



VULNERABILITY AND REASONABLE ADJUSTMENTS STRATEGY

2024-2027



1.0 INTRODUCTION

- 1.1 CGA is committed to promoting equality, diversity and inclusion and a culture that actively values people as individuals and endorses the principles of the Human Rights Act 1998 in that everyone has the right to be treated equally, with fairness, dignity and respect.
- 1.2 CGA recognise that some customers may be vulnerable for a number of reasons, and we are committed to delivering services which meet customers individual needs and are fair and accessible to all.
- 1.3 We understand that some customers will have a degree of vulnerability that may impact how they are able to manage their home or engage in their community. We also recognise that a customer can become vulnerable over the course of their time with CGA and that their vulnerability can be variable, may occur at different points in time, may be temporary, periodic or recurring as well as ongoing and developing over time.
- 1.4 To enable our customers to remain in their homes and to live as independently as possible, we are committed to ensuring that every opportunity has been provided to support them in their tenancies.

2.0 DEFINING VULNERABILITY

- 2.1 We may consider a customer to be vulnerable as someone who:
 - a) has a particular characteristic and/or has experienced an exceptional life event and,
 - b) is currently unable to act independently and/or unable to cope with managing their tenancy without additional support.

2.2 Our definition reflects our understanding that vulnerability can be a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health and many others. We recognise that vulnerability is unique and requires individual assessment for us to provide appropriate, reasonable and practical adjustments to the services we deliver.

3.0 OUR CURRENT POSITION

3.1 CGA as a community led organisation has always provided support to customers and has during its lifetime responded to the changing environment.

3.2 The development programme is informed by Preston City Councils' Housing Need and Demand Assessment and has been influenced by a CGA commissioned demographic report. The report reflected an ageing population to which CGA tailored its programme to include an increased and enhanced accommodation offer for older people.

3.3 We work in partnership with the local authority and other housing providers to allocate properties in line with regional Choice Based Lettings schemes in our areas of operation which consider priority need and vulnerability.

3.4 During the last 3 years we have developed a homelessness service dedicated to those who are at their most vulnerable. Working with local authority partners we have repurposed assets to establish The Spires, a 26-unit scheme for single homeless individuals, and provide up to 40 homes through the Rough Sleeper Initiative, both with a dedicated support team. During 2025 we hope a new homeless family unit will come to fruition to further support Preston City Council to meet its homelessness obligations.

3.5 We have continually realigned our services to ensure our customers are at the heart of our activities and are able to cope with changing circumstance, whether that has been the provision of the Purple Pantry, providing low-cost food during

the COVID pandemic or operating a school uniform bank to help parents cope due to the cost of living crisis.

3.6 CGA recognises that individuals and groups of individuals may be more vulnerable or experience events that increases vulnerability and we invest in teams that have dedicated supporting roles:

- Tenancy Support Team - promoting financial inclusion;
- Engagement Team - ensuring our customer voice is heard;
- Safeguarding Officers - dedicated to safeguarding concerns;
- Tenancy Management Team - promoting sustainability;
- Outreach Service - enabling customers to live independently;
- Housing Pathways - bespoke support to those moving from homelessness;
- Independent Living - including a lifeline and response service;
- Aids and Adaptations - maintaining independence in your own home.

3.7 The Service Transformation Strategy introduced in 2023 acknowledged that as an organisation we needed to evolve, review our service offer, deliver brilliant basics and ensure that our customers are the golden thread that runs through everything that we do.

3.8 The Service Transformation Strategy and the Equality, Diversity and Inclusion Strategies and their associated action plans are intrinsically linked to this strategy, placing tenants at the heart of all we do and provide the foundation for CGA to deliver services in a human centric way that supports people as individuals.

3.9 The progress made to date from the introduction of the Service Transformation Strategy underpins the skills, knowledge and learning for the next steps in enhancing the services we deliver to people with vulnerabilities. We have:

- Renewed our vision, values and behaviours, strengthening our organisational culture and commitment to delivering great customer service;
- Established our Speak Out campaign and ensured it is embedded and encourages professional curiosity and ownership;
- Developed a new Customer Insight Framework, capturing increased learning and opportunities for service improvements;
- Updated our customer communications and continue to evolve our website;
- Completed an organisation wide 'Every Customer Matters' training programme and work continues to embed the learning from this;
- Updated our job descriptions, induction processes and policies/procedures to ensure colleagues have greater clarity and understanding regarding their role and responsibilities;
- Reviewed our data management arrangements which provides the direction for improvements to be made.

3.10 Whilst we continue to evolve and make service improvements, we recognise that there is more to do.

3.11 Colleagues require further training, and we need to improve our data management to ensure we can recognise, anticipate, respond and record appropriately customers' vulnerabilities and make individual adjustments to the way in which we deliver our services.

4.0 PURPOSE OF THE STRATEGY

4.1 The strategy recognises the business need to continually evaluate its services to meet the needs of vulnerable individuals. The key aims of this strategy are to:

- Deliver on our Corporate Plan priority of: 'Providing Great Customer Service';
- Improve overall satisfaction and satisfaction with individual services;

- Ensure all colleagues routinely demonstrate the values and behaviours expected of them, offer services that are fair and are delivered with empathy and respect;
- Upskill all colleagues to recognise and understand vulnerability and deliver human centric services;
- Ensure customers are listened to, both individually and collectively, so that we can make individual reasonable adjustments that make a difference;
- Ensure our customers feel valued and respected;
- Hold the relevant household data to support vulnerability and provide reasonable adjustments;
- Make better use of the customer data and insight we hold, to gain a deeper understanding of any areas where we can improve our services;
- Ensure our services are compliant with all statutory and regulatory standards and best practice.

5.0 SCOPE OF THE STRATEGY

- 5.1 This strategy applies to all services delivered by CGA including services to our tenants, leaseholders, housing applicants and other customers.
- 5.2 The strategy has responsibilities for all colleagues to work in an inclusive and non-discriminatory way, which considers vulnerability and service adjustments.
- 5.3 The Vulnerability and Reasonable Adjustments Policy will be used to amend or temper other policies when it is apparent that there is a vulnerability to be considered.
- 5.4 The strategy has been informed by the Regulator of Social Housing Consumer Standards, Better Social Housing Review, the Housing Ombudsman's Relationship of Equals report, Knowledge and Information Management review, the CGA Customer Insight Framework and Tenant Satisfaction Measures.

6.0 THE STRATEGY

This strategy contains 3 themes with a number of objectives for each.

6.1 THEME 1 - CUSTOMER FIRST CULTURE

Over recent years significant change has taken place within the housing sector and our organisation; the service transformation review highlighted that our strong customer service culture was no longer as embedded as it once was. Having launched the new vision and values it is important we continue to maintain focus on the culture of our organisation and understand it's impact on how we deliver services.

6.2 The following actions, contained within the Service Transformation and/or Equality Diversity and Inclusion Strategies will support the delivery of this objective:

- Continue to embed the vision, values and behaviours ensuring they become an integral part of delivering services to vulnerable people;
- Embed Every Customer Matters training to support a customer centric approach, developing communication skills to create positive relationships;
- Review bespoke training for all customer facing teams in line with recommendations and Housing Ombudsman Spotlight learnings;
- Develop and embed a challenge culture to improve accountability and ongoing learning;
- Complete the call handler training programme;
- Review the CGA colleague support offer to customer facing teams.

6.3 In addition, we will:

- Include Vulnerabilities and Reasonable Adjustments in the 'Managing the Gateway Way' training programme; and
- Deliver a bespoke leadership and management training programme that includes provision for a greater understanding of how we support people with vulnerabilities; and

- Amend and temper policies and procedures, in line with the principals of this strategy where it is apparent that there is a vulnerability to be considered; and
- Encourage professional curiosity through training, appraisals and processes, promoting reaching out to customers to better understand their vulnerability. This is ongoing and progress will be reviewed on an annual basis.

6.4 **THEME 2 - IMPROVING OUR DATA**

To ensure a high-quality service that supports vulnerable customers and facilitates colleagues to make reasonable adjustments it is imperative that we know our tenants and properties and that our record keeping is accurate and up to date.

6.5 The following actions, contained within the Service Transformation and/or Equality Diversity and Inclusion Strategies, will support the delivery of this objective, and also read across to central planks of our Digital and Data Strategies:

- Review our core housing management and contractor systems;
- Provide training for all colleagues on the collection, update and use of profiling information;
- Develop and deliver a data training programme for all colleagues;
- Make better use of the data we hold, analyse vulnerability information to identify trends, opportunities for learning or service improvements;
- Develop and embed a plan for updating profiling information;
- Continue to be abreast of Preston demographic data to determine future housing need.
- Develop an approach to identifying 'silent tenants' and implement an audit programme;
- Review properties where we have access issues and improvement refusals to understand any underlying issues.

6.6 In addition we will:

- Further develop the Housing Management System to support household information, vulnerabilities and reasonable adjustments in a way that is easily accessible; and
- Strengthen the information we hold to include household members where appropriate; and
- Review General Data Protection Regulation training in relation to vulnerabilities;
- Update our systems with appropriate Tenant Satisfaction Measure data through an ongoing rolling programme; and
- Monitor and learn from complaints that have identified a vulnerability or reasonable adjustment requirement through quarterly reviews.

6.7 **THEME 3 - TAILORING OUR SERVICES**

To recognise when and how to make adjustments, we need to know more about our customers and household members. With increased knowledge and information, we will be better placed to foresee when an adjustment is required and understand, without making assumptions, what that might be. We need to do more to understand how situations and events impact on behaviours so that we can tailor our communications and services to individual needs.

6.8 The following actions, contained within the Service Transformation, Equality Diversity and Inclusion, Community Empowerment and/or People strategies will support the delivery of this objective:

- Listen to our customer's voice;
- Continue to review the effectiveness of 'See It, Sort It, Speak Out' campaign to make every visit count;
- Continue to review all customer correspondence and communications to ensure customer friendly language is used, is easily accessible and considers our customers' needs.

6.9 In addition we will:

- Continue to make appropriate referrals to CGA's advice and support services and/or signpost to external providers/statutory agencies where they are better placed to provide support; and
- Continue to work cooperatively with other agencies and develop new partnerships as needs change to enhance the support offer; and
- Develop professional curiosity to recognise vulnerability, the connection to behaviour and positive meaningful adjustments; and
- Introduce vulnerability oversight to Gateway Central and Board in the quarterly Customer Insight reports; and
- Review Ethnicity, Diversity and Inclusion training in relation to vulnerable customers and making reasonable adjustments.

7.0 KEY MEASURES

- Successful delivery of this Strategy will be demonstrated through the completion of the objectives in the Vulnerability and Reasonable Adjustments plan, and the relevant actions set out in related strategies.
- The Tenant Satisfaction Measures will be used to assess customer satisfaction with individual services.
- Analysis of complaints using vulnerability indicators.
- The proactive participation of colleagues from across the organisation in the See It, Sort It, Speak Out campaign, making every visit matter.

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