



WCHG Help to Access Our Services Policy

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Responsible director	Paul Seymour Executive Director Customers and Communities
Policy monitoring body	Customer Experience Committee
Resident input into policy date	Consultation with customers through survey Readers Panel review
Date for policy review	January 2027
Linked strategies/policies	Data Protection policy Special Category Data policy Wythe Everyone Strategy
Statutory and Legal Framework	This policy takes account of all legislative and regulatory requirements relevant to Registered Providers.
Version/date	Final V1 – January 2024

WCHG Help to Access Our Services Policy

1. Purpose and scope

- 1.1. The purpose of this policy is to set out our high-level position around tailoring our services to meet individual needs and respond to identifiable risks. As well as Wythenshawe Community Housing Group's (WCHG) commitment to assisting customers defined as vulnerable, making sure they receive the help they need to sustain their tenancy.
- 1.2. We want to make sure that we are consistent in our approach by giving WCHG colleagues and residents with information to help identify and respond effectively to residents' needs.
- 1.3. This policy will set out:
 - how we define vulnerability and how we respond to those customers' needs,
 - how we recognise and uphold the legal housing rights of our residents, and specifically how we respond to asks for a reasonable adjustment
 - how we consider additional needs not covered by legislation in line with best practice and
 - how we show clear the support residents can expect from us
- 1.4. This policy does not set out all the different ways in which we might tailor a service we deliver. We aim to foster a culture where colleagues feel empowered to confidently and sensitively respond to the diverse needs of residents.
- 1.5. This policy centres on residents who may be vulnerable but have the ability to make their own decisions. Where a resident is assessed as not having the ability to make decisions we will work with their chosen spokesperson
- 1.6. This policy outlines the commitments WCHG has for maintaining inclusivity and fairness when delivering services to residents.
- 1.7. Customers are at the heart of all we do as an organisation. We will continue to talk to, co-create and engage with them to make sure our policies and process are reflective of their needs.

2. Definitions

- 2.1. WCHG through discussion with customers and colleagues we will be using this language throughout this policy.
- 2.2. We recognise that not every individual who is protected by the Equality Act (2010) has additional needs related to housing. We recognise residents may not identify with being 'vulnerable' but may have additional needs. These needs may vary over time and may have no bearing on a resident's ability to sustain their tenancy or ask for a service.
- 2.3. That is why we are not using 'vulnerable' to describe our service offer. Where the Housing Ombudsman defines customers as being vulnerable, we will be using priority customers. And describing any services relating to vulnerability or may impact the customers as inclusive services.

3. Defining vulnerable and vulnerability

- 3.1. We have adopted a fluid definition of the term vulnerable that is situation-based. We recognise that vulnerability can be experienced by any customer at any time.
- 3.2. A vulnerability arises when a housing issue disproportionately impacts a customer due to their personal circumstances or characteristics (either protected or un-protected) as a result, we give extra support or a quicker response to make sure they are not disadvantaged.

Non-exhaustive examples:

- Housing issues include housing costs, property conditions, including lack of heating or hot water, safety.
 - Personal circumstance includes experience of homelessness, experience of domestic abuse or violence, alcohol/drug dependency, or financial security, digital access, a short-term health issue.
 - Unprotected characteristics include carer status, education, height, weight.
- 3.3. Protected characteristics are listed under the Equality Act 2010. They include age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation.
 - 3.4. The term 'vulnerable' can also be used in a specific, legal context. For example, the term 'vulnerable' in legal homeless guidance has a precise and technical meaning that is not adopted here. The definition here applies to all general housing management policy. Any technical definition set out in any other policy, for example safeguarding, will replace the definition set out here.

4. Reasonable adjustments and services available

- 4.1. Residents can ask for a reasonable adjustment from any colleague at WCHG. We will take into consideration a vulnerable resident's needs and circumstances, to help them live well and carry out their tenancy.
- 4.2. A reasonable adjustment is a change to how we deliver a service or a physical change to a property to make sure a resident is not disadvantaged. When looking at whether an ask is reasonable, we will consider:
 - Effectiveness: the adjustment should fully address the resident's need
 - Practicality: we must be able to practically make the adjustment
 - Resources: how much time the adjustment will take and any related costs
- 4.3. We have clear process' in place for colleagues to assess the reasonableness of a request. This means residents will receive a response to any requests they ask for.

5. Identifying and responding to vulnerability

5.1. A resident's vulnerability may be identified by:

- The resident or their representative contacting us for extra support.
- Any WCHG colleague who is in contact with the resident.
- A referral from an external agency/organisation

5.2. There are several touchpoints in which we may confirm with a customer, details of their vulnerability or seek to confirm information we already hold on them. Examples of touchpoints where customers will be asked for information on vulnerability or if there is a support needed for a vulnerability:

- Tenancy application and sign-up
- Annual home visits
- Conversations with our Customer Hub
- Financial Inclusion conversations
- Living well referrals and Tenancy Audit visits

5.3. In specific circumstances, we will ask for evidence of any additional needs, usually in the context of lettings, where a transfer is needed on medical grounds. Where we give support for tenancy sustainment, for example support with a Universal Credit or housing benefit application, we may also ask the resident to give us relevant information.

5.4. We recognise the important role that advocates can play in supporting vulnerable residents to make sure they are receiving a good service. With the resident's explicit consent, we will correspond with a family member or third party on their behalf. We will not share any personal data with advocates or third parties if consent is not freely given, except where there are specific safeguarding concerns, as outlined in WCHG's policies.

6. Recording and monitoring customer data

6.1. Where a resident gives us information it will be used to inform how we deliver our services, this is recorded on their individual account and looked at ahead of all interactions that it affects. We give our WCHG colleagues and contractors (where needed) instructions on how to tailor the service, for example, by giving the resident time to answer the door.

6.2. We regularly ask residents if there is any information that they wish to share with us, while also using our professional curiosity to proactively identify possible needs. We also rely on residents to keep us informed about any changes to your personal and/or household circumstances. We may carry out audits and review our records from time to time and/or once we are alerted to a change in circumstances.

6.3. Whenever we process sensitive data for the purposes described in this section, we will make sure that extra safeguards are always in place, as written in our Special Category Data ('appropriate use') policy. We will:

- select a valid lawful basis and relevant conditions for processing the data, in line with the legislative framework set out in the next section.
- only process the minimum amount of data for the length of time required to achieve these purposes,
- record the processing activity in our central library of business processes, and
- inform customers and colleagues that we are processing the data in accessible privacy notices and statements.

7. Legislative framework

7.1. This policy statement incorporates several legislative and regulatory requirements, which includes but not limited to:

- Equality Act 2010
- UK General Data Protection Regulation (UK GDPR) / Data Protection Act 2018
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- The Human Rights Act 1998
- Domestic Abuse Act 2021

Other relevant documents

- The Social Housing Regulator's Transparency, Accountability and Information Standard requires landlords to consider the diverse needs of their residents.
- The Housing Ombudsman Complaints Handling Code 2024 states that landlords must consider whether a resident is vulnerable or at risk when responding to complaints.
- Article 8 of the Human Rights Act an individual has a right to privacy, or the right to 'physical or psychological integrity'.
- WCHG Reasonable adjustment statement

Appendix 1

Examples of reasonable adjustments these can be physical or online:

- Aids and adaptations to a property dependent on need.
- Allowing longer for you to answer the door.
- Documents and letters in different formats such as braille or large print or translation of documents and letters into other languages
- Arranging a joint visit with a support worker/representative.
- Hearing loops in our offices
- Visits specifically from female colleagues or in pairs
- When ordering a repair, if a member of the household is vulnerable and a delay will be bad for their health the repair may be sooner than its scheduled target date (but should be booked as scheduled with a note to show the vulnerability).
- If damp and mould are reported and a member of the household is vulnerable the remedial process should be escalated in line with this.
- Visit in person to explain matters or explain the content of a letter by telephone call.
- Support with welfare benefits and money advice rather than enforcement for a vulnerable person with unpaid rent debt.