact recording and case management (CX 360 monitoring) Performance metrics: Satisfaction with services and that tenants with vulnerabilities feel they are treated with fairness and respect Management information measure – number of complaints received where vulnerabilities and protected characteristics had not been considered	Monthly  Quarterly  Quarterly
Corporate Oversight	CX 360 audits (EMT) Equalities and Customer Vulnerability monitoring report (Housing and Communities Committee)	Quarterly  Annual
Independent assurance	Internal audit of this Policy Internal audit of customer data	One-off audit 2025/26  Every three years

11.2 This policy will be reviewed every three years, unless there is significant development that would require a more urgent review e.g. new legislation or regulation.

## Appendix 1 – Vulnerability Drivers and Characteristics

<b>Drivers</b>	<b>Health</b> – health conditions or illnesses that affect how someone performs day-to-day tasks	<b>Life Events</b> – things that happen in life such as bereavement, job loss, relationship breakdown	<b>Capability</b> – a person’s ability or level of confidence to access services and manage situations	<b>Resilience</b> – a person’s ability to deal with situations
<b>Characteristics and circumstances</b>	Physical disability, temporary or permanent  Severe or long-term illness	Bereavement  Relationship breakdown  Domestic abuse	Limited/poor literacy or numeracy skills  Limited/no English	Low emotional resilience  Inadequate or erratic income or

	Hearing or visual impairment	Income shock	language skills	over-indebtedness
	Mental health condition or disability	Caring responsibilities	Limited/no digital skills	
	Addiction	Retirement	Learning difficulties	
	Low mental capacity or cognitive disability	Leaving care	No or low access to help and support	

**Adapted from research and guidance developed by the Financial Conduct Authority ‘Guidance for firms on the fair treatment of vulnerable customers’, 2021**