1. What is the purpose of this policy?

This policy aims to balance the rights, choices, and independence of bpha customers with the need to manage risks effectively. It aims to identify and support vulnerable customers, ensuring they receive the necessary assistance to sustain their tenancies and enhance their quality of life. It ensures a supportive and inclusive approach that prioritises well-being and safety while maintaining dignity and respect.

2. What are the main principles of the policy?

The policy follows a set of key principles:

- Person-centred approach: Each customer's needs, preferences, and aspirations are at the heart of service provision
- Empowerment: customers are supported to make informed choices about their lives
- Partnership: working with customers, families, and support services to manage risks effectively
- Safeguarding: ensuring customers are protected from harm, abuse, and neglect while respecting their autonomy
- Legal compliance: aligning with housing, health and safety, and safeguarding laws and regulations.

3. Who is the policy for?

This policy applies to all bpha customers, including those who own their home or may rent their home through a bpha leaseholder.

4. How do we define vulnerability?

We recognise that an illness or disability can be temporary or permanent and that 'ability' can be a changeable state influenced by multiple factors and experiences such as age, disability, pregnancy, bereavement, mental health, domestic abuse, poverty and more. All of this can affect a customer's ability to carry out day-to-day tasks independently.

The Housing Ombudsman Service recommends that all landlords should implement a vulnerability policy, ensuring that we 'recognise, respond and appropriately record vulnerabilities'. We believe that by following a person-centred risk-based approach we will not only respond to vulnerability but to issues that impact on customers short and long term but do not necessarily make them identify as 'vulnerable'.

5. How will we identify vulnerability and household risk?

We will aim to identify customers and potential customers who are, or may be more likely to become, vulnerable. This will be done through a variety of actions including collection of data at the start of their relationship with us, through ongoing contact, risk assessment where concerns are highlighted and targeted campaigns asking customers to share any issues that they feel could impact the way we deliver services to them. We will actively encourage customers to share this information through a relationship developed on trust.

We expect colleagues and contractors to be aware that a customer may be vulnerable.

We will train colleagues to enable them to recognise potential signs of vulnerability, working in a more holistic way to consider why an activity is taking place, for example where anti-social behaviour may be as a direct result of mental health issues or people are unwilling to provide access to their home for a variety of reasons.

We will request consent to record customer information we capture in our systems, along with any the details of other support they may access, enabling us to work holistically and provide the best service to them.

We will, with the support of customers, aim to ensure this information is up to date and relevant to the services they receive from us.

6. How will we use the information?

A person-centred approach is at the core of our Customer Strategy, and we will embed this across bpha to enable us to deliver services to at-risk and vulnerable customers in a way that meets their needs.

Services will be tailored to the situation the customer finds themselves in with an understanding that there may be limits to the service we provide, and external support may be more appropriate.

To do this we will follow our Customer Reasonable Adjustment Policy which is available to all customers on our website.

Different activities take place across our customer-facing services meaning they will use information in different ways. The below provides examples but is not exhaustive.

Communication

The ability to communicate easily is key and we will ask customers to confirm their preferred communication methods at each point of contact and aim to follow these throughout our relationship with them, other than where there are legal or emergency/safety reasons to differ.

We will make our services, and the information provided about them, as accessible as possible using different channels, methods and available tools to meet need.

Customer engagement

We want to hear from all customers about their experience of bpha, whether it be positive, negative or suggestions for improvement.

We will provide a variety of opportunities to engage and feedback, that can be caried out from home, one-off activities, short term, through to long term commitment as involved customers.

Allocating a home

When allocating a home, we will assess the suitability of the applicant for the home in question. Our priority is making sure it meets the needs of the customer at that time and is affordable for them to maintain.

We will identify any risks and vulnerabilities at the time of the letting and suggest options to the customer for support whether it be internal or external services.

We will retain the information collected with the customers consent to support the provision of future services and request that the customer provides any updates that may impact on them living safe and well in their home.

Tenancy sustainment

We can provide additional support to customers to maintain their tenancy through our Money Advice and Tenancy Sustainment teams. The information collected at the start of a tenancy or through contact throughout the relationship will enable these to be offered at the most appropriate time for customers.

Our aim is to give everyone the best opportunity to live in their home with ease and feel secure in their tenancy.

Repairs and maintenance

We prioritise the completion of repairs based on urgency but will consider any vulnerabilities customers make us aware of and the impact these have on that level of urgency, where possible completing the repair more quickly.

We will support customers with requests for adaptations to their home supporting applications for funding and completing works within our ability and budget.

Anti-social behaviour (ASB)

We know that there are many causes of ASB, and that vulnerability can lead to customers behaving in way that causes concern to others. We also understand that vulnerabilities can place customers in a position where they are the target of ASB.

We will use the information we hold to look for opportunities to get involved before incidents occur. We can use previous activity, safeguarding information and other tenancy information to provide a holistic view and enable a proactive approach.

The more information we have the more targeted the activity can be, this may involve the involvement of other external agencies.

Visiting and service guidance

To provide the best and most appropriate services to customers when we visit their homes, we will use the information captured around risks or vulnerabilities to create visiting and service guidance. This means for example if a customer is hard of hearing that the guidance will ask the colleague in attendance to knock loudly, wait and try again. We will agree the content of this guidance with affected customers.

Heat networks

bpha acts as an energy supplier for a number of customers, this includes the supply of heat and hot water. We will ensure that we manage our networks in line with OFGEMS Heat Network Regulations. This will include a considered approach to vulnerable customers, who could be impacted by our management of heat networks in a number of ways as per below:

- Loss of heat/hot water for extended time periods
- High costs of heat/hot water
- Debts increasing as a result of non-payment of heating bills
- Customer service standards in relation to metering and billing.

In order to ensure that we protect vulnerable customers from any adverse impacts of the above we will follow regulatory requirements and best practice including the following:

- Maintain a 'priority services register' to ensure we can reduce the impact of any temporary loss of heat or hot water on our vulnerable customers
- Ensure we obtain value for money when we buy our gas/electricity so that passed through costs to customers are good value
- Set tariffs and service charges in a fair and transparent way without seeking to make profit
- Have an appropriate debt management process for vulnerable customers who are subject to metered heat charges from bpha
- Consider customers vulnerabilities and carry out equality impact assessments when making decisions such as whether to write off debts or switch residents to pay as you go metering
- Monitor the performance of any metering and billing agents to ensure services are managed appropriately.

7. Working with partners

Where bpha does not have the expertise to provide the appropriate service to a customer at a given point of time, we will work with partners to access the support they require. We will aim to seek customer consent before any referral is made.

8. Training

We will ensure that all colleagues have the appropriate training to recognise vulnerabilities and other risks that impact on customers living safe and well in their homes.

They will be trained to record and use the information in a holistic person-centred way.

9. How will this policy be communicated to customers?

We will:

- Place a copy of this policy on our website
- Ensure our website is clear on the standards of service customers can expect
- Promote the policy through the website, social media and Talk magazine.

10. How will we monitor and review the policy?

bpha will review the effectiveness of this policy to incorporate best practice and legislative updates. bpha will seek feedback from customers and colleagues to ensure lived experience guides the approach taken whilst recognising the limitations on bpha as a landlord.

Case reviews will take place to support continuous learning and improvement around individual situations, and training developed to respond to any learning.

Policy Number	Approved by	Date Approved	Policy Owner	Date of next Review
HO110	Customer Experience Committee	May 2025	Head of Service Improvement	May 2028