

1 Introduction

- 1.1 Stockport Homes' approach to customer vulnerability is consistent with relevant legislation, regulation, and best practice.
- 1.2 The purpose of this policy is to provide clear guidance for [customers](#) and colleagues around recognising and recording customer vulnerabilities and making reasonable adjustments.
- 1.3 Delivering reasonable adjustments to services for customers with vulnerabilities is an essential part of achieving Stockport Homes' Mission: Transforming Lives and its Aim: to deliver excellent customer service driven by customer feedback and experience.
- 1.4 [Stockport Homes](#) regularly measures how satisfied customers are with all its services. Performance is closely monitored by Stockport Homes' Leadership Team and Board so that improvements can be made when needed.

2 Scope

- 2.1 This policy applies to all Stockport Homes' [customers](#) regardless of relationship, e.g. [tenants](#), leaseholders, [Carecall](#).
- 2.2 The policy sets out Stockport Homes' general approach. However, it will consider decisions on a case-by-case basis and make exceptions where it appropriate and reasonable to do so. Customers and colleagues should feel comfortable asking us to do things differently where this meets a particular need.

3 Definitions

- 3.1 **Stockport Homes** - for the purposes of this policy, Stockport Homes describes all Stockport Homes Group companies unless otherwise stated.
- 3.2 **Customer** – describes a person that buys or receives goods or services from Stockport Homes and/or has a contractual relationship with Stockport Homes/Stockport Council including [tenants](#), [household members](#), leaseholders, shared owners, licence holders and/or service users.
- 3.3 **Tenant** – describes both sole and joint tenants with whom Stockport Homes/Stockport Council have a contractual relationship, e.g. via a Tenancy agreement.
- 3.4 **Household member** – describes people who live with a [tenants](#), leaseholder, shared owner or licence holder.

4 Stockport Homes' Policy

4.1 **Stockport Homes** aims to use every opportunity to better understand and record **customers'** diverse needs including those arising from protected characteristics, language barriers, and additional support needs.

4.2 **Stockport Homes** will use data held to continually adapt and evolve its communication and landlord services to better meet those needs and ensure that **tenants** have fair access to, and equitable outcomes of, housing and landlord services.

4.3 Stockport Homes will:

- Use information and observation to understand if a customer is vulnerable
- Record vulnerabilities on customer records and keep this up to date
- Investigate gaps in vulnerable customers accessing services, e.g. are disabled customers accessing repairs services as frequently as non-disabled customers?
- Allow customers and prospective customers to be supported by a representative or advocate in interactions about landlord services
- Record information on other agencies that support vulnerable customers and/or people who have delegated authority or Power of Attorney to act on behalf of customers
- Ensure communication with, and information for customers is clear, accessible, relevant, timely, appropriate and sensitively delivered
- Ensure services are accessible and the ways to access these are advertised to customers including supporting how to use online landlord services if required, e.g. Homechoice bidding service
- Expect colleagues to check records for information about customer vulnerabilities at each contact point and adapt their approach as needed.
- Expect all colleagues and contractors visiting customers at home to ask if there is anything they need to know or can do to help the visit run smoothly
- Give customers opportunities to tell us how accessible our services are so we can learn and improve
- Make 'reasonable adjustments' to how services are delivered as needed
- Train and empower colleagues to:
 - a. request adjustments to help meet customer needs.
 - b. help customers to access services

4.4 **Customers** will inform Stockport Homes:

- If they or any relevant member of **household** becomes disabled and/or vulnerable
- If support or flexibility is needed to access services including when booking repairs or home visits.

5 Recognising Vulnerability

5.1 **Customers** may be vulnerable for all sorts of reasons. Stockport Homes, like the Housing Ombudsman, defines 'vulnerable' as:

- **“Characteristics that a customer possesses**, either permanently or temporarily, **that may mean they need care or support to complete landlord-tenant transactions** – e.g., paying their rent, opening the door to allow a gas safety check.

5.2 There is no legally agreed definition of a vulnerable **customer**. Vulnerability is often linked to 'protected characteristics' (Equality Act 2010). The protected characteristics are:

- Age
- Disability
- Gender re-assignment
- Marriage & civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

5.3 Many of us will be vulnerable at times, e.g., during illness or bereavement, when suffering mental health issues, domestic violence or money worries. Recognising when customers are vulnerable gives Stockport Homes the best chance to help and support them.

6 Recording Vulnerability

6.1 Recording customer vulnerabilities on the Housing Management System (CX) gives colleagues the best opportunity to deliver services and support customers in the most appropriate way.

6.2 All Stockport Homes' colleagues are responsible for recognising vulnerabilities and ensuring that they are recorded on the Housing Management System. Teams have Customer Alert Champions who can advise colleagues and input alerts onto the Housing Management System.

6.3 Several teams will proactively identify and record vulnerabilities on the Housing Management System. These teams will receive additional training to recognise and record vulnerabilities and include:

- Customer Feedback Team when working with complainants
- Colleagues working on tenancy sign-ups
- Neighbourhood Housing and Independent Living Teams when carrying out Tenancy Reviews, Visits and other Contacts

- Customer Finance Team when starting legal action
- Safer Neighbourhood Team when starting legal action on Anti-Social Behaviour cases
- Housing Support when delivering support services.

6.4 Stockport Homes will collect data on the following in addition to personal data (age, ethnicity, sex, sexuality):

- Physical, hearing, speech and visual impairment
- Care leaver under 25
- Mental illness, e.g., bipolar disorder, depression etc.
- Neurodiversity, e.g. autism, ADHD, etc.
- Chronic, debilitating health condition, e.g., heart and/or liver condition.
- Breathing difficulties e.g. bronchitis, COPD, asthma
- Neurological conditions that effect independent living, e.g., dementia, Alzheimer's etc.
- Recent experience of domestic violence
- Support worker in place
- Interpreter required.

7 'Reasonable Adjustments' and Service Delivery

7.1 Stockport Homes will consider how to reasonably adjust services in relation to customers' specific circumstances. Examples of reasonable adjustments that may be made include:

- Sensitively deciding if vulnerable customer/s should be visited in person rather than using the telephone
- Explaining written information in person or over the telephone if customers have visual impairment or literacy issues
- Using the interpreter and translation service if someone does not speak English as a first language.
- Offering to send a same sex colleague and/or visiting in mixed sex pairs if a customer has been the victim of domestic violence.
- Offering addition support or flexibility of service to neurodiverse people e.g., prearranged appointments and flexible times for repairs
- Asking a support worker from another agency to provide support around difficult issues, e.g., rent arrears.

7.2 If colleagues are unsure about any aspect of recognising, recording, or making reasonable adjustments they should discuss with their manager.

8 Data Protection

8.1 **Stockport Homes** holds personal information about **customers** to allow the supply of a range of services. Stockport Homes also collects sensitive information known as special category data. This information is treated with added care due to its sensitivity.

8.2 Stockport Homes' Information Governance Policy ensures that there are guidelines and processes in place to collect data and deliver services effectively, whilst complying with relevant legislation and best practice including:

- UK General Data Protection Regulation
- Data Protection Act 2018
- Freedom of Information Act 2000
- Environmental Impact Regulations 2004
- Law Enforcement Directive 2016 [(EU) 2016/680]
- Privacy and Electronic Communications Regulation 2003.

8.3 If customers are unsure about the information being recorded by Stockport Homes, they should contact assurance@stockporthomes.org.

8.4 If colleagues are unsure about what information to record and the legal basis for doing so, they should ask their manager and/or contact assurance@stockporthomes.org.

9 Accessibility

9.1 The Stockport Homes website includes the Recite Me assistive technology tool that enables customers to customise their experience in a way that best suits their individual needs. This includes larger font, translation into another language, audio etc.

9.2 Please open the Recite Me assistive tool by choosing 'Accessibility' from the toolbar at the top of the webpage and then choose the policy you wish to access from the list on the website.

10 Get Involved

10.1 Stockport Homes consults [customers](#) regularly about policy content, service standards and value for money. If customers would like to get involved, discuss this policy, help make decisions, make a complaint, or leave a compliment, please [contact us](#).

11 Contact Us

11.1 Customers can contact us by ringing 0161 217 6016, visiting our website <https://www.stockporthomes.org/do-it-online/tell-us/contact-us/> or visiting our head office at Cornerstone, 1-3 Edward Street, Stockport, SK1 3NQ.

11.2 Stockport Homes can also be found on [Facebook](#), [Instagram](#) and [Twitter](#).

11.3 If customers are unhappy with the service received from Stockport Homes, please see get in touch by:



Vulnerability Policy

- Completing an online form - <https://www.stockporthomes.org/about-us/our-performance/complaints/#ComplaintForm>.
- Emailing feedback@stockporthomes.org
- Telephoning 0161 474 2600
- Reporting a complaint to any member of Stockport Homes staff.



12 Internal Controls

1	Version control Version number will change every three years or at major review	
	Version No.	Date
	1	
	Change/s and reasons for change	
	Creation of new policy following a review of all customer policies and gap analysis against the Regulator of Social Housing Consumer Regulations and the Housing Ombudsman Spotlight Report: Relationship of Equals.	

2	Policy Owner i.e. Director	Director of Customer Services
	Policy Author/s i.e. Head of Service	Head of Customer Access
	Consultation	Customer Focus Committee – 20 th May 2024 - Presentation on Stockport Homes’ approach to customer vulnerabilities.
	Approved by/date Directorate Management Meeting	ELT – 1 st October 2024
	Communication	Customer Newsletter – February 2025 Team Meeting Slides – February 2025 Colleague Insight – February 2025
	Effective Date - the date of sign-off	2 nd October 2024
	Next Full Review Date i.e. 3 years after effective date, with an annual light touch review	1 st October 2027

3	Regulatory Standards	Please list the Consumer, Governance, Viability standards and outcomes this policy meets
	Standard/s	Required outcome
	Transparency, Influence and Accountability Standard	Registered providers must communicate with tenants and supply information so tenants can use landlord services, understand what to expect from their landlord, and hold their landlord to account. <u>1.1 Fairness and respect</u> 1.1.1 Registered providers must treat tenants ¹ and prospective tenants with fairness and respect.

	<p><u>1.2 Diverse needs</u></p> <p>1.2.1 In relation to the housing and landlord services they provide, registered providers must take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants.</p> <p><u>1.3 Engagement with tenants</u></p> <p>1.3.1 Registered providers must take tenants' views into account in their decision making about how landlord services are delivered and communicate how tenants' views have been considered.</p> <p><u>1.4 Information about landlord services</u></p> <p>1.4.1 Registered providers must communicate with tenants and provide information so tenants can use landlord services, understand what to expect from their landlord, and hold their landlord to account.</p>
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4	Linked policies	
		<p>This policy links to all customer facing policies.</p> <p>Information Governance Policy</p> <p>Equality, Diversity and Inclusion Policy (to be published)</p>

5	Equality, diversity and inclusion	<p>Describe how different experiences, characteristics, and approaches were considered during the formulation of the policy, e.g. neurodiversity, age, religion, sex/gender, financial/digital inclusion.</p>
		<p>By recording customer disability / vulnerability information, Stockport Homes can use the data to continually adapt and evolve its communication and landlord services to better meet those needs and ensure that tenants have fair access to, and equitable outcomes of, housing and landlord services.</p>

6	Risk management	<p>This policy helps to mitigate the following risks identified on the Corporate Risk Register</p>
	Corporate Risk 1	Stockport Homes is not adequately prepared for a proactive inspection of the Consumer Standards by the Regulator of Social Housing
	Corporate Risk 2	Stockport Homes does not maintain a strong, positive reputation where stakeholders have trust and confidence in Stockport Homes
	Corporate Risk 6	Stockport Homes does not deliver excellent customer services in the way that customers require them
	Corporate Risk 7	Stockport Homes does not respond to and learn from complaints effectively and does not listen to the customer voice

7	Performance monitoring	Please list any financial and/or performance measures related to this policy including Government return performance measures (TSM (Tenant Satisfaction Measures)), corporate or directorate performance indicators etc.
		<p>TSM Satisfaction: TP01 - Overall satisfaction. TP02 - Satisfaction with repairs. TP03 - Satisfaction with time taken to complete most recent repair. TP06 - Satisfaction that the landlord listens to tenant views and acts upon them. TP07 - Satisfaction that the landlord keeps tenants informed about things that matter to them. TP08 - Agreement that the landlord treats tenants fairly and with respect. TP10 - Proportion of residents with communal area who report that they are satisfied that their landlord keeps communal areas clean and well maintained</p> <p>Stockport Homes annually reports and publishes information about the work done to deliver on equality, diversity and inclusion commitments, and progress made via updates to senior management team and Board. The information includes:</p> <ul style="list-style-type: none"> • Anonymised analysis of customer profile information across protected characteristics and vulnerability data in key service areas – housing register, lettings, tenants, money advice service users, homelessness cases, customer feedback • A breakdown of performance of the TSM's TP01 to TP12 against protected characteristics and vulnerability data.