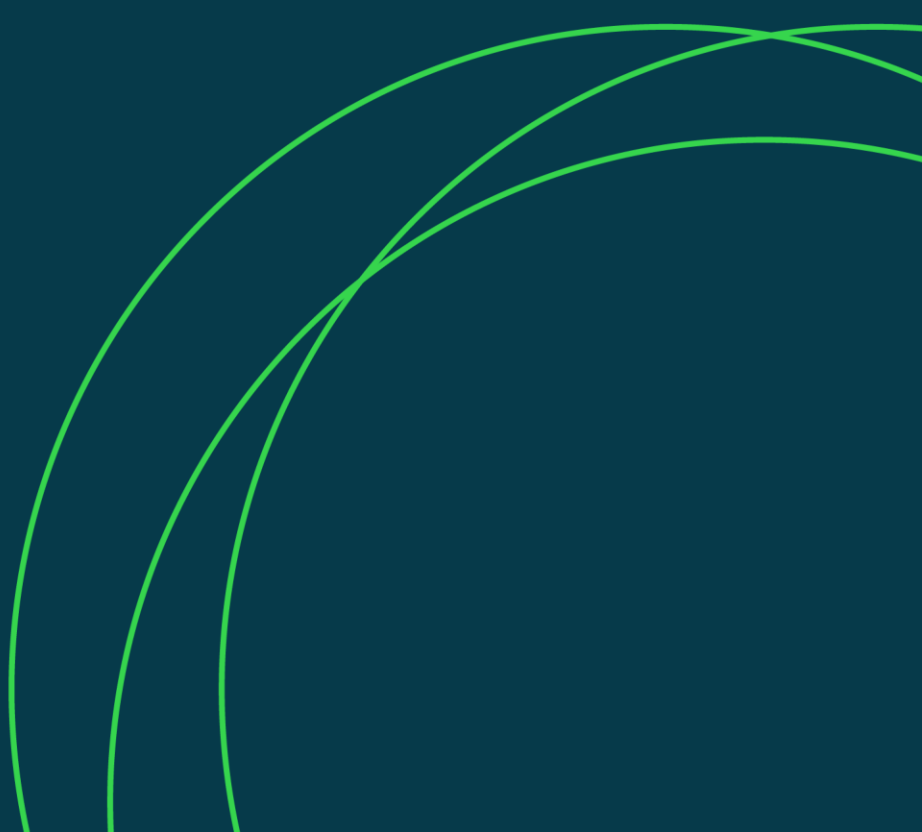




Sparrow
Shared Ownership

Vulnerable Customers Policy

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VERSION: 1.0
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REVIEW: November 2027
AUTHOR(S): Homeowner Services Manager



Vulnerable Customers Policy

1. Our policy statement

- 1.1. This policy sets out Sparrow Shared Ownership Limited's (Sparrow) commitment to assisting vulnerable customers, including household members, in accessing our services and to make sure they receive the assistance they need to manage their lease and responsibilities. It aims to ensure that all customers have equal access to Sparrow's services and that we identify, understand, and respond to their needs, supporting them to thrive in their homes and communities.
- 1.2. Sparrow identifies a vulnerable customer as "any person who is experiencing temporary or permanent difficulties with everyday living and/or is in need of additional support services or currently unable to act independently and/or are unable to cope with managing their tenancy without additional support". For possible factors defining vulnerability please see Appendix A.
- 1.3. A customer's vulnerability may be identified by:
 - the customer, when applying for housing, if they contact us or self-refer;
 - any member of Sparrow staff who has contact with the customer in person, on the phone or through any other channel of communication;
 - our contractors or partners;
 - a referral from an external agency or organisation;
- 1.4. We recognise that some customers will have a degree of vulnerability that may impact how they are able to manage their home and that a customer can become vulnerable at any point during their time in a Sparrow home. In responding to customer enquiries staff may enquire about their needs, and customers are encouraged to state their needs whenever possible. As such, every customer contact with Sparrow is an opportunity to identify whether they are vulnerable and in need of additional support.
- 1.5. This policy focuses on customers who are vulnerable but have capacity to make their own decisions. Where a customer has been assessed as lacking or believed to lack capacity, we will work with their care authority appointed person(s) or authorised representatives.
- 1.6. Every customer will be treated as an individual when we assess their circumstances in determining the level of support required. We will not assume whole groups of people are vulnerable. We acknowledge that having a disability does not necessarily mean a customer is vulnerable and not all our customers with vulnerable needs have a disability.
- 1.7. When a customer is identified as someone in need of additional support, either at the beginning or any other point during their time in a Sparrow home, our staff will seek to signpost or refer them to any appropriate support agencies that may be able to assist. We will make reasonable adjustments to help the customer to use our services in a way that suits their circumstances and communicate with them in a manner that factors in any accessibility issues.
- 1.8. We will make safeguarding referrals whenever needed.

- 1.9. As a responsible Landlord, we take account of known vulnerability factors in the provision of services and in decisions around tenancy management and enforcement.
- 1.10. Sparrow will consider any additional needs due to the vulnerability and where appropriate vary our service delivery to ensure vulnerable residents still receive the same level of service.
- 1.11. A reasonable adjustment is a legal term defined by the Equality Act 2010. Its purpose is to make sure all our services can be equally accessed by customers with vulnerabilities and those without. Examples of reasonable adjustments include (but are not limited to):
 - A physical alteration to one of our homes (e.g. adapting a bathroom or installing handrails);
 - An adjustment to how we communicate (e.g. providing information in alternative formats).
- 1.12. The type of additional assistance or adjustments provided will depend on the level of vulnerability and the specific circumstances of the customer. Additional assistance may be provided by Sparrow staff directly, third parties acting on our behalf, or via referral to external agencies.
- 1.13. All records regarding vulnerable customers including all communication and attempted contacts, offers of support and referrals will be recorded securely on our housing management system.
- 1.14. We will also record information where there's anyone with delegated authority to speak to us on the customer's behalf. This is to make sure that our staff have advanced knowledge of any additional factors to consider when delivering services. If there are support agencies working with the customer that they can liaise with to resolve any housing issues. We will review this data regularly to make sure it is accurate and up to date.
- 1.15. We will review our records regarding vulnerable customers as part of our periodic tenancy reviews and customer interactions.
- 1.16. This policy has been developed in line with:
 - Human Rights Act 1998
 - Equality Act 2010
 - The Care Act 2014
 - Data Protection Act 2018
 - UK GDPR
 - Mental Capacity Act 2005
 - The RSH Consumer Standards
 - Housing Ombudsman Complaint Handling Code 2024.

2. The scope of this policy

- 2.1. This policy applies to all Sparrow's shared owner and leasehold customers.

3. Equality and diversity

- 3.1. Sparrow is committed to making sure all services are accessible to all our customers. Our staff will be trained to make sure they are communicating appropriately with our customers, and they have the relevant information.
- 3.2. This policy will be applied in a way which makes sure we treat all customers with fairness and respect. We recognise our duty to advance equality of opportunity and prevent discrimination or victimisation on the grounds of age, sex, sexual orientation, disability, race, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and any other protected characteristic defined within the Equality Act 2010.
- 3.3. On request we will provide translations of all our documents, policies and procedures in various languages and formats including braille and large print.

4. Delivery of this policy

- 4.1. This policy should be read alongside:
 - Antisocial Behaviour Policy
 - Domestic Abuse Policy
 - Safeguarding Children, Young Persons and Adults Policy.
- 4.2. The effective delivery of this policy including training, guidance and support required by staff for implementation of this policy will be provided by the Homeowner Services Team.

5. Compliance and Monitoring

- 5.1. Compliance with this policy will be monitored by periodic reviews of case records by the relevant team manager.

6. Policy review

- 6.1. We will review this policy at least once every three years to make sure it remains relevant and accurate and at any point where
 - legislation/ regulation or industry changes require otherwise, making sure that it continues to meet our aims and industry best practice; or

We identify any problems or failures in this policy as a result of customer and stakeholder feedback, complaints, or findings from any independent organisations.

VERSION	CHECKED BY	AMENDMENTS	APPROVED AT/BY	DATE OF APPROVAL	PUBLISHED BY	DATE OF REVIEW
1.0	Homeowner Services Manager	New Policy	Board	Nov 2024	Office Management	Nov 2027