

VULNERABLE TENANTS AND LEASEHOLDERS POLICY

This policy was approved on XXX

Haringey
LONDON



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1 Introduction

- 1.1 This policy sets out our commitment to assisting vulnerable people living in Council homes who rent on a secure or probationary tenancy or occupy as leaseholders from the Council to access our housing management services and to sustain their tenancy.
- 1.2 For clarity, this policy does not include tenants in temporary accommodation, sheltered, or supported housing whose support needs are addressed within specific policies and procedures.
- 1.3 For the purpose of this policy, we include all members of a tenant or resident leaseholder's household within our assessment of a tenant's or leaseholder's vulnerability. Our focus though is on supporting the household to access our housing management services and to sustain their tenancy.
- 1.4 We take a resident-first approach, putting residents at the heart of decision-making so that they can tell us how they want to access services and receive support. We work in partnership across the Council and with other organisations to provide wide ranging support to vulnerable residents at a local level that focuses on early intervention.
- 1.5 We take a holistic view of tenancy sustainment: supporting people to live well in the community is a key factor in preventing homelessness and is therefore a core housing management task for us. Tenancy sustainment includes help with isolation or accessing healthcare, education, and employment, as well as help with money management, debt or rent arrears, and support with complex problems such as hoarding.

2 Aim of the policy

- 2.1 Our vision as a Council is for Haringey to be a place where everyone can live healthy and fulfilling lives and feel connected and safe in communities where people support each other.
- 2.2 The objectives of this policy are to set out:
 - How we define vulnerability
 - How we identify vulnerable residents
 - Factors such as communication needs and risk we consider alongside vulnerability
 - How we record and review residents' vulnerability
 - Our approach to communicating with vulnerable residents
 - How we communicate residents' vulnerability to contractors and external partners
 - How we put external support in place for vulnerable residents
 - How we support specific groups of residents including young care leavers; and residents with specific needs including around self-neglect and cuckooing
 - How we support residents across specific service areas

3 Definitions and key terms

- 3.1 A **vulnerable** resident is anyone who currently experiences difficulties with everyday living; and, in order not to be disadvantaged by those difficulties, needs either:
- additional support or service adaptation to access our housing management services; or
 - additional support to sustain their tenancy
- 3.2 We understand that a resident's vulnerability may arise from a personal characteristic, from material conditions including poverty, or from life events. Some groups of people because of structural disadvantage find it more difficult to access services than others. Very often, vulnerability arises from a combination or interaction of these factors.
- 3.3 Vulnerability in the context of this policy is unlikely to be a permanent condition. Where somebody is likely to remain vulnerable for a long period - or even permanently - the needs they have because of that vulnerability will change over time.
- 3.4 At points during our lives, we all experience vulnerability. Vulnerability exists alongside an individual's strengths and resilience. Vulnerability is neither a negative, a final, nor an all-encompassing definition.
- 3.5 Vulnerable individuals need us to make different kinds of support and different adaptations to service provision in different contexts.
- 3.6 The terms 'vulnerable' and 'vulnerability' are not used in this policy to imply any statutory meaning or responsibility. In other areas of the Council's work – including in relation to safeguarding, homelessness and social care duties – the term 'vulnerable' has a specific meaning that does not apply in this context.
- 3.7 When we use the term 'resident' in this policy, we mean a Council tenant or resident leaseholder, or a member of their household.
- 3.8 Concern Cards are used to notify colleagues in housing management that a resident may be vulnerable and might need additional help or adaptations to access services or sustain their tenancy; or that there are safeguarding concerns.
- 3.9 Cuckooing is the practice where somebody's home is taken over by another person, or by a group, for criminal purposes such as dealing or storing drugs, or for illegal sex work.

- 3.10 Disclosure and Barring Service (DBS)** check is a record of a person's criminal convictions and cautions. It helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups. and replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA).
- 3.11 Haringey Multi-Agency Solutions Panel (MASP)** provides creative, problem-solving support and advice to staff across Haringey who are working with residents displaying higher levels of complexity. A range of identified organisations are represented at the panel
- 3.12 Housing management** is the activities carried out by the Council and on the Council's behalf to meet contractual obligations and social commitments to its rent-paying tenants and its leaseholders and to repair and maintain its wider housing estate. These activities cover a range of functions including but not limited to rents and service charge collection, tenancy management, estate management, repairs and maintenance, tenancy support including money advice and 'coaching' activity.
- 3.13 The Safeguarding Policy** consists of the policies and procedures as provided on the Council's website and dedicated pages for Children and Adults.

4 How vulnerable residents are identified

- 4.1 We ensure that all housing staff, contractors, and agents regularly receive high-quality training, supervision, and guidance on identifying, assessing, and supporting vulnerable tenants and leaseholders. To support this, we provide regular briefings and resources appropriate to staff roles.
- 4.2 Most of our residents are not vulnerable in terms of this policy, and we do not assume that whole groups of people with specific characteristics are vulnerable. Every resident is treated as an individual when assessing vulnerability and determining the level of support required.
- 4.3 We focus on understanding what an individual needs us to do instead of categorising the reasons they need that extra support or consideration.
- 4.4 At the same time, to ensure that individual needs are identified we look for common indicators of vulnerability. These are set out in separate procedures but include: underlying characteristics which help to inform our staff training and underpin assessment forms. such as
 - age
 - disability,
 - experience of care;
 - ability to act, engage and cope such as language skills,
 - addiction, and
 - learning disability; and
 - exceptional life events such as a recent history of street homelessness, bereavement, or
 - discharge from hospital or other institutional care.
- 4.5 When we become aware that a common indicator of vulnerability is present, we proactively assess whether that resident requires any specific adaptations or priority to access housing management services, and whether they need additional support or assistance to sustain their tenancy. As set out below, we carry out that assessment based on internal data, responsive reports, and formal assessment.
- 4.6 Some vulnerable adults are at risk of, or already experiencing, abuse or neglect; and as a result of their care and support needs, they are unable to protect themselves. In these cases, we have a safeguarding duty. We consider whether we have safeguarding duties whenever we assess a resident's vulnerability. As set out below, where safeguarding is identified as a specific factor, alongside this policy we address it through our Safeguarding Council Tenants and Leaseholders Policy and the Council's overarching Safeguarding Policy.
- 4.7 We are vigilant about child protection and take very seriously our statutory responsibility to keep children safe and to respond to any child protection concerns. We consider child protection whenever we consider a resident's vulnerability, but where it is identified as a specific factor, alongside this policy we address it through our Safeguarding Council Tenants and Leaseholders Policy and the Council's overarching Safeguarding Policy.

4.8 We use three key sources of information for identifying vulnerability and therefore understanding a resident's individual needs:

- Internal data held by the Council
- Responsive reports, and
- Formal assessment

4.9 These approaches are often linked. We may also use other ways of identifying how to help a vulnerable resident access services or sustain their tenancy.

Internal data held by the Council

4.10 The Council holds data from multiple sources of contact with our residents. To ensure we can support our vulnerable residents' tenancies and their access to housing management services as effectively as possible, we use data on people living in Council homes held by departments other than housing. We use our partnership with Policy in Practice to identify tenants facing financial pressures, and we aim to use data held by our Adult and Social Care services to alert us to housing-related needs. All the personal information about residents and service users that the Council hold is protected under the Data Protection Act 2018 and set out in our data protection policy.

4.11 When we become aware through such data that a tenant or resident leaseholder may need extra consideration or help from a housing perspective, we contact them to conduct a formal assessment of their requirements. However, when we are unable to reach that resident to carry out a formal assessment, we draw conclusions about the kinds of consideration and support they may need within guidelines set out in associated procedures.

Responsive reporting

4.12 There are four main ways in which we aim to become aware on a responsive basis that a resident is vulnerable or has a common indicator of vulnerability:

- The resident tells us
- A neighbour, family member or friend of the resident tells us
- A professional such as a GP, social worker, or support worker tells us
- Council officers or contractors identify that a resident may be vulnerable and informs us, generally through the Concern Card system.

4.13 We proactively encourage these means of alerting the Council's housing staff to concerns that a resident may need additional help – including whether there are child protection or adult safeguarding concerns. Ways of encouraging this include a standard paragraph inserted into all written communications to tenants, posters with contact details on estate noticeboards and in housing offices, articles and adverts in our residents' magazine Haringey People, professional networks and forums, staff training and communications.

4.14 We actively encourage contractors and officers from services across the Council to raise concerns about vulnerable tenants and leaseholders by using Concern Cards. Repairs and other staff using handheld devices are prompted to consider whether a Concern Card is necessary after each visit. We set out more detailed procedures in our Concern Card guidance.

4.15 When we become aware through any channel of responsive reporting that a tenant or resident leaseholder may need extra help from a housing perspective, we contact that resident to carry out a formal assessment of what exactly they need and want us to do. However, when we are unable to reach a resident to carry out a formal assessment, we draw conclusions about the kinds of consideration and support they may need within guidelines set out within associated procedures

Formal assessment

4.16 At key points, Council housing officers formally assess whether a tenant or resident leaseholder requires specific adaptations or priority to access housing services and if they need additional support or assistance to sustain their tenancy.

4.17 Those points include:

- Homelessness and housing register assessments
- During the allocations process
- At tenancy signings and during introductory visits
- During the 'Right to Buy' process
- At tenancy audit visits
- During conversations about arrears or other tenancy or leasehold management matters
- Whenever we are pursuing possession proceedings against a tenant, or forfeiture against a leaseholder, with a review of that assessment when we move from one stage of proceedings to another.
- Whenever we are investigating ASB or a hate crime
- Following identification of potential needs through data or responsive means

4.18 At pre-allocations stage, the focus of assessment is very different from the focus at allocation and during the tenancy. At pre-allocations stage, the focus responds to statutory requirements to assess, for example, our homelessness duty or an applicant's housing priority. However, we review those assessments at allocations and during early tenancy interactions to inform assessments of whether the tenant is vulnerable in terms of this policy.

- 4.19 At allocation and during the tenancy period, assessments focus on what exactly the vulnerable resident needs and wants us to do to help them access housing services and sustain their tenancy or lease. We carry out a specific assessment using a standard form appended to our assessment procedures.
- 4.20 We treat every resident as an individual when assessing vulnerability and determining the level of support they need; and we actively recognise that every individual is or could be linked with a complex community and network of others.
- 4.21 We include informal support within vulnerable residents' support networks. Support provided by friends, neighbours, family, unpaid carers and the community are all crucial to helping many vulnerable people access services and sustain their tenancies.
- 4.22 While assessments are underpinned by formal processes, the assessment process depends on the skill and sensitivity of the officer carrying it out.

5 Factors to consider alongside vulnerability

- 5.1 **Communication** is a key consideration when supporting vulnerable residents. However, not everybody with specific communications needs is vulnerable. Therefore, we carefully consider how to effectively communicate with every resident, whether they are vulnerable or not.
- 5.2 We aim to record whether any of our residents have specific communication needs, and the arrangements and adjustments that residents need us to make around those needs. We are committed to ensuring that individual communication needs are met to ensure that no resident is less able to access our services and sustain their tenancy. When English is not a resident's first language and their written or spoken English is a barrier to communication, we consider the Council's Translation and Interpretation Policy.
- 5.3 A small number of residents present a specific, identified **risk to other people**. That risk is very unlikely to be permanent, and where it remains a factor for a long time its nature and the management it requires will change. Some people who present a risk to others will themselves be vulnerable; others will not. As such, we record risk to others separately from information about vulnerability, along with the specific steps required to manage that risk.

- 5.4 We consider **mental capacity** when we assess a resident's vulnerability. A person lacks capacity when they are unable to make a decision for themselves regarding a specific matter. This could be due to an impairment of, or a disturbance in the functioning of, the mind or brain. A person must be assumed to have capacity unless it is established that they lack capacity; they must be provided as much support as possible to make a decision for themselves; and they have the right to make a decision even if others think it unwise. Assumptions of mental capacity should not be determined by age, appearance, or a condition or aspect of the individual's behaviour where unjustified assumptions can be made.
- 5.5 Where we believe that a tenant or leaseholder may lack mental capacity, we make a referral to Adult Social Care. Until a formal assessment has been made by Adult Social Care, we proceed as though the resident has capacity. However, where we cannot reach a resident, we will attempt within defined limits to draw conclusions about their communication needs from available information. These factors and considerations are set out in our procedures, and they are addressed in regular staff training and briefings.
- 5.6 Where a resident has been formally assessed by Adult Social Care services as lacking capacity to make decisions, we will work with their appointed representative to ensure that they can access housing services and sustain their tenancy.
- 5.7 Some vulnerable residents are at risk of, or already experiencing, abuse or neglect; and because of their care and support needs, they are unable to protect themselves. We are vigilant about such **adult safeguarding** concerns and take very seriously our statutory responsibility to prevent abuse and neglect of vulnerable people. We therefore consider safeguarding whenever we consider a resident's vulnerability. When we believe that there are safeguarding concerns, we refer to and address the risk of abuse or neglect through our Safeguarding Council Tenants and Leaseholders Policy and the Council's overarching Safeguarding Policy before considering making a referral to the Adult Safeguarding Team.
- 5.8 However, after making any such referral it remains our responsibility to provide support to that tenant or leaseholder within the scope of this policy to help them in the broadest sense sustain their tenancy and access our housing management services.

- 5.9 If a resident does not meet the threshold for adult care services, we aim to keep them safe by supporting them in line with this policy.
- 5.10 We are vigilant about child protection and take very seriously our statutory responsibility to keep children safe and to respond to any child protection concerns. All children and young people have the right to live in safety, without emotional cruelty, neglect, violence, or sexual abuse. We consider child protection whenever we consider a resident's vulnerability – but not only in that context. If a child is in immediate danger, we always phone 999. When we believe that there are child safeguarding concerns, we refer to our Safeguarding Council Tenants and Leaseholders Policy and then consider making a referral to Children's Services.
- 5.11 **Structural inequality** makes it more challenging for some people to achieve the outcomes they want and need. Along with class, factors recognised by the Equalities Act - age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation – all put individuals at greater risk of exclusion. We take these factors into account when considering whether somebody is vulnerable in terms of this policy – especially where there is an intersection of multiple protected characteristics, we know that individuals are statistically more likely to be subject to discrimination and exclusion. However, we never assume that somebody is vulnerable or has particular needs because they have a protected characteristic.

6 Communication

Communicating with vulnerable residents

- 6.1 We have a fundamental responsibility to communicate effectively with our residents. This includes a responsibility to try to establish what method and style of communication will work best for individuals and groups of residents.
- 6.2 Where a resident's ideal method of communication is not practical in the context of a housing management service, we work with them to reach agreement about appropriate arrangements that will work best for them. For example, we may not have capacity to guarantee that all phone calls will be made by a speaker of their first language, but we may be able to commit to speaking to a specific household member whose spoken English is more fluent and/or to writing with simple translations in place.
- 6.3 Communication is an especially important consideration when we are working with vulnerable residents. When we become aware that a resident is or may be vulnerable, we assess their communication needs as thoroughly as possible. In practice, this means we ask them how they would like us to communicate with them. However, where we cannot reach a resident, we will attempt within defined limits to draw conclusions about their communication needs from available information. Some of these factors and considerations are set out in the relevant procedures and they are addressed in regular staff training and briefings.

- 6.4 We separately record the arrangements and adjustments that any of our residents need us to make to communicate effectively with them. Where a resident – vulnerable or not - is identified as having specific communication needs, we note on the housing management landing page exactly what that communication or access need is, and how we will meet it. We are committed to ensuring that individual communication needs are met to ensure that no resident is less able to access our services and sustain their tenancy.

Communicating residents' vulnerability to contractors and external partners

- 6.5 We require all our contractors and agents to behave sensitively, respectfully, and responsively when visiting the home of every resident. Contractors and agents must be mindful every time they enter a resident's home that we all experience vulnerability at points during our lives.
- 6.6 These requirements are set out in greater detail in our contracts and Service Level Agreements with providers, and we regularly review these with our contractors and agents. The requirements form part of our procurement process, contractors and agents are selected and employed with them in mind.
- 6.7 When we arrange a repair, survey, gas safety check or any other home visit by or including an external contractor to a vulnerable resident, we provide very clear instructions about any specific requirements about how that visit should be carried out. This might include instructions about the time of the visit, the length of time it is likely to take somebody to open the door, the amount of notice required, the number of staff required for a visit, the means of communication required, or instructions about how to behave in the resident's home. The focus of our instructions is to outline our clear expectations about the behaviour of the contractor carrying out work on behalf of Haringey Council
- 6.8 On occasions of high risk, we may need to instruct contractors to make forced entry into a tenant or leaseholder's home or to enter in that resident's absence. Details about the decision-making process and conduct of such access are set out in the Access Policy. In these cases, we ensure that contractors and all partners involved are aware of any specific support needs that the resident has.
- 6.9 We share information with contractors and agents securely and in line with the Data Protection Act 2018 and set out in our data protection policy. Contractors are made aware of how we expect them to store and use resident data.
- 6.10 We will not share personal information about our residents except where they have given consent or when it is necessary to do so from a personal safety perspective. In those cases, we share only information that is directly useful, and only with people and organisations that will make use of it appropriately.

7 Signposting and referrals to other services

- 7.1 Where a vulnerable resident needs additional support from outside our housing management services to sustain their tenancy or access our services, we signpost or refer them to those external services.
- 7.2 We directly provide a range of services to support vulnerable Council tenants. We actively publicise, promote, refer and signpost these services to tenants.
- 7.3 These services include:
- A Food Box scheme for vulnerable tenants in financial crisis along with support to resolve those crises
 - Free career advice and support to help council tenants back into employment, training or further education
 - Access to financial advice and digital services, and Money Matters workshops about budgeting, saving, and borrowing
 - The Project 2020 'Off Road' hub in Northumberland Park offers engagement activities for young people three evenings a week, and during the half term holiday.
 - Social prescribing link workers
- 7.4 Before either signposting or making a referral, as part of our formal assessment we evaluate what kind and level of support service the individual resident needs.
- 7.5 Signposting is appropriate in most cases and can take place relatively quickly. This is the process of giving a client clear, accurate detail of organisations able to help them with specific issues. We check that the resident can contact those organisations directly: if so, it is normally left to the resident to arrange an appointment. In some cases, we help residents access signposted services by calling their behalf, particularly where the client has specific communication needs.
- 7.6 When we signpost a resident verbally, we confirm in writing with clear details about how to contact or visit the organisations in question. Depending on their preferred channel of communication, confirming in writing can be by texting, emailing, or messaging those details to the resident; or by sending details in the post.
- 7.7 Some services require a referral. A referral is a more detailed and lengthy process than signposting, generally requiring us to have more knowledge of the client and their issue. Ordinarily, making a referral means that we complete a referral form.
- 7.8 Except where a referral has been made in confidence or without consent, we provide the resident with a copy of any referral form along with written details of how to contact the agency.
- 7.9 We formally record all signposting and referrals on our housing management database.
- 7.10 We include informal support arrangements within vulnerable residents' support networks. Support provided by friends, neighbours, family, and the community are all crucial to helping many vulnerable people sustain their tenancies.

- 7.11 Whenever we are pursuing possession proceedings, we assess whether the resident is vulnerable within the meaning of this policy. If they are, we always aim to offer and put in place any external support or adaptations to services that are required. We review that assessment and those arrangements whenever we move from one stage of possession to another.
- 7.12 We publicise directories of external support services to residents including through our website, estate noticeboards, newsletters, and mail-outs.

8 Supporting vulnerable residents across our housing service

- 8.1 The commitments and principles set out in this policy run through and inform the provision of all aspects of our housing management services.
- 8.2 Vulnerable individuals need us to make different kinds of support and different adaptations to service provision in different contexts, so we focus on understanding an individual's needs in relation to individual service areas so that can fully access our housing management services and sustain their tenancy.
- 8.3 In each service area, we therefore refer to the policy relating to the service area in question alongside this policy.
- 8.4 The following service areas are of most relevance to vulnerable residents. However, if a service area is not included here, this does not mean that we do not consider vulnerability within its provision.

Lettings for vulnerable residents

- 8.5 The Council's Allocations Policy sets out how we allocate homes to those on the housing register. It includes provision for ensuring that vulnerable people are given reasonable preference.
- 8.6 We provide general and more specific information about the lettings scheme policies and procedures in a wide range of accessible formats.
- 8.7 Properties are advertised across a range of media, such as websites and print media, and at a range of locations including housing offices, libraries, and customer contact centres. We support access to computers and in making bids for people less familiar with computers and websites.
- 8.8 Our Lettings Policy sets out how we ensure our bidding, viewing, and tenancy sign-up processes are accessible for vulnerable people. We use the tenancy sign-up process to assess vulnerability.

Income collection and managing arrears for vulnerable residents

- 8.9 Assessing and responding to vulnerability is a core part of the income management process.
- 8.10 Providing help with money management, debt and rent arrears is a core part of our commitment to help vulnerable residents sustain their tenancies.
- 8.11 Our Housing Income Collection Policy, Housing Arrears Policy and procedures set out how we offer support and service adaptations for vulnerable residents at all stages of the income collection and arrears processes.

Anti-Social Behaviour and vulnerable residents

8.12 The Anti-Social Behaviour, Crime and Policing Act 2014 defines Anti-Social Behaviour (ASB) as:

- Conduct that has caused, or is likely to cause, harassment, alarm, or distress to any person; or
- Conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises; or
- Conduct capable of causing housing-related nuisance or annoyance to any person.

8.13 We recognise that ASB can disproportionately affect vulnerable people both in terms of its frequency and its impact.

8.14 We recognise that some vulnerable people can, intentionally or unintentionally, and in some cases partly as a result of specific vulnerabilities, behave in ways that cause harassment, alarm or distress, or housing-related nuisance or annoyance. We are clear that if the perpetrator is vulnerable, their vulnerability does not diminish the impact of their behaviour on others, nor does it take away their responsibility for it. Most vulnerable people – including those who misuse drugs or alcohol and those who have mental ill health - do not behave antisocially.

8.15 Our ASB policy sets out how we prevent and minimise instances of antisocial behaviour and we always refer to it when responding to ASB.

8.16 Our ASB Policy makes clear that we aim to strike a balance between protecting the quiet enjoyment of the community and helping individuals sustain their tenancy. To achieve this, we work with vulnerable residents – both victims and perpetrators - and partner agencies to provide a holistic and appropriate response to ASB.

8.17 Effective implementation of this Vulnerable Tenants and Leaseholders Policy is an important part of our commitment to reducing instances of ASB: identifying where our tenants and leaseholders need additional help contributes to preventing ASB from happening.

8.18 Our priority is always the wellbeing of the victim and reducing the harm ASB is causing. This focus does not in any way preclude providing effective support to a vulnerable perpetrator of ASB – in fact, such support is in many cases the most effective way of reducing the harm and protecting the wellbeing of the victim.

8.19 Whenever we respond to ASB we assess whether residents involved either as victim, witness, or alleged perpetrator are vulnerable within the terms of this policy.

Violence Against Women and Girls including Domestic Abuse

- 8.20 Violence Against Women and Girls (VAWG), which includes Domestic Abuse, is highly underreported but very common. Haringey Council has a zero-tolerance approach to VAWG. We are committed to supporting survivors, holding perpetrators to account, and working with our local communities to ensure all Haringey residents can live a life free from violence.
- 8.21 Our Domestic Abuse and Violence against Women and Girls Policy sets out how we will assist and support all residents and household members.
- 8.22 As a provider of housing services, we are well placed to recognise the signs of domestic abuse. We take all reports seriously and work positively with the victim to offer support.
- 8.23 Across housing services, we work hard to proactively identify and support people who have experienced domestic abuse, whether it's through our responsive repairs, tenancy and estate services, or our specialist service Hearthstone. This is some of the most important work that we do as it keeps women and children safe and well, and free from fear.

Preventing the eviction of vulnerable residents

- 8.24 We are committed to doing everything possible to prevent the eviction of vulnerable tenants. Our ASB and housing income collection policies set out how we will do this.
- 8.25 Whenever we are pursuing possession proceedings, we assess whether the resident is vulnerable. If they are, we actively put in place any support or adaptations to services that are required. We review that assessment and those arrangements whenever we move from one stage of possession to another.
- 8.26 Effective implementation of this Vulnerable Tenants and Leaseholders Policy is an important part of our commitment to preventing the eviction of vulnerable residents: identifying where our tenants and leaseholders need additional help, and providing that help as early as possible, contributes to preventing tenancy breakdown.

Treating damp and mould for vulnerable residents

- 8.27 We recognise that children and adults with certain health conditions are likely to be particularly susceptible to illness following exposure to any mould or damp. We therefore prioritise our response to damp and mould reports by certain vulnerable households.
- 8.28 Our damp, mould and condensation policy outlines how we will prioritise and support vulnerable households suffering from damp and mould in their homes.

Vulnerable residents and our repairs and maintenance services

- 8.29 Where a resident is at greater risk of harm because of their vulnerability in relation to disrepair or damage to their home – including to its communal parts such as lifts - we give them priority access to our repairs and maintenance services. Whenever a resident has a disability or limiting health condition, we consider with them a referral for an Occupational Therapy (OT) assessment to understand whether adaptations to the home are needed.
- 8.30 We proactively seek to make vulnerable residents aware of their priority access in relevant areas, and we publicise our schemes of prioritisation.
- 8.31 We support vulnerable tenants to access our repairs and maintenance services including by making reasonable adjustments to the ways in which we deliver those services.
- 8.32 We aim to use data insight to understand and target our repairs services, including in relation to vulnerable residents.
- 8.33 Our Responsive Repairs Policy sets out how we will support vulnerable households to access repairs as well as criteria for any priority and the operation of that priority status.

Aids and Adaptations

- 8.34 Whenever a resident has a disability or limiting health condition, we consider with them a referral for an Occupational Therapy (OT) assessment to understand whether adaptations to the home are needed.
- 8.35 Where an OT assessment recommends that a tenant requires minor adaptations such as a grab rail, stair rail, chair raise, or step alterations, we carry out that work directly.
- 8.36 Where an OT assessment recommends that a resident requires major adaptations such as a stairlift, ramp for a wheelchair, level access shower, we work with Social Care colleagues and surveyors to facilitate those adaptations.

Fire Safety for Vulnerable Residents

- 8.37 All Council blocks of flats that have either seven or more storeys or are at least 18 metres in height have an up-to-date Personal Evacuation Plan for all their vulnerable residents. Copies are provided to the local Fire and Rescue Service.
- 8.38 Our Fire Safety Policy is informed by our commitment to ensure that the needs of vulnerable residents are considered in detail to ensure that they are safe from fire in their homes including through consideration of additional assisted living smoke detection and telecare systems, the provision of fire safety information adapted to specific needs, and adaptations to evacuation routes.

Young care leavers and our corporate parenting duties

- 8.39 We have a unique responsibility as Corporate Parent to care leavers aged under 25. Under the Children and Social Work Act 2017 we have a statutory duty to act for those young people in the same way that a good parent would act for their child.
- 8.40 We have particular regard to our responsibilities under the Act to ensure that those young people have stability in their home lives; and that we act in the best interests of those young people, promoting their physical and mental health and wellbeing, ensuring they are safe.
- 8.41 We provide additional priority to care leavers on the housing register under an annual quota system.
- 8.42 We work closely with the Young Adults Service to provide a package of support to help care leavers prepare for the move to their new home and then sustain their tenancy. Details of this package are set out in our procedures.
- 8.43 We provide dedicated, named officers across key areas of the service to proactively keep in regular contact with the young person to support, mentor, and advise them. Detailed responsibilities for those officers are set out in our procedures.

- 8.44 If a young person is not coping during the first year of their tenancy, we give them the option to 'hand back' the tenancy without prejudice to their future housing options, and to be referred back for a new tenancy after working with their social worker and support partners to develop their independent living skills. Any homeless application that the young person makes will not find that they are intentionally homeless due to handing back that tenancy.
- 8.45 Where we have concerns around a young care leaver's tenancy or their wellbeing in their home, we make a referral to the Young Adult Service's Leaving Care Accommodation Panel (LCP) where we review care leavers' accommodation needs.
- 8.46 No young care leaver will be evicted or have their probationary tenancy terminated in the absence of a relevant housing Director approving that step after confirming that all aspects of this policy were followed, and adequate support services made available.
- 8.47 We invite care leavers to meet with managers and frontline housing staff to share their experiences of the service and take learning from those experiences that inform future service delivery.
- 8.48 We participate actively, as required, in the work of the Corporate Parent Advisory Committee and the delivery of responsive services for care leavers.
- 8.49 We monitor our performance against these commitments to make sure they are delivered.

Self-neglect and Hoarding

- 8.50 Self-neglect is an extreme lack of self-care likely to be characterised by:
- Lack of self-care to an extent that it threatens personal health and safety
 - Neglecting to care for one's personal hygiene, health or surroundings
 - Inability to avoid harm as a result of self-neglect
 - Failure to seek help or access services to meet health and social care needs
 - Inability or unwillingness to manage one's personal affairs
- 8.51 Hoarding is the excessive collection and retention of any material to the point that it impedes day to day functioning. A hoarding disorder is where someone acquires an excessive number of items and stores them in a chaotic manner, usually resulting in unmanageable amounts of clutter. The items can be of little or no monetary value.
- 8.52 Our hoarding policy sets out our approach to supporting residents who self-neglect and/or hoard and is based on risk management: we follow that policy in order to minimise the risk while respecting the individual's choices.

- 8.53 We provide specific training, supervision and support for staff dealing with people who hoard and self-neglect to help them understand the complexities of this area of work, the possibilities for intervention and the limitations.
- 8.54 We always make a Safeguarding Referral where we believe that a resident self-neglects or hoards and may have statutory care and support needs, and they are unable to protect themselves because of their care and support needs.
- 8.55 We aim to support the adult from a housing perspective as part of a coordinated interdisciplinary approach including shared risk assessment and management. Our role as housing professionals in such cases is likely to include tenancy sustainment support or the provision of repairs and maintenance services.
- 8.56 We resort to enforcement action only as a very last resort. We consider tenancy action and action under Environmental Health legislation in extreme circumstances but always with the aim of encouraging the individual to accept help and support.

Cuckooing

- 8.57 The experience of being “cuckooed” has a hugely negative impact on the vulnerable people victimised, who often experience violence, psychological distress, substance addiction, and being indebted to criminal networks as a result. Female victims have been known to disproportionately experience the additional torment of sexual coercion and assault. Cuckooing victims are predominantly older, male, and almost always have some form of underlying vulnerability. Victims will almost always live alone and often will have either, or a combination of, substance misuse needs, learning disabilities and mental health needs.
- 8.58 We do not seek to apportion blame to the victim: we view cuckooing as abuse. Like many forms of abuse, the relationship of the victim to the abuser can be complex.
- 8.59 Where we believe that a vulnerable adult covered by this policy has had their home taken over for criminal purposes, we always contact and work with the Police.
- 8.60 In partnership with the Police, we aim to provide support to the cuckooed resident so that they get the help they need; and to prevent people entering addresses which are being used for cuckooing using formal enforcement action such as injunctions or closure orders.

- 8.61 If the individual whose home has been taken has statutory care and support needs, we make an urgent Adult Safeguarding Referral, referring to our Safeguarding Adult Council Tenants and Leaseholders Policy.
- 8.62 We actively take a partnership approach including by referring the case to a Strategic Partnership Panel such as the Haringey MASP or MARAC.
- 8.63 We have a protocol in place with the Council's homelessness prevention services to ensure that in every case of cuckooing, we establish a partnership approach as early as possible.
- 8.64 Where a vulnerable resident covered by this policy has their home taken over for criminal purposes, our priority is that they are kept safe. This includes a commitment to ensure that victims of cuckooing are able to secure and sustain appropriate and safe accommodation – and to do so as quickly as possible.
- 8.65 We start from the principle that safety includes having a secure, safe, and sustainable home.
- 8.66 Where the vulnerable victim is a Council tenant, we are committed to ensuring that wherever possible they are able to retain their security of tenure. In many cases this will mean that we provide emergency or temporary accommodation, either keeping their existing tenancy until they can safely return to their home or ending that tenancy with no detriment and being urgently rehoused within the terms of the Housing Allocation Policy. In other cases, it may mean that we support the victim to end their tenancy consensually as part of a planned move to supported, sheltered or other more appropriate accommodation.
- 8.67 Where resident leaseholders are victims of cuckooing, we look to provide emergency or temporary accommodation until either they can safely return to their home, or they secure suitable alternative accommodation and sell their home.
- 8.68 Where private renters in Council leasehold properties are victims of cuckooing, we start from the assumption that their landlord has a duty to end the victim's tenancy as quickly as possible, and that as the responsible freeholder we ensure the leaseholder acts on that responsibility. Alongside that, we work in partnership with colleagues in homelessness prevention to ensure that the victim can secure appropriate alternative accommodation.

9 Links to other policies and strategies

9.1 We want the commitments and principles set out in this policy to run through all our housing management policies. All our housing management policies reviewed or produced after the adoption of this policy explain how we apply those commitments and principles to support vulnerable residents within each policy's service area.

Council policies that inform and relate to this policy include:

- [Housing Allocations policy](#)
- Housing arrears and write off policy
- Anti-Social Behaviour policy (in draft form)
- Housing Complaints policy (in draft form)
- Housing Compensation policy (in draft form)
- [Data Protection policy](#) (published)
- Equality and Diversity policy (can't find policy)
- Fire Safety policy (being drafted)
- Housing income collection policy (being drafted)
- Hoarding policy (being drafted)
- Information Management policy (can't find policy)
- Managing unreasonable behaviour or unacceptable consumer behaviour (in draft form)
- Reasonable adjustments policy (check status)
- Responsive Repairs policy (being drafted)
- Safeguarding policy (in draft form)
- [Translation and Interpretation policy](#)

Key strategies that inform and relate to this policy include:

- Haringey SEND strategy
- Haringey Adult Safeguarding Prevention Strategy
- Haringey's Young People at Risk Strategy
- Haringey Health and Wellbeing Strategy
- Haringey VAWG Strategy

10 Resident co-design and engagement

10.1 When did you discuss development of this policy with residents?

At meetings of the Resident Voice Board on 16 November 2023 and 15 February 2024.

10.2 What did they tell you?

Board members told us that the policy should identify:

- **The need to signpost to social prescribers and recognise the important role played by unpaid carers**

- **That poverty can make people vulnerable and people discharged from hospital can be vulnerable**
- **Confirm that leaseholders are included in the policy**
- **The importance of staff training on supporting vulnerable tenants and leaseholders**
- **A more proactive approach to identifying vulnerability**
- **Expand definition of sustaining tenancies to be more about a good life in tenancy**
- **Multidisciplinary working as central to delivering the policy**

10.3 How has what residents told us informed development of this policy?

- We have highlighted that social prescribing is one of the services that the Council actively publicise, promote, refer and signpost.
 - We include people discharged from hospital as one of the common indicators of vulnerability that our housing management function will assess.
 - We confirm that Council leaseholders are covered by this policy and the importance of staff training to support vulnerable tenants and leaseholders.
 - A more proactive approach to identifying vulnerability - We outline that at key points, Council housing officers formally assess whether a tenant or resident leaseholder requires specific adaptations or priority to access housing services and if they need additional support or assistance to sustain their tenancy.
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- We have expanded the definition of sustaining tenancies to be more about a good life in tenancy – The policy takes a holistic view of tenancy sustainment: supporting people to live well in the community is a key factor in preventing homelessness and is therefore a core housing management task for us.
 - Multidisciplinary working as central to delivering the policy - We work in partnership across the Council and with other organisations to provide wide ranging support to vulnerable residents at a local level that focuses on early intervention.
 - We outline that informal support within vulnerable residents' support networks are crucial to helping many vulnerable people access services and sustain their tenancies and highlight the key role played by unpaid carers as part of that network of support.
 - We state that vulnerability may arise from material conditions including poverty.

11 Equality Impact Assessment

11.1 Note whether an EQIA was carried out and a link to the assessment if so. Or summarise really quickly.

12 Reviewing the policy

12.1 We will review this policy every three years unless earlier events or legislation require an earlier update to this policy.

13 Legislation

13.1 As the landlord, we will ensure that we carry out this policy in accordance with best practice and statutory requirements as follows:

- Anti-Social Behaviour, Crime and Policing Act 2014
- Children and Social Work Act 2017
- Working Together 2023
- Data Protection Act 2018
- Equality Act 2010
- The London Safeguarding Children Procedures
- Human Rights Act 1998