



TITLE	Enabling Independence Policy (vulnerable customers)
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This Policy relates to our commitment to support people who are vulnerable and/or have special needs. The partner associations are committed to encouraging and helping individuals to achieve independent living in the community if that is their choice.

1. Definition

The policy relates to vulnerable people that are customers of the Group or users of our services. Our definition of people who are 'vulnerable' are members of our communities who require additional support to reach a goal of independent living or people who are or may be unable to take care of his or her self or to take steps to protect him or her self from significant harm or exploitation.

Within this category we would include the following client groups who are an important and growing portion of our customer base:-

- People vulnerable due to their age (young and old).
- People with disabilities, including learning and physical disabilities, acquired brain injuries and those with mental health issues.
- People who acutely or chronically ill.
- People with substance abuse issues.
- Young people including those leaving care.
- Pregnant teenagers and young parents
- Those who are homeless.
- People who have experienced domestic violence.
- Those with refugee status or seeking asylum.
- People leaving prison or other penal institution
- Those caring full time for other vulnerable people.
- People who due to age, lack of experience, lack of support etc are vulnerable

As well as living independently, vulnerable people are often accommodated in a variety of other types of accommodation which can include:

- Sheltered housing.
- Specialist housing for people with identified care and support needs.
- Housing related support services including transitional outreach support
- Residential care homes.
- Emergency housing such as hostels and refuges, lodgings and Nightstop.
- Foyers which provide housing linked to training.

1. Policy Statement

1.1 The Group's vision is to 'create places where people are proud to live and work'. This policy outlines the Group's approach to dealing with the support of vulnerable tenants/service users effectively and in line with our core values:

- Providing excellent services
- Acting with integrity
- Delivering creative solutions
- Valuing People

We recognise that, as a social housing provider, in order to meet our aims, our role extends beyond the provision of bricks and mortar in embracing a wide range of diverse and changing needs and aspirations.

We are committed to treating people as individuals, enabling them to make their own choices and decisions about what services they want, respecting their preferences and wishes, tailoring services to meet their requirements and involving them where possible in planning, delivering and monitoring services. We also recognise that individual needs may change over time and that services should be adaptable to change.

We recognise that people with special needs should have a range of housing and support options open to them, ranging from specialist schemes catering solely for a particular group, through independent housing combined with a range of support services, to ordinary general housing stock without support services.

2. Compliance:

2.1 This policy meets the requirements of the National Health Service and Community Care Act 1990 which states Housing Associations must *"co-operate with social service departments and health authorities to identify and meet housing needs of vulnerable people"*. The Act emphasises that those who require support/care to enable them to remain in general or supported housing in the community should be enabled to do so, rather than them moving on to residential, nursing homes or hospital provision. This reinforces the importance of good quality and affordable housing as the foundation of community care and often the key to independent living.

This policy also meets the Tenant Services Authority's (TSA) 'Involvement and Empowerment' standard that states that *"registered providers must design and deliver housing services that tenants can access easily. Tenants must be offered choices over the services they receive, and be treated with fairness and respect. In relation to all the standards, registered providers must consider equality issues and the diversity of their tenants, including tenants with additional support needs. Registered providers must understand their tenants' needs and use this information to design and deliver housing services and communicating with tenants"*

The TSA has also set a general specific requirement that *"for all the standards, registered providers must consider equality issues and the diversity of their tenants, including tenants with additional support needs and incorporate choices that are designed to meet"*



the diverse needs of their tenants.”

Finally, this policy meets the requirements of the relevant sections of the Audit Commission’s Key line of Enquiry (KLOE) ‘Supported Housing’ (number 11) standards and the Supporting People Quality Assessment Framework and support planning standards.

3. Policy Purpose and Aims:

3.1 The needs of the differing vulnerable groups and of individuals within these groups will vary regarding the delivery of services to ensure equality of provision. The following are areas of services that will be considered when looking at commitment to our vulnerable customers. Each area is considered in turn below:

- ❖ Customer Involvement
- ❖ Accessing our services
- ❖ The right housing
- ❖ The right support
- ❖ Assistance to obtain additional services
- ❖ Adaptations to properties

3.2 Customer Involvement:

3.2.1 One of our primary commitments to vulnerable customers is to work with them in finding effective ways of giving them a voice in designing and planning services for the future. This may take the form of providing and seeking information from existing and future customers, to involvement in decision-making and policy and strategy formulation.

The Group has a customer involvement strategy that sets out our commitment to provide a wide range of accessible opportunities for customers to become involved and influence service development. However we recognize that there is often an extra challenge in involving vulnerable people effectively. We will therefore continue to develop new models of involvement and are particularly committed to effectively involving customers of short term services, seeking ways to hear their ‘voice’ through a variety of involvement options.

3.2.2 Accessing our services:

We are committed to responding to people’s access needs in innovative and flexible ways. We have laid out our commitments in this area in our Care and Supported Housing Access Statement which states our aim to work towards as fully accessible services as are possible for our customers. This often sees us deliver solutions that are over and above what the law requires of us in the Disability Discrimination Act etc.

As well as working with our customers, we will work with other providers across our areas of operation, particularly those with specialist knowledge and experience of working with vulnerable people, to develop our range of activities which offer customers opportunities to become involved in shaping services and monitoring quality.



Partner Associations are committed to providing a good quality and effective service to all of its customers and the following are a series of policy commitments in relation to the housing and support of vulnerable service users:

1. Customers with special needs will always be treated with dignity, respect and sensitivity and in a non-judgemental and non patronising manner.
2. Partner Association's offices, reception and interviewing facilities are all well signposted and are accessible to customers with disabilities.
3. Home visits will always be offered to customers who are housebound because of disabilities or other special needs.
4. Partner Association's staff will ensure that when appropriate they will consult, liaise and work with customers with special needs and their carers, advocates, interpreters and their families. We train all our staff in equality and diversity issues to enable appropriate customer care and service delivery to be provided to vulnerable people.
5. Appropriate arrangements will be made for communicating with customers who have learning difficulties through carers, advocates or families. Arrangement can be made for signers or interpreters to be present at interviews with customers who have hearing difficulties, or for whom English is not their first language.
6. We will provide guidance and support, where requested, to support the completion of any forms. Written communications to customers with special needs will be clear, concise and simple and in everyday language in accordance with the Plain English Campaign's guidelines. All of Partner Association's printed literature is available in large print, on audiotape and can be translated into Braille.
7. Customers who need help to understand leaflets and complete forms such as housing application forms and housing benefit forms will be identified and assisted.

3.2.3 **The right housing:**

We are committed to letting homes to those in the greatest housing need but those with medical and social care needs are often two of the five priority groups highlighted in allocations policies. However, we recognize that there are circumstances, often associated with the needs of vulnerable people and sometimes at a time of crisis, where lettings policies do not enable a housing solution that meets the specific housing needs of the applicant. Where possible, and within the confines of choice based lettings protocols, special consideration of such cases will be undertaken. This can enable forward planning and the coordination of supporting services from other agencies to improve the chances of the tenancy being sustained.

Partner Associations will take in to account the physical environment to ensure that as far as possible it is appropriate to both the current and changing needs of tenants with special needs. Therefore:

1. Partner Associations will ensure that all new properties conform to Scheme Development Standards.
2. Schemes are developed to meet 'Secure by Design' principles.
3. A register of properties is kept which identifies the stock suitable for people with special needs, such as properties that have been adapted for people i.e wheelchair or mobility standards).

4. Tenants whose homes are no longer suitable for them to remain in because of their special needs will be helped, where appropriate, by:
 - o Providing physical adaptations via Partner Association's own funds or Local Authority Disable facilities Grant.
 - o Signposting customers to obtain disability aids from social services and other agencies.
 - o Referring them to agencies, which can provide appropriate support or care services.
 - o Providing alternative suitable housing if possible or referring them to other suitable landlords.
5. Partner Associations will be sensitive to the needs of residents and will, where possible, use contractors with appropriate experience of working with specific groups.
6. Tenants will be assisted to maintain their tenancy and where appropriate will be offered housing management support to integrate into communities in a positive way.

3.2.4 **The right support:**

Support is provided by Partner Associations directly and in partnership with other agencies to enable vulnerable tenants to sustain their tenancies. Support may also be provided by any individual where the customer has an individual budget and employs staff direct or through a consortium. Support will be provided for as long as needed/appropriate, but it will always be our intention to encourage as high a level of independent living as possible.

A list of the current agencies we work with is at appendix 1. We also assist our vulnerable customers in obtaining advice, support, and services from other agencies including the Local Authority, Health Service and voluntary organizations.

Examples of areas where we/partner agencies provide support include:

- ❖ Assessing needs and risk
- ❖ Support planning
- ❖ Homelessness services
- ❖ Help in tenancy set up
- ❖ Safety and security advice
- ❖ Developing social skills
- ❖ Advice in accessing training/employment
- ❖ Welfare Benefit advice
- ❖ Developing independent living skills, including household budgeting
- ❖ Mediation
- ❖ Advice regarding accessing local facilities
- ❖ Advice, advocacy and liaison

Where we deliver support services ourselves we work to a clear framework on support planning and risk assessment (see separate policies and procedures). Where we have a support provider delivering support services to tenants at our property we expect the same standards (be they regulated by Supporting People or the Care Quality Commission) and monitor the delivery of this support via quarterly review meetings with providers.

Where individual customers employ their own staff, we will have no control over the quality of the support provision that is given. We will work with our tenant and local social service teams to ensure that the support given to the customer is as good a standard as we or support providers are offering. That said the customer is the person who chooses the support service and they have a duty to ensure the safety and quality of the people that provide their care and support.

3.2.5 **Adaptations to properties**

Providing or adapting properties to meet the needs of older customers and those with physical disabilities to enable them to stay in their own homes longer is a priority for WM Housing.

We undertake a number of activities that contribute to adapting properties and these are detailed in our aids and adaptations policy and include:

- ❖ Undertaking adaptations for individual tenants during our kitchen and bathroom replacement programme where funding is available.
- ❖ Minor adaptations including items such as lever taps, grab rails, key boxes, stair rails and ramps.
- ❖ Helping to access Disabled Facilities Grants for our tenants.
- ❖ We also have some purpose built (wheelchair accessible) accommodation.
- ❖ Our new build properties meet the requirements of part 'M' of the building regulations and are therefore built to a good mobility standard. We will build to lifetime homes standard where we receive grant and the granting body requires such a standard.

- ❖ In 2009 we employed consultants to complete a full access audit on our Care and Supported Housing schemes. Where schemes were not found to be fully accessible, actions were assigned and are being implemented subject to priority and available funds.

4. **Funding**

Delivering services that provide a better quality of life for vulnerable people to live more Independently and maintain their tenancies has a cost. The support provided however can lead to a reduction in the need for hospitalisation, institutionalized care or homelessness.

Funding for our schemes currently comes from a variety of sources from Charitable income through to Housing Benefit. Our main source of supported housing funding however is from the Government's Supporting People programme (currently being delivered through Local Area Agreements and as such are subject to review by each Administrating Authority. Continuance of funding and therefore the future direction and development of services depends on a variety of key criteria, broadly: strategic relevance and demand for services, quality of services and value for money.

Locally and nationally, there are greater demands for funding of services than supporting people grant to fund them. We will therefore:



- ❖ Continually review our services to ensure they deliver value for money
- ❖ Work with other providers to identify and reduce overlaps in provision
- ❖ Seek alternative sources of funding if they are available.

Decommissioning/reduced funding of services is a risk of which the Group is aware and factors into future strategic planning.

5. Partnership Working

- 5.1 Our partner associations have a strong ethos of partnership working. Collaborative working is paramount in this field as no single stakeholder can deliver the services to meet the diverse needs of these groups. Recognising our role as a major housing provider, engaging with Local Strategic Partnerships, multi-agency working, partnerships with customers, signposting to other services and providing information about support etc.

With regards to enabling independence, our partnerships span across strategic to service delivery.

6. Complaints

- 6.1 The Group and its Partner Associations treat all complaints of poor service seriously. Any complaint received by a customer with special needs or their carer, advocate, interpreter or family will be dealt with in accordance with the Groups policy on Complaints.

7 Confidentiality

- 7.1 The Group and its Partner Associations treat all personal information given to it regarding customers with special needs as strictly confidential. The way we deal with confidential information is laid out in the Groups policy on Access to Information and Confidentiality.

8. Equality Impact Assessment

- 8.1 We will ensure that our services reflect the diverse communities that we work with and are in line with our policies on equality and diversity .

WM Housing Group carry out Equality Impact Assessments to understand the impact that our policies may have on groups of people or individuals. These impacts may be positive or negative. We have reviewed our policy with partner and employees from within this area of the business and also with our Disability Equality Group and found that the impact on services will not change (positively or negatively) with the adoption of this policy. This is mainly due to the fact that there are no new commitments in this new policy than there were in the 3 (old) policies that were merged to form this document (i.e the WM Access to Accommodation - Special Needs and Sustainable Tenancies -Special Needs policies and Whitefriars Enabling Independence policy)

9. Performance Measures and Targets

- 9.1 The effectiveness of this policy will be subject to scrutiny as co-regulation develops across the Group and customers and partner organisations play an active part in this process. Success will ultimately be judged by our customers including views from the variety of forums (i.e Disability Equality Group) and scrutiny panels that exist.

Performance will be judged by:

- Using profiling data and feedback from surveys (STATUS etc) to monitor the number and needs of our vulnerable customers and their satisfaction with the services they are provided.
- Requests v spend on aids and adaptations related provision
- Success will also be judged against the number of vulnerable customers that maintain their independent living aims

10. Monitoring and Review

10.1 This policy was approved in March 2010 and is due for review three years thereafter.

11. Responsibility

11.1 This effective implementation of this policy is the responsibility of the Group's Head of Care and Supported Housing

12.0 Associated Documents/Policies

12.1 This policy links with the following Group policies:

- Access to Housing and Lettings Policy
- Group Asset Management Strategy
- Aids and Adaptations Policy
- Whitefriars Sheltered Housing Policy
- Whitefriars Hostel Management Policy
- Group Equality & Diversity Strategy & plan & related diversity policies
- Group Customer Involvement & Excellence Strategies



CASH STOCK & SERVICES & PROPOSED DEVELOPMENT FOCUS

There are two main areas in which the WMHG currently deliver CASH services and in which we wish to see our CASH portfolio grow:

- **Accommodation-based services** which provide a home as well as support
- **Community-based (outreach)** services working with individuals who live in their own home.

In our CASH strategy we have stated we want our future focus for CASH developments to be:

- **In line with Supporting People strategies**
- **With the Group acting primarily (but not always) as a landlord/ property owner**

Where we have a role as *landlord only*, we have said we will aim at providing accommodation to service users with the following special needs:

Learning Disabilities	Physical Disabilities	Mental Health
Acquired Brain Injuries	Cerebral Palsy	Women fleeing domestic violence
Older people	Homeless people	Spinal Injuries
Asylum Seekers	Teenage parents	

Delivering the support at these schemes are a number of '*preferred partners*':

Mind (Mental Health)	Scope (Cerebral Palsy)	Aspire (Learning Disabilities)
Mencap (Learning Disability)	McIntyre Care (Learning Disability)	Praxis (Learning Disabilities)
Dimensions (Learning Disabilities)	Headway (Acquired Brain Injuries)	Lifeways (Learning Disability)
Keyring (Various vulnerable)	Primary Care Trust (Elderly care home)	Adullam Homes (Ex Offenders)
West Mercia Women's Aid (Women fleeing domestic violence)	Birmingham and Solihull Women's Aid (Women fleeing domestic violence)	
Coventry Community Services (Older people support)	Coventry Cyrenians (Homeless Services)	Valley House (Teenage Parents)

Where we have chosen to be *landlord and direct service provider*, we currently provide services to

Young People (3 Foyers, shared accommodation, Nightstop emergency accommodation, prevention work, floating support, sports coaching & training)		
Young Parents (Floating support)	Young People leaving Aftercare (Accommodation & floating support)	Children (Homeless prevention in schools)
Older People (Housing with care, ordinary sheltered schemes & floating support)		
Homeless people (Accommodation based direct access hostel and move-on floating support)		