

Vulnerability Policy

Pinnacle Group



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1. Policy Purpose and Scope

This Vulnerability Policy explains how Pinnacle Group identifies and supports customers who may be vulnerable. It applies to all residents and household members living in homes owned or managed by Pinnacle.

Pinnacle is responsible for making sure its services are fair and easy to access for all customers. We will make reasonable adjustments and provide suitable support so customers can use and benefit from our services.

We understand that some customers may be vulnerable and may need extra support to access our services. Vulnerability can be caused by one issue or by several factors. It can also happen at different times in someone's life. For example, a person may need short-term support after a bereavement, while another person may need ongoing support.

This policy is for Pinnacle colleagues. It helps us meet our legal and regulatory responsibilities where they apply. It also explains what colleagues should do when they identify a vulnerable customer, so that reasonable steps are taken to reduce risks to the customer's wellbeing and to make sure everyone is treated fairly.

We are committed to giving appropriate support to all customers. This is part of Pinnacle's wider commitment to making sure our services meet all relevant legal duties.

These duties are explained in more detail in section 9 and include, but are not limited to, the Equality Act 2010, Care Act 2014, Financial Conduct Authority (FCA) CONC 8.2.7 where relevant, Social Housing (Regulation) Act 2023, Data Protection Act 2018 and the Housing Ombudsman's Complaint Handling Code.

This policy does not remove a customer's responsibility to meet the terms of their contract, whatever type of home they live in. Pinnacle may use discretion when applying operational policies and procedures, so we can treat customers fairly while still meeting our business obligations.

This policy does not replace Pinnacle's Safeguarding Adults and Safeguarding Children Policy and Procedure. If any safeguarding concerns are identified, colleagues must follow Pinnacle's safeguarding process before taking any further action.

This Vulnerability Policy Statement is a high-level policy statement and should be read together with the related Pinnacle Group policy guidance documents.

Pinnacle is committed to making sure our working practices and services meet the needs of all customers, especially customers with disabilities or temporary or short-term conditions who may otherwise be disadvantaged. We will make reasonable adjustments to our services where needed. This may include changes to premises, changes to policies and procedures, or providing information in a different format or communication method to meet individual needs. We will aim to make our services accessible to customers with disabilities and to customers who are not disabled.

Pinnacle recognises its duties under the Equality Act 2010. The Act does not define what counts as a 'reasonable adjustment'. However, the Equality and Human Rights Commission says the following factors should be considered when deciding whether an adjustment is reasonable:

- How well the adjustment would reduce or remove the disadvantage the customer would otherwise face.
- Whether the adjustment is practical.
- How much disruption the adjustment may cause.
- The financial and other costs of making the adjustment.

- The resources already available.
- Whether financial support or other help is available.

Where Pinnacle is told that a customer or household member has a condition or situation that puts them at a disadvantage, we will look at whether reasonable adjustments are needed in how we deliver services. We will consider each case based on the information available and in line with Pinnacle's Vulnerability Policy and Aids and Adaptations Policy. We will not make assumptions about what a customer needs or what adjustments may be appropriate. We will try to agree and provide adjustments within a reasonable timescale that works for everyone. In some cases, there may be a delay while specialist advice is obtained. If this happens, we will keep the customer updated on progress.

2. Policy Key Objectives

This policy sets out our key objectives for identifying and supporting vulnerable customers.

All colleagues and managers must help make sure these objectives are followed.

No	Vulnerability Policy Key Objectives
1	Explain how Pinnacle defines vulnerability and how colleagues should identify customers who may be vulnerable.
2	Explain the services and processes Pinnacle has in place to support vulnerable customers.
3	Explain roles and responsibilities for supporting vulnerable customers and how Pinnacle will check that the policy is being followed.

3. Key Policy Principles

Pinnacle will take appropriate steps to consider the circumstances of any customer who may be especially vulnerable or at risk of disadvantage.

Under the Equality Act 2010, we have a legal duty to make reasonable adjustments in the following three situations:

1. Where a policy, rule or way of working puts a person with a disability at a substantial disadvantage compared with people who are not disabled.
2. Where a physical feature puts a person with a disability at a substantial disadvantage compared with people who are not disabled.
3. Where a person with a disability would be put at a substantial disadvantage without an auxiliary aid or support.

We also recognise that some customers may need:

- Changes to how we communicate with them and provide support.
- Special consideration before legal action, enforcement or prosecution is taken.

Pinnacle recognises that vulnerability is a situation a person may experience, not a personal characteristic. Vulnerability can arise from many different circumstances. People are affected in different ways, so one customer may become vulnerable in a situation where another may not.

We believe the welfare of any vulnerable person or child is extremely important. Anyone who is vulnerable has the right to be protected from abuse, regardless of gender, ethnicity, disability, sexual orientation, gender identity or beliefs.

We recognise that every person is different and has their own circumstances. Wherever possible, we will consider each person's needs and adapt our approach to suit them.

We have several processes and tools to help us do this. These are explained in more detail in Section 6.

All Pinnacle colleagues and contractors who have direct contact with members of the public as part of their work will go through appropriate selection and vetting checks. Where appropriate, this may include basic criminal record checks.

Any complaint about the mistreatment of vulnerable customers will be taken very seriously and fully investigated. Where appropriate, we will work with relevant law enforcement agencies.

All colleagues and contractors working for, or on behalf of, Pinnacle Group will be made aware of this policy.

4. How Pinnacle defines a customer with vulnerabilities

We use the following definition of a customer with vulnerabilities:

Vulnerability means that a customer, or someone in their household, may have reduced capacity or resilience on a temporary or permanent basis. This may be because of their physical health, mental health, or personal circumstances, and may increase the risk of harm to their wellbeing.

We understand that vulnerability can be temporary, get worse over time, or be ongoing. It can be difficult to define, but we will usually consider someone to be vulnerable if:

Their personal circumstances or characteristics mean they are much more likely than most people to be negatively affected by the way Pinnacle deals with them, or where the impact on them is likely to be more serious.

In this policy, 'customer' means tenants, leaseholders, shared owners and people in their households who live in homes owned or managed by Pinnacle Group.

For this policy, a 'vulnerable adult' means someone aged 18 or over who has any of the following:

- A learning disability or physical disability.
- A physical or mental illness, whether short-term or long-term, including an addiction to alcohol or drugs.
- Reduced physical or mental capacity.
- A need for help from others to carry out physical activities or daily functions.
- Significant difficulty communicating with others, including because of hearing loss or sight loss.
- Difficulty protecting themselves from assault, abuse or neglect.

For child protection purposes, a 'child' means anyone under the age of 18. If a colleague is concerned about a child's welfare, or receives a safeguarding disclosure from someone else, they must treat it seriously and respond immediately in line with Pinnacle's Safeguarding Adults and Safeguarding Children Policy and Procedure.

Examples of situations where an adult or child may be vulnerable include:

- Physical or mental health conditions.
- Disability.
- Learning difficulties.
- Times of stress or anxiety, such as bereavement, domestic abuse or being a victim of crime.
- Being a care leaver.
- Financial vulnerability, where a transaction could affect the customer's ability to look after themselves or could leave them in financial hardship.
- English not being the customer's first language.
- Being under the influence of alcohol or drugs.

5. Identifying vulnerability

It is important that we communicate openly with customers so they feel able to tell us about any vulnerabilities or support needs. Customer-facing colleagues should understand what vulnerability means and how it may affect a customer. This will help colleagues communicate clearly, identify support needs early, and direct resources in a way that reduces the risk of service failure or harm.

6. How will Pinnacle support customers with a vulnerability?

Pinnacle has a range of services and processes to support customers. Some customers may need reasonable adjustments but may not be vulnerable. For example, a customer with sight loss may need us to communicate with them in a different way. This could include providing information in large print, Braille, digital or audio format.

- Language support: We understand that a language barrier, especially when combined with other factors such as age or social isolation, may make someone more vulnerable. Pinnacle offers language support such as translation and interpretation services, leaflets or information in other languages through the Ark App, easy read tenancy agreements, and web accessibility.
- Communication options such as email, text message, phone, Brolly, the Ark App, post, or in-person contact.
- Debt support through arrears escalation and the pre-court protocol.
- Adjustments to repairs services where needed.
- Additional support from Pinnacle Property Managers and referrals to other agencies where appropriate.

Pinnacle has a process for identifying, considering and, where appropriate, putting in place adjustments for customers who may need them. This is important because every customer's circumstances are different, and we need to look at each person's individual needs.

Customers at immediate risk of harm

If a colleague or contractor meets a customer who is at immediate risk of harm, either from themselves or from someone else, they must follow Pinnacle's Safeguarding Policy Statement and Procedure. These cases are rare, but the consequences can be serious. Pinnacle will take appropriate steps to reduce the risk of harm. Examples include:

Threats of suicide: If a customer says they are suicidal and there is an immediate risk they may harm themselves, colleagues and contractors must act quickly in line with Pinnacle's Safeguarding Adults and Safeguarding Children Policy and Procedure. This may include sharing the customer's details with emergency services so they can help.

Customers at risk of domestic abuse: If a customer tells us they are experiencing domestic abuse, we can recommend extra safeguards that may help protect them.

Pinnacle is committed to putting this policy into practice, monitoring it, keeping it up to date and reviewing how well it works. This includes providing the resources needed to support the policy, including training for all relevant colleagues.

Support for colleagues: Colleagues should speak to their line manager before, during or after an incident involving a vulnerable adult or child. Line managers will provide support. Safeguarding training is mandatory for all customer-facing colleagues, and further guidance is available in the Safeguarding Policy.

Training and awareness

Pinnacle will make sure all relevant colleagues receive training on how to identify vulnerable customers and respond appropriately.

Pinnacle will work through its contracts with contractors and subcontractors to make sure suitable arrangements are in place to protect vulnerable customers. Where relevant, providers may be asked to show how they support vulnerable customers, including by providing copies of any relevant vulnerable customer policy.

Partnership Working

The issues that can make someone vulnerable can be complex and may need several agencies to work together. Where practical and helpful for the resident, Pinnacle will take a multi-agency approach and work with partner organisations to provide joined-up support through:

- Service level agreements and information sharing protocols.
- Checking relevant information before and at sign-up.
- Raising awareness with partners about individual issues and wider trends.
- Making referrals to support providers or statutory services, and following up on the outcome of those referrals.
- Signposting residents to support services, advocacy services and advice agencies.
- Holding case conferences where needed.

7. Recording vulnerability

We will use our systems to record vulnerability information and any service information we need. Where appropriate, this information will be time-limited so it stays accurate and supports compliance.

Recording vulnerability information on Pinnacle systems helps services make the right adjustments and get things right first time. Making customers' needs more visible helps us adapt services, understand customers better, and direct resources where they will have the most benefit.

8. Supporting policies and procedures

Pinnacle's approach to supporting customers with vulnerabilities and support needs is explained in our policies and procedures. These include, but are not limited to:

- Anti-social Behaviour Policy and Procedure
- Hate Crime Policy
- Complaints Policy
- Domestic Abuse Policy and Procedure
- Allocations Policy
- Income Policy
- Repairs Policy and Procedures
- Aids and Adaptations Policy
- Safeguarding Adults and Children Policies

9. Legal Framework

Pinnacle has duties under the **Equality Act 2010**. This includes advancing equality of opportunity between people who share a protected characteristic and people who do not. We also recognise that customers may be vulnerable for reasons that are not covered by equality legislation. This policy explains how we define vulnerability and how we aim to respond to customers' needs.

Pinnacle aims to treat all tenants with fairness and respect. We will use relevant information and data to understand tenants' different needs, including needs linked to protected characteristics, language barriers and additional support needs. We will use this understanding to help make sure our services are fair, accessible and appropriate.

The **Housing Ombudsman Complaint Handling Code** says landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures or processes to meet an individual's needs. Landlords must have a reasonable adjustments policy in place to deal with this.

The main laws, regulations and standards that support this policy are listed below.

- Equality Act 2010
- Regulator of Social Housing's Transparency, Influence and Accountability Standard.
- Housing Ombudsman Complaint Handling Code.

- Anti-social Behaviour, Crime and Policing Act 2014
- Hate Crime: The Crime and Disorder Act 1998
- Protection from Harassment Act 1997
- Safeguarding Vulnerable Groups Act 2006
- Disabled Persons (Services, Consultation and Representation) Act 1986
- Mental Capacity Act 2005
- Human Rights Act 1998
- Financial Services and Markets Act 2000.
- Housing Act 1985, 1988, 1996 & 2004
- Housing and Regeneration Act 2008
- Data Protection Act 2018
- Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019
- Domestic Abuse Act 2021
- Care Act 2014
- Children Act 2004.
- Homelessness Act 2002
- Financial Conduct Authority (FCA) CONC 8.2.7
- Social Housing (Regulation) Act 2023

10. Collecting and Processing Data

Vulnerability data may include information about a person's health. Under the UK General Data Protection Regulation (UK GDPR), this is special category personal data. Special category data is sensitive and needs extra protection. Pinnacle relies on the 'substantial public interest' condition under Article 9 of the UK GDPR when processing this type of data.

We will tell customers why we are processing their vulnerability data. Pinnacle's [Privacy Notice](#) explains why we process personal data and what rights customers have. Colleagues who collect vulnerability data will receive training so they can explain to customers why the information is needed.

Wherever possible, Pinnacle will only collect the personal data it needs.

When we collect less personal data, it is still important that the information we do record is up to date, accurate, well protected and available when needed. When vulnerability data is collected or updated, it should be timestamped so colleagues can see when it was last reviewed.

For vulnerability records, the absence of information can also be important. Colleagues should update the record if a customer chooses not to share vulnerability data, or if they were not asked to provide it, so that appropriate action can be taken.

If a vulnerability may be temporary, this should be recorded. There should also be a clear process for reviewing any adjustments at an appropriate time.

Vulnerability data should only be available to colleagues and contractors who need it for their role or work. They should also be able to access it promptly when needed.

All colleagues will be trained on how to process vulnerability data. This will include reminders about confidentiality, the need to collect accurate and up-to-date information, and how the data should be used.

11. Zero Tolerance

Pinnacle will not tolerate threats, abuse, aggression, discriminatory behaviour or violence towards colleagues or contractors. If anyone behaves in this way towards people working for, or on behalf of, Pinnacle, we will take immediate action. This may include legal action. The person responsible may be:

- Reported to the police.
- Required to contact us only through specific communication channels.
- Banned from attending Pinnacle premises.
- Have services temporarily withdrawn while we put measures in place to protect colleagues and contractors.

12. Monitoring, Review and Evaluation

We will monitor key performance indicators at group, directorate and local team level.

We will review this policy at least every three years to make sure it still meets its objectives and reflects good practice. We may review it sooner if there are changes in legislation, business needs or the sector.

13. Diversity and Inclusion

Pinnacle will treat all customers fairly and with respect. We recognise our ethical and legal duties to support equality of opportunity and prevent discrimination because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

This policy and any related documents can be translated, interpreted, or provided in an accessible format where needed.