

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	Vulnerable Adults' Housing Policy
<b>Date of assessment</b>	21 February 2022
<b>Directorate and Service</b>	Housing and Public Protection, Housing Services
<b>Manager</b>	Housing Development & Policy Manager
<b>Officer conducting assessment</b>	Housing Policy & Development Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<p>The Housing Service aims to ensure that everyone has the opportunity to access and benefit from its services, but realises that for some service users who are vulnerable, barriers may exist which may prevent participation.</p> <p>The objectives of the Vulnerable Adults' Housing Policy are to set out:</p> <ul style="list-style-type: none"> <li>• How vulnerable adults are identified</li> <li>• How vulnerable adults can access the Housing Service</li> <li>• How the Housing Service has adapted to meet the needs of vulnerable adults</li> <li>• The safeguards which are in place to protect vulnerable adults</li> <li>• How Housing Services staff will signpost and refer vulnerable adults to other organisations, when they require additional support.</li> </ul> <p>A review of the Vulnerable Adults' Housing Policy has been undertaken and this Customer Access Review has been carried out in conjunction with the review.</p>
<b>2. Who will be affected by the activity or proposal?</b>	The draft Vulnerable Adults' Housing Policy affects vulnerable housing service users, including Council tenants and leaseholders, housing and homelessness applicants, and occupants in the private housing sector.
<b>3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?</b>	<p>a) There are no key performance indicators specific to the Vulnerable Adults' Housing Policy, although the Housing Service will be introducing a new set of tenant satisfaction measures as part of its performance monitoring framework under the proposed new regulatory regime, as set out in the Government's Charter for Social Housing Residents (White Paper).</p> <p>b) The Vulnerable Adults' Housing Policy contributes to the Corporate Plan Housing and Stronger Communities strategic aim to 'facilitate quality, choice and diversity in the housing market, assist in meeting housing need in Dartford and deliver high quality services to service users'.</p>

# Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
<p><b>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</b></p>	<p>The Vulnerable Adults' Housing Policy is a discretionary policy. However, the Policy has regard to legislation such as the Mental Capacity Act 2005, Equality Act 2010, Care Act 2014, and UK GDPR and Data Protection Act 2018.</p> <p>In addition, the Regulator of Social Housing's Tenant Involvement and Empowerment Standard 2017 states that registered providers shall demonstrate how they respond to tenants' needs in the way they provide services and communicate with tenants.</p> <p>The Policy defines a vulnerable adult as 'anyone aged 18 or above or aged 16/17 with a guarantor; who may be in need of community care services or an enhanced housing service'. The Policy is not bound by legislation and because of this the above general definition of 'vulnerability' has been adopted which is used broadly across all Housing Service areas, for the purpose of identifying service users who may require a tailored or enhanced housing service (such as extra visits or correspondence in braille) or who require signposting or referring to other services. The Policy recognises that the Housing Service will also use statutory definitions of vulnerability in carrying out its functions, for example, the homelessness legislation definition of vulnerability. The Policy definition does not replace statutory definitions.</p>
Step 2: Information collection	
<p><b>5. What do you know about the groups of people who will be affected?</b> (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p>	<p>Vulnerable adults are identified in a number of ways by the Housing Service, as outlined in the Vulnerable Adults' Policy, as follows:</p> <ul style="list-style-type: none"> <li>• Vulnerability checklist which is part of application forms for example, the Council's housing register, homelessness prevention form, disabled facility grants and private sector leasing scheme</li> <li>• During the initial tenancy sign-up or during other home visits</li> <li>• Over the phone</li> <li>• Notification from relatives, neighbours or friends</li> <li>• During daily calls or weekly visits for Housing Scheme tenants</li> <li>• Housing support concern card. If a repairs or gas servicing contractor has concerns that someone may require some extra support or there are safeguarding concerns, they fill out a 'concern card' and then return it to the Housing Officer. The Housing Officer then contacts the tenant to resolve any unmet need</li> <li>• Notification from professionals, such as Occupational Therapists, Care Managers, or GP's</li> </ul>

# Customer Access Review – Full Assessment

<p><b>Step 2: Information collection</b></p>	
	<p>When a service user is identified as vulnerable (according to the Housing Services definition) by a member of staff, they will record the nature of the vulnerability; how the service user has been assisted e.g. ‘referral for Adult Social Care’; and any other agencies working with the service user. Demographic information in relation to the protected characteristic groups is also collected by the various departments within the Housing Service, for example during the tenancy sign-up.</p>
<p><b>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b></p>	<p><b><u>INTERNAL CONSULTATION - HOUSING SERVICE</u></b></p> <p>Internal consultation has been undertaken within the Housing Service to review the support offered to vulnerable service users and to plan accordingly with the aim to update the Vulnerable Adults’ Housing Policy in response to the review findings. From the review, updates have been made to the Policy on ways the Housing Service is providing support to vulnerable service users which have been set up since the Policy was last published. For example, the Policy has now been updated to explain joint working initiatives set up to resolve housing issues that can affect vulnerable service users, including the Housing Inclusion Service, Housing Hub and Complex Case Panel.</p> <p>Under the review, new ways of working have also been suggested that will need to be explored further and approved to take forward before their inclusion in the Policy. For example, Council properties are let to certain minimum standards of condition (‘void standard’) and the condition of the decoration will vary by property. In terms of assistance with regards to decoration and small DIY tasks, aside from decorating vouchers (which are available to any tenant if the condition of the property meets the criteria), the Older Person’s Decoration and Handyman Schemes offered, focus towards supporting older and disabled tenants. There is recognition that there may be a gap in the support provided to other vulnerable groups, particularly recognising and supporting younger vulnerable tenants who are not eligible for these schemes and may find it difficult carrying out the works themselves if they have no support networks to assist them – for example, care leavers. The review recommends to <b><i>explore the feasibility of introducing an enhanced void standard offer for vulnerable tenants; and, to review how the repairs and maintenance service interacts with and tailors the service for younger vulnerable tenants.</i></b></p> <p>In tandem with the review of the support offered to vulnerable service users, there has been internal consultation within the Housing Service on the ways it can work with residents, community groups, voluntary bodies and statutory agencies to help to tackle loneliness. Loneliness has undoubtedly been exacerbated by Covid-19 and the Government’s White Paper expressed that it is keen to ensure that loneliness is tackled and that social housing landlords focus on engaging with and supporting their most vulnerable residents. While older adults have been the focus of most of the research around loneliness, it can affect anyone of any age and background. Loneliness does not discriminate and you do not have to be a vulnerable person or</p>

# Customer Access Review – Full Assessment

<b>Step 2: Information collection</b>	
	<p>belong to a particular protected characteristic group to experience loneliness – although it is acknowledged a person’s vulnerability may increase the risk for some. The review makes recommendations on the ways the Housing Service can assist to address loneliness and updates have been made to the draft Vulnerable Adults’ Housing Policy to explain that the Housing Service will aim to help to tackle loneliness by ensuring that staff are aware of the issues of loneliness; how to identify a service user is experiencing loneliness; and where to signpost the service user for support.</p> <p><b><u>DARTFORD TENANTS’ AND LEASEHOLDERS’ FORUM</u></b></p> <p>The Dartford Tenants’ and Leaseholders’ Forum (DTLF) were invited to comment on the draft Vulnerable Adults’ Housing Policy. The DTLF aims 'to ensure that the services delivered by the Council are accessible to all'. The Forum works as a group to ensure that the views and housing needs of residents are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery. There were no equality issues raised regarding the draft Policy from the consultation.</p>
<p><b>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</b></p>	<p><b><u>VULNERABLE SERVICE USERS</u></b></p> <p>Understanding the ‘lived experiences’ that vulnerable service users themselves have when accessing the Housing Service will assist in measuring the impact of the Vulnerable Adults’ Housing Policy and identify any gaps or areas of improvement within the service. The Housing Service is currently reviewing the ways it seeks the views of service users, how it communicates with residents, and how it measures satisfaction to inform a new strategy for resident engagement. It is recommended that <b><i>the review of resident engagement should consider how to reach vulnerable service users for their feedback so that any improvements and/or changes to services provided, are reflected in future updates to the Vulnerable Adults’ Housing Policy where appropriate.</i></b></p>
<b>Step 3: Assessing the equality impact</b>	
<p><b>8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:</b></p> <p>a) tackling unlawful discrimination  b) promoting equality of opportunity  c) promoting good relations</p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> <li>The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration</li> </ul>	

# Customer Access Review – Full Assessment

## Step 3: Assessing the equality impact

- For existing activities, consider how they are working in practice for each relevant protected group
- For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group
- If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9
- If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9

## Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
<b>Age</b>	Section 4 of the Vulnerable Adults' Housing Policy explains the support provided to service users, to which age may be a factor in their vulnerability.	As highlighted under question 6 - there may be a gap in the support provided to other vulnerable groups with regards to repairs and maintenance, particularly recognising and supporting younger vulnerable tenants who are not eligible for the Older Persons Decoration and Handyman Schemes and may find it difficult carrying out decoration or small DIY works themselves if they have no support networks to assist them.	<input type="checkbox"/>	<input type="checkbox"/>
<b>Disability</b>	<p>Section 4 of the Vulnerable Adults' Housing Policy explains the support provided to service users, to which disability may be a factor in their vulnerability, including physical disability, illness, mental health problems, learning disabilities, sensory impairments.</p> <p>Where it is identified that a service user does not have the mental capacity to make decisions for themselves, the Housing Service will work with carers, advocates and legal representatives of the service users to ensure they are able to access the services they need in line with the Mental Capacity Act 2005.</p>		<input type="checkbox"/>	<input type="checkbox"/>

# Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	The Vulnerable Adults' Housing Policy recognises that where a person has a sensory impairment, this may be a factor in a person's vulnerability. In accordance with the Council's Equality & Diversity Document Framework, information can be provided in alternative formats, including: Braille, audio tape and large print versions of documents. British Sign Language interpreting services can be provided upon request. Calls can also be received via Relay UK.			
<b>Sex</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Gender reassignment</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Race</b>	The Vulnerable Adults' Housing Policy recognises that where English is not spoken, or spoken only as a second language, this may be a factor in a person's vulnerability. In accordance with the Council's Equality & Diversity Document Framework, information can be provided in alternative formats, including: documents translated into other languages. Telephone and face-to-face language interpreting can be provided upon request.		<input type="checkbox"/>	<input type="checkbox"/>
<b>Religion/Belief</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sexual Orientation</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy/Maternity</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership*</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>

# Customer Access Review – Full Assessment

\* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

Step 3: Assessing the equality impact	
<p><b>9. If ‘no impact’ or ‘unknown’ was selected, please explain</b></p>	<p>There are no known circumstances where the Vulnerable Adults’ Housing Policy will have a negative equality impact on a particular group. The aim of the Policy is to ensure that everyone has equality of opportunity to access and benefit from the Housing Services. The Policy should have a positive impact on service users by raising awareness and understanding of types of responses and support provided to vulnerable service users.</p>
<p><b>10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups</b></p>	<p>The Vulnerable Adults’ Housing Policy sets out that the Council will signpost and refer vulnerable adults to appropriate support services if it is needed. Some of the services signposted or referred to may include:</p> <ul style="list-style-type: none"> <li>• GPs and health services</li> <li>• Mental health services</li> <li>• Adult Social Services (for care and support services)</li> <li>• Housing-related support (for Housing Scheme tenants)</li> <li>• Occupational Health</li> <li>• Substance misuse services</li> <li>• Domestic abuse services</li> <li>• Debt advice and welfare benefit services</li> <li>• Advocacy services</li> </ul> <p>The Policy also recognises that carers, who are caring for vulnerable people in a voluntary capacity (e.g. partner, relative or friend), may also need support in fulfilling their responsibilities and in looking after their own wellbeing. Carer’s will be signposted, wherever appropriate, for carer’s assessments and/or to other carer’s support.</p> <p>The Housing Service will also make referrals to Social Services where there is a concern that a vulnerable adult is at risk of or experiencing abuse and/or neglect.</p>

# Customer Access Review – Full Assessment

<b>Step 3: Assessing the equality impact</b>	
	<p>There are no known circumstances where these partnership working arrangements will have a disproportionate impact on the protected characteristic groups other than to positively improve the service provided to service users and ensure their needs are met. Effective communication with partnerships will ensure the correct support is provided through information sharing.</p>
<b>11. Any other comments</b>	<p>The Vulnerable Adults' Housing Policy is relevant to the Equality Act 2010 aims to eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act; and to advance equality of opportunity between persons who share a protected characteristic and those who do not.</p> <p>The Vulnerable Adults' Housing Policy states that any service user who is not satisfied with the service they have received or who believes they have been discriminated against can make a formal complaint to the Council using the corporate complaints process.</p>

<b>Step 4: Action plan</b>
<p><b>12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:</b></p> <p>a) any gaps in information and consultation  b) how any negative impacts on equality will be mitigated or eradicated</p>
<p>a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?</p>

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views of vulnerable service users on their experiences of accessing the Housing	The review of resident engagement will inform a resident engagement strategy.	Feedback will inform any improvements and/or changes to services provided to	September 2022	Through developing new feedback mechanisms for vulnerable service	Resident Involvement Officer / Housing Policy & Development Officer



## Customer Access Review – Full Assessment

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Service and the support available	This will consider how to reach vulnerable service users for their views on the Housing Service and how they are supported	support vulnerable service users, which will be reflected in future updates to the Vulnerable Adults' Housing Policy and a strategy for resident engagement		users under the new resident engagement strategy to be developed	

**b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?**

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
There may be a gap in the assistance with decoration and small DIY tasks for some groups of vulnerable tenants, particularly recognising and supporting younger vulnerable tenants	Explore the feasibility of introducing an enhanced void standard offer for vulnerable tenants	Vulnerable tenants will have the best possible start in their tenancy and new home	May 2022	Tenant feedback mechanisms and performance data	Housing Maintenance Manager
There may be a gap in the assistance with decoration and small DIY tasks for some groups of vulnerable tenants, particularly recognising and supporting younger vulnerable tenants	Review how the repairs and maintenance service interacts with and tailors the service for younger vulnerable tenants	Younger vulnerable tenants will have the best possible start in their tenancy and new home	May 2022	Tenant feedback mechanisms and performance data	Housing Maintenance Manager

## Customer Access Review – Full Assessment

<b>Step 5: Decision making and future monitoring</b>	
<b>13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?</b>	Director of Housing and Public Protection
<b>14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>15. How will you continue to monitor the activity or proposal on protected characteristic groups?</b>	Through developing new feedback mechanisms for vulnerable service users.
<b>16. When will you review this Customer Access Review?</b>	New assessments will be undertaken every three years in conjunction with the review of the policy, or sooner, in the event of major legislative or operational changes.
<b>Step 6: Final steps</b>	
<b>17. Once this Customer Access Review has been approved, send this assessment to the Policy &amp; Projects Officer</b>	
<b>18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded</b>	