



SUPPORTED CUSTOMERS POLICY

Responsible Director: Director of Homes and Wellbeing

Responsible Manager: Head of Homes and Wellbeing

Last updated: February 2019

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B11 Supported Customers Policy

1. Policy Statement

- 1.1 NCHA's mission statement is "to provide high quality housing, services and support for more people in need". NCHA recognises its responsibility under the Equality Act 2010 as a provider of a 'Public function' to protect people from discrimination and adhere to the 'Public Sector Equality Duty'.
- 1.2 The primary objective of the Supported Customer's Policy is to provide a structure for the recording, processing and sharing of special category data which enables NCHA staff to provide tailored support to ASH (Affordable and Social Housing) tenants and applicants who have a support need and/or one or more of the 'protected characteristics' defined under the Equality Act, 2010.
- 1.3 The objective of the policy is to improve access to and satisfaction with NCHA services and assist tenants with support needs to manage and sustain their tenancies. NCHA hope that providing additional support will increase tenancy sustainability and reduce the rate of tenancy failure.
- 1.4 These aims will be achieved by providing ASH staff with the information needed to differentiate and personalise the service that they provide to meet the needs NCHA tenants and customers.
- 1.5 The policy will also detail the process and procedure for tenants who are unable to manage their own affairs as a result of mental capacity, or are otherwise unable to deal with housing management or maintenance issues or appointments, including Power of Attorney/Court of Protection Deputy and informal agreements with limited levels of authority.
- 1.6 The Supported Customers policy also provides clear guidelines and limits for the collection, processing and sharing of customer and tenant 'Special Category' data collected as defined under the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

2. Data protection and the processing of Special Category and sensitive personal data

- 2.1 The Supported Customer's Policy sets out the principles of how NCHA will retain and process information for tenants and customers with support needs.
- 2.2 This policy has been written with reference to the NCHA Personal Data & Access Policy and to be fully compliant with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), the provisions of which apply from the 25th May 2018. This means that NCHA will fully adhere to the Information Commissioners Officer's 8 principles of Data Protection and will ensure that all staff involved in collecting, processing personal data have been appropriately trained so that they can apply the principles effectively when implementing the policy and providing support to tenants/customers.

- 2.3 All NCHA tenants and customers are considered 'data subjects' with regard to the processing of Special Category data. NCHA recognises the primary importance of privacy of the individual data subjects and the principles of fairness, transparency and accountability in the processing of all personal data. In applying these principles, NCHA will collect only the minimum data required to provide necessary services and support to help tenants sustain their tenancies.
- 2.4 Special Category data is data which the GDPR says is more sensitive (and broadly similar to definition of sensitive personal data under the 1998 Act) and therefore needs more protection.
- 2.5 NCHA has a need to collect and process Special Category Data about tenants and customers in order to provide effective housing management and support services. Some personal data is necessarily collected and processed by way of the tenancy agreement. Other personal data is collected and processed in order to provide additional non-contractual services and tenancy support intended to help tenants with additional support needs manage and sustain their tenancy.
- 2.6 This policy sets out the Special Category Data which NCHA may collect to enable the provision of support services and how this information should be used, managed and reviewed.
- 2.7 NCHA tenants and customers should give consent for the processing of Special Category data including information about disability and other support needs. This information should be kept up to date and reviewed at least annually to confirm that the information retained is accurate. Where approval to retain the information is withdrawn, NCHA must delete the information.
- 2.8 NCHA will share Special Category Data held on tenants and occupants with statutory agencies including the Police, Fire Service, DWP, Local Authority Housing Benefit and Adult and Children's Social Services Departments and Health Services for appropriate purposes in accordance with the provisions of Article 9 of the GDPR.
- 2.9 NCHA will not share Special Category information with other non-statutory agencies including support providers and other social housing organisations without the explicit consent of the tenant/occupant or in the case of members of the household under the age of 18, without the explicit consent of the individual's parent or guardian.

3. The Equality Act 2010

- 3.1 The Equality Act 2010 confirms the following protected characteristics – age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 3.2 For the purposes of this policy, relevant protected characteristics are those which may lead to a tenant or customer require additional support in order to be able to live independently and adhere to the terms of their tenancy.
- 3.3 NCHA recognise that disability and health are changeable conditions and that some customers may require support for a short period whilst other customers have long term support needs or suffer from progressive conditions that mean that

support they need will increase over time. The Supported Customers Policy aims to ensure that all supported customers receive the same high standard of customer service by ensuring that staff can identify and understand the needs of individual customers and personalise the service that they provide in a positive way.

3.4 NCHA recognises that in order to meet the requirements of the 'Public Sector Equality Duty', we should be prepared to adapt our services to meet the varying needs of our customers. Whilst the majority of customers are capable of sustaining their tenancies independently, others may need varying levels of support require more support from their landlord. The nature of this need for support will vary and may be caused by problems with one, or more, of the following:

- Health
- Disability
- Learning Difficulties
- Mental Health Problems
- Personality Disorders
- Social/family circumstances
- Language
- Education
- Finances

3.5 This list is not exhaustive and we accept that customers may have other reasons for needing our help. Similarly the need for assistance is not necessarily a permanent state. NCHA's aim will be to provide an enhanced level of support for individuals and families in need – thereby enabling them to achieve and sustain the best possible level of independent living.

3.6 For the purposes of this policy, the term 'customer' includes customers and members of their household. Supported Customer information can be recorded against first and second customers and against other occupants of the property. However, any supported customer information should only be recorded with the formal consent of the individual or their parent/guardian/power of attorney/Court of Protection deputy if under the age of 18 or if the individual lacks the capacity to confirm consent.

3.7 It is important that all Affordable and Social Housing and Property Services staff are aware of the content of this policy and use the provisions to ensure that service provision is differentiated to meet the needs of individual tenants.

4. Risks

4.1 The most significant risk is a failure to comply with the Data Protection Act, 2018 and the General Data Protection Regulations which could lead to significant fines imposed by the Information Commissioners office and consequent adverse reputational impacts. These risks rate highly in NCHA's organisational risk register.

4.2 The regulations for processing the sensitive personal data of data subjects are wide-ranging and complex and it is important that staff have a full understanding of these and the Information Commissioners Officer's 8 data protection principles.

- 4.3 The most specific risks with regard to the Supported Customers policy are:
- Special Category data held on individual data subjects is not accurate, up to date or fairly or lawfully processed.
 - Data processed is excessive or not relevant and data is not processed for sufficiently limited purposes as stated in the NCHA Housing Services Data Privacy Notice.
 - Personal information is not processed in accordance with the data subject's rights.
 - Personal information is not kept secure and is passed to persons/organisations without the authorisation of the data subject.
 - Special Category data may be shared inappropriately with unauthorised persons/organisations resulting in a breach of the Data Protection Act 2018 and General Data Protection Regulations.
- 4.4 There is a high likelihood that an NCHA tenant/customer will make a Subject Access Request for their personal data and therefore claims made about potential data breaches.
- 4.5 The supported customer information relating to a customer/tenant or member of their household may not be recorded and/or staff may fail to recognise support needs and to adequately differentiate and personalise services to meet the needs of supported customers and members of their household.

5. Background

- 5.1 The Government defines a vulnerable adult as someone who is 16 years of age or over and:
- is or may be in need of community care services by reason of mental or other disability, age or illness
 - is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation
- 5.2 NCHA Affordable & Social Housing defines customers/tenants who are in need of support as people who are periodically, permanently or progressively:
- a) Physically disabled or suffering from a serious illness
 - b) With a learning disability
 - c) With mental health issues
 - d) Suffering from a form of dementia
 - e) With a personality disorder
 - f) Young people aged 16 - 21 years old
 - g) In receipt of tenancy support to help with tenancy sustainment
 - h) Care leavers and people leaving prison/probation accommodation
 - i) Refugees and others for whom English is not their first language
 - j) Difficulty with reading/writing and low levels of literacy/numeracy
 - k) Known to have issues around substance misuse
 - l) Physically frail or elderly
 - m) Choose to use an advocate in their dealings with NCHA and other agencies
 - n) Leaving move-on or supported accommodation

- o) Victims of domestic violence or hate crime
- p) Have been accepted as homeless or have recently been homeless
- q) Have recently left the armed forces

n.b. Victims of domestic violence, racial harassment and anti social behaviour will be dealt with according to the relevant NCHA Policy and will also have the opportunity to register with NCHA for assistance.

5.3 It should be noted that not everyone within an identified group will need support and some people not included in these defined groups will need support. This list must therefore be flexible, with each customer/tenant's needs considered on an individual basis.

6. Awareness Training

6.1 NCHA staff must undertake Disability Awareness training to ensure that they have an awareness and understanding of a range of disability and vulnerability issues that may affect customers.

6.2 The training should provide staff with the skills they need to identify the needs and personalise the support and services that they provide to meet the needs of individual customers and support them to maintain their tenancies.

7. Identification of customer/tenants with support needs and recording of Supported Customer information

7.1 Supported customers are identified in the Hub on The Capita Open Housing system using the 'Vulnerability Symbol' which will indicate to staff that they should check the 'Key Information' screen for full details of the Supported Customer attributes recorded.

7.2 Supported Customer attributes are recorded against the person on Capita so that specific Supported Customer information and service delivery needs can be recorded against specific members of the household. In addition, more than one attribute can be selected in order to record the full range of a customer's support needs.

7.3 Supported Customer codes have been revised to take account of GDPR requirements balanced against the need for staff to be aware of customer/tenant support needs.

7.4 List of attributes for Support Needs:

Support need type	Attribute	Name	Date recorded/last updated
Supported Customer/Vulnerability Attribute	VA – Supported Customer recorded on Capita		
Young Person:	Young person aged 16 - 25		

Care leaver/Supported accommodation	Care Leaver/Leaving supported accommodation		
Ex Prisoner	Former prisoner		
Sensory Impairment	Deaf/Hearing Impairment		
Domestic Violence	Survivor of Domestic violence		
Sensory Impairment	Registered Blind/Partially Sighted		
Poor Long Term Health	Poor Health/Physically Frail		
Physical disability	Wheelchair User/Mobility Scooter User		
Physical Disability	Physical/Mobility Impairment		
Learning Disability	General Learning Disability		
Learning Disability	Autistic Spectrum Disorder		
Mental Health Condition	Mental Health Condition		
Substance misuse	Substance misuse		

7.6 List of Communication/Service Delivery attributes.

Communication / Service Delivery Need	Attribute	Name	Date recorded/Last updated
Communication/Service Delivery Need	CSDN - Phone Only		
Communication/Service Delivery Need	CSDN - Letter Only		
Communication/Service Delivery Need	CSDN - Email Only		
Communication/Service Delivery Need	CSDN - Text Only		
Communication/Service Delivery Need	CSDN - Needs support to interpret written communication		
Communication/Service Delivery Need	CSDN - Large Print required		
Communication/Service Delivery Need	CSDN - Braille required		
Communication/Service Delivery Need	CSDN - Uses Text phone		
Communication/Service Delivery Need	CSDN - Uses Sign Language		
Communication/Service Delivery Need	CSDN - Uses Hearing Loop		
Communication/Service Delivery Need	CSDN - Speech Difficulty		
Communication/Service Delivery Need	CSDN - English as a Second Language		
Communication/Service Delivery Need	CSDN - Poor understanding of English		
Communication/Service Delivery Need	CSDN - Requires Translator		
Communication/Service Delivery Need	CSDN - Requires Translation of Written Communication		
Communication/Service Delivery Need	CSDN - Advocate – Maintenance only		
Communication/Service Delivery Need	CSDN - Advocate – Income only		

Communication/Service Delivery Need	CSDN - Advocate – Tenancy only		
Communication/Service Delivery Need	CSDN - Advocate – Power of Attorney		
Communication/Service Delivery Need	CSDN - Advocate – Court of Protection Deputy		
Communication/Service Delivery Need	CSDN - Appointment Necessary		
Communication/Service Delivery Need	CSDN - Needs Time to answer when contacted		
Communication/Service Delivery Need	CSDN - Make contact before sending written communication		
Communication/Service Delivery Need	CSDN - Visit in Pairs only		
Communication/Service Delivery Need	CSDN - DO NOT VISIT		
Communication/Service Delivery Need	CSDN - Support Worker		
Communication/Service Delivery Need	CSDN - Social Worker		
Communication/Service Delivery Need	CSDN - Probation Worker		
Communication/Service Delivery Need	CSDN - Tenant in Hospital		
Communication/Service Delivery Need	CSDN - Requires support to manage benefit claims		
Communication/Service Delivery Need	CSDN - Requires support to manage money		

7.7 List of Universal Credit attributes:

Universal Credit Vulnerability	Level 2 Attribute	Date Recorded/Last updated
Universal Credit Vulnerability	UCV - Tier 1	
Universal Credit Vulnerability	UCV - Tier 2	
Universal Credit Vulnerability	UCV - Budgeting Skills	
Universal Credit Vulnerability	UCV - Bank Account Type	
Universal Credit Vulnerability	UCV - Digital Access	
Universal Credit Vulnerability	UCV – Vulnerability	

For more information regarding Universal Credit please contact your Income Officer.

7.8 Identifying supported customers/tenants

- 7.8.1 Potential customers should complete the Supported Customers' form (Appendix 1) in order to identify relevant supported customer needs. Customers can provide supported customer information to be recorded on Capita or opt not to provide information.
- 7.8.2 Staff must complete the Supported Customers Form with the customer/member of their household (data subject). Completion and signing of the form will form consent to record, process and share the information with relevant statutory organisations for the purpose of providing tenancy support services to tenants and members of their household in accordance with Article 9 of the GDPR.
- 7.8.3 Customers/tenants also have the option to consent to supported customer information to being processed only by NCHA staff and statutory organisations or to consent to the sharing of Supported Customer information with non-statutory support organisations.
- 7.8.4 The Supported Customer's form should also be completed for non-tenant members of a household (including parents/guardians where the supported customer is under the age of 18 or the Power of Attorney/Deputy of the Court of Protection where the tenant/member of the household lacks the capacity to make their own decisions).

8. **Pre-tenancy assessment**

- 8.1 Potential customers will be asked to provide this information as part of the Pre-tenancy Assessment. All potential customers/tenants will be able to decline to provide Supported customer information, permit the retention and processing of information by NCHA staff, and permit or refuse consent for sharing of information with other agencies/organisations.

9. Support for customers/tenants who have refused to declare support needs;

- 9.1 Customers who refuse to consent to the recording and processing of supported customer information should still be provided with differentiated services/support if the member of staff is aware that the customer/supported tenant has support needs.

10. Maintaining & updating information

- 10.1 It is essential that the information maintained on the Capita Openhousing system is maintained and kept up to date. Supported Customer attributes should be reviewed and updated annually through the completion of a new Supported Customer's form and date of review recorded to ensure that NCHA has the explicit consent of tenants/customers for the recording, processing and sharing of data. This exercise will be undertaken by Estates team.
- 10.2 NCHA recognise that customers who are initially not recognised as having support needs, may develop support needs and require support during the period of their tenancy and that the level of support a customer requires may vary.
- 10.3 Staff should speak to the tenant/customer to confirm whether they wish supported tenant/customer to be recorded/processed and shared. Where the tenant agrees to recording/processing and sharing, the tenant/customer should be sent the Supported Customer form. The information should only be recorded on Capita when the completed form has been signed and returned. Staff should note where the tenant/customer refuses consent to record/process and share the information, support can still be provided on an informal basis, but information must not be recorded on Capita.

11. Explaining to customers why information is stored & how it is used

- 11.1 Customers will be informed about how the information from the Pre-Offer Assessment, will be recorded on Capita and will be readily available to staff who have access to customers' computer records to help them provide an appropriate and personalised service and support.
- 11.2 The reason for keeping the information will also be explained (See Policy Statement above). Applicants completing the Pre-Tenancy Assessment must provide information (except for the information relating to religion and sexual orientation and Supported Customer Information which remains optional) Customers asked to complete the Supported Customers form have the right not to engage in completing it with a member of staff.

12. Informal Advocates

- 12.1 Supported customers have the option to use advocates or other more formal advocates/representatives including Power of Attorney/Court of Protection deputy to assist them in their day to day business with the NCHA. The advocate need not have any legal responsibility for the tenant's affairs (known for NCHA purposes as an 'Informal Advocate') and will not be held liable for any aspect of the conduct of their tenancy.

- 12.2 In order to comply with data protection (GDPR) legislation, NCHA will not discuss any aspect of a tenant's tenancy (other than the basic reporting of a repair) without the explicit consent of the tenant. This consent can be provided verbally over the phone if they wish another person to speak to NCHA on their behalf – for instance to interpret into another language or where a tenant simply wants another person to discuss an issue on their behalf.
- 12.3 Where a tenant is not able to give verbal consent on each occasion they need another person/advocate to discuss an issue with NCHA, or wish to set up a longer term informal advocate – for instance, if they do not have access to a telephone during normal working hours, the tenant and the advocate must complete an Informal Advocate form. (see Appendix 2 – Informal Advocate form) Informal advocate forms should be processed by the Estates Officer and details including a pass word for security purposes recorded.)
- 12.4 Tenants may appoint an Informal Advocate to liaise with NCHA on either or all of Maintenance, Income or Tenancy issues. Staff must check on the Key Information screen that the advocate has been given consent by the tenant to speak to NCHA about the issue in hand.
- 12.5 Tenants and advocates must be aware that whilst an informal advocate can speak to and liaise with NCHA on behalf of the tenant, they are not empowered to make decisions on behalf of the tenant and any decision relating to care or the conduct or termination of the tenancy must be made by the tenant. Where a tenant needs an advocate to make legal, or decisions relating to money, property or care on their behalf, they should appoint a Power of Attorney with the appropriate powers. Where a tenant lacks the capacity to make decisions for themselves, a deputy of the Court of Protection should be appointed.
- 12.6 The details of the informal advocate and a password to ensure security must be recorded as a contact detail attribute on Capita which will appear on the Key Information screen. Tenants should inform NCHA immediately if they no longer want an informal advocate to deal with maintenance, rent or tenancy issues on their behalf and the appointment of informal advocates must be reviewed and confirmed annually. For security purposes, it is also good practice to update advocate passwords. Where annual confirmation of appointment is not confirmed, the details of the informal advocate must be removed.
- 12.7 Any decisions made by an advocate must be recorded on a Capita diary entry and include details of the tenant's confirmation that they have given their authorisation for the decision/action/agreement made.

13. Power of Attorney and Court of Protection

- 13.1 Where a customer needs an advocate to make formal legal decisions about their tenancy or their short term or long term care they should appoint a single/joint Power of Attorney (Ordinary (time limited) or Lasting/Enduring) which will state the powers awarded (Personal Welfare and/or Money and Property). The customer or Power of Attorney/Court of Protection Deputy should complete the NCHA Power of Attorney/Court of Protection Deputy form (Appendix 3) and provide a copy of the document for NCHA's records.

- 13.2 Details of the power of attorney, including any expiry date, powers awarded, specific limitations and security password should be recorded as an attribute on the Key information screen. A copy of the Power of Attorney document should be scanned to the Tenancy Folder on the W drive.
- 13.3 Whilst NCHA will note the date of expiry of an Ordinary Power of Attorney and review the Power of Attorney at the expiry date, it is the customer's responsibility to ensure that NCHA is informed if the Power of Attorney is terminated.
- 13.4 Where a customer lacks the capacity to make decisions for themselves and has not appointed a lasting or enduring Power of Attorney on their behalf, NCHA must only accept decisions with a legal impact on the tenancy by a person appointed as a deputy by the Court of Protection.
- 13.5 Court of Protection deputies are issued with a Court Order stating specifically what they can and cannot do and have a clear time limit. Court of Protection Deputies must also provide an annual report to the Office of the Public Guardian explaining the decisions that they have made.
- 13.6 The expiry date of the deputyship should be recorded on the Court of Protection deputy attribute and include details of the powers awarded (Money & Property/Health and Welfare – or both). A copy of the appointment should also be scanned to the Tenancy Folder on the W drive.
- 13.7 Power of Attorney with an end date and Court of Protection documents should be reviewed annually by the Estates team to ensure that documents are still current and the customer and or Power of Attorney/Deputy to request a renewal of the document.

14. Security

- 14.1 Powers of Attorney and Court of Protection deputies should identify a password which should be recorded on the Capita attribute viewable in the Key Information screen. Passwords should be updated annually in order to ensure levels of security are maintained.
- 14.2 Where a member of staff has any concerns about the conduct of an informal advocate/attorney or deputy, they must consult the NCHA Safeguarding Adults Policy for further information on the immediate actions that should be taken to protect the interests of the customer and contact the Office of the Public Guardian with regard to the actions of a registered Power of Attorney or appointed Deputy.
- 14.3 Confirmation of any actions taken by NCHA through an advocate will be conveyed to them in their preferred option of communication and confirmed in writing to the advocate and the supported Customer. Any communications with the advocate should be recorded as a Capita Openhousing Diary Entry and written communications saved on the customer's electronic W drive file linked to the Capita Openhousing system.

15. Working with supported customers

- 15.1 Staff will be trained to view and use Supported Customer information using the Key information screen. This screen can be viewed by staff using any part of the Capita Open Housing system and will give staff the information they need to provide personalised support and adapt services to meet the needs of customers.
- 15.2 The appropriate level of support provided should be determined by the member of staff taking into account the support needs of the customer, the risk of tenancy failure and current management issues with the tenancy. Further advice and support should be provided by line managers where appropriate.
- 15.3 Supported customers will be asked to identify their preferred form of communication with the Association.
- 15.4 Staff will normally use telephone contact with supported customers when initially discussing all day to day business.
- 15.5 Staff will normally meet with customers to discuss larger issues rather than dealing with them by correspondence.
- 15.6 Where written correspondence is necessary it will be produced in plain English, with the needs of supported customers in mind, printed in large print if required or will be translated into the appropriate language. Braille or audio will be produced where this is considered a 'reasonable adjustment' to meet the needs of the customer (See DDA definition of 'reasonable adjustment').
- 15.7 Supported customers will have the option to use Informal Advocates/Power of Attorney/Court of Protection deputy to assist them/act or take decisions on their behalf, in their day to day business with the Association. Please see the Advocates above for more information.
- 15.8 Where the customer is supported by a statutory or voluntary agency, NCHA staff will work closely with the support worker(s) and will attempt to foster an effective working relationship at all times. When a support worker is acting on behalf of a customer when dealing with NCHA business, the customer should confirm their consent as a minimum over the telephone before each discussion takes place. However, if the customer is not available or able to give approval on each occasion, the support worker should complete an 'Informal Advocate' form.
- 15.9 Confirmation of any significant or agreed actions taken by NCHA through a support worker, informal advocate etc should be conveyed to the customer in their preferred method of communication and confirmed in writing to the support worker/advocate etc. Any communications with the advocate should be recorded as a Capita Openhousing diary entry and written communications saved in the appropriate folder on the tenancy W drive.

16. Pre & existing tenancy work

- 16.1 NCHA will identify customers who will require support at the point of registration, as part of the pre-tenancy assessment, as part of the tenancy visit process or at any point during the tenancy as identified by the customer, support worker or informal advocate.

- 16.2 Where a customer is identified/identifies themselves as requiring support at the pre-tenancy assessment, the Lettings officer should consider the ability of the customer to maintain a tenancy with the support that will be available to them.
- 16.3 If there is a concern about the customer's ability to maintain their tenancy, the Allocations Officer should consult the Allocations Service Manager before a final decision is made to offer a tenancy. If a decision not to make an offer is made, the reasons for the decision should be recorded on the offer paperwork and on the offer information on the relevant Choice Based Lettings Scheme/Capita.
- 16.4 For existing customers not currently identified as supported customers, Estates and Income staff will be responsible for identifying and discussing the completion of the Supported Customers form with existing customers who may be considered to meet the Supported Customer criteria. The Supported Customer form should be completed during any visits or face to face contact with regard to income and tenancy issues.
- 16.5 In addition staff should verify information and provide advice about other sources of support for supported customers during standard tenancy visits.
- 16.6 Where an individual is moving on from a supported living environment the Allocations Officer will liaise with the Project Worker to interview the customer and, where possible, arrange for ongoing support to be provided from the first day of the tenancy. Staff should also work with other support providers and NCHA tenancy support staff to maximise benefit and other income, manage debt and investigate sources of furniture and furnishings required to help customer's settle in and build a sustainable tenancy.

17. Tenancy Sustainment

- 17.1 The Tenancy Support Officer or Estate Officer/Estate Assistant will normally make initial contact with Supported Customer within 2 weeks of the commencement of their tenancy and certainly by the 4 week tenancy visit. Where a customer is referred during their tenancy, the Tenancy Support Officer should contact the customer within 4 weeks.
- 17.2 The Tenancy Support Officer, Estate and Income Officers will provide practical support and use their judgement to adjust the service that they provide they provide and/or in the implementation of standard NCHA policies and procedures to meet the needs of the Supported Customer and help to sustain their tenancy.
- 17.3 Where it is not possible to provide the appropriate level of expertise or resources required to support the customer during their tenancy, staff should sign-post/referring the Supported Customer to agencies in order to obtain the resources and services they need.

18. Support for People with a disability

- 18.1 If a customer or a member of a customer's household has a disability, NCHA will offer help in two ways. Firstly, NCHA can install minor aids and adaptations such as grab handles, stair hand rails, lowered door thresholds and over bath showers up to the value of £1000 on the request of a customer, Estate officer or Local

Authority Occupational Health Service. Adaptations may also be made to meet the needs of all disabled customers. Adaptations may also be requested to meet the needs of customers and members of their household with a range of physical, learning and other disabilities.

- 18.2 NCHA will undertake adaptations for older customers to make properties more 'age friendly' and suitable for customers experiencing dementia symptoms. Adaptations may include kitchen adaptations and colour schemes designed to help people with dementia symptoms continue to live independently in their own homes.
- 18.3 Full details of this service can be obtained from the NCHA Disability Champion and the Adaptations Procedure. Please contact the Customer Contract and Rents Service Manager to discuss this further.
- 18.4 If the customer's existing home cannot reasonably be adapted to meet the needs arising from the disability, they may be considered for a transfer to a more suitable property or given assistance and support with other housing options through local Choice Based Lettings schemes.

19. Support in relation to maintenance issues

- 19.1 NCHA's Property Services department will liaise with Affordable and Social Housing staff to help identify supported customers who require additional support.
- 19.2 Property Services staff should check the supported customer attributes recorded on Capita and adjust the services that they provide accordingly. Examples may include ensuring that communication is in the appropriate format and that the customer is given the support they need in order to communicate effectively with NCHA, arranging for repair jobs which would normally be regarded as a customer's responsibility, organising convenient appointment times and ensuring that staff and contractors can meet the specific needs of a supported customer.
- 19.3 Property Services staff with the appropriate forms and will work with their colleagues in Housing Services to help identify customers in need of support and to make sure that they are treated appropriately in line with the terms of this policy.

20. Reviewing the Supported Customers Policy

- 20.1 A review of this Policy document will be carried out every 3 years in consultation with customers.

Appendix 1

NCHA Supported Customer Form:



Contact details:

Tenant 1:	
Tenant 2:	

Please give the names of any other occupants of your property who have additional support needs:

Occupant 1:	
Occupant 2:	
Occupant 3:	
Occupant 4:	

Address of new property:		
Contact numbers	1	2

Support needs Attributes:

Support need type	Attribute	Name	Date recorded/last updated
Supported Customer/Vulnerability Attribute	VA – Supported Customer recorded on Capita		
Young Person:	Young person aged 16 - 25		
Care leaver/Supported accommodation	Care Leaver/Leaving supported accommodation		
Ex Prisoner	Former prisoner		
Sensory Impairment	Deaf/Hearing Impairment		

Support need type	Attribute	Name	Date recorded/last updated
Domestic Violence	Survivor of Domestic violence		
Sensory Impairment	Registered Blind/Partially Sighted		
Poor Long Term Health	Poor Health/Physically Frail		
Physical disability	Wheelchair User/Mobility Scooter User		
Physical Disability	Physical/Mobility Impairment		
Learning Disability	General Learning Disability		
Learning Disability	Autistic Spectrum Disorder		
Mental Health Condition	Mental Health Condition		
Substance misuse	Substance misuse		

Communication/Service Delivery attributes:

Communication / Service Delivery Need	Attribute	Name	Date recorded/Last updated
Communication/Service Delivery Need	CSDN - Phone Only		
Communication/Service Delivery Need	CSDN - Letter Only		
Communication/Service Delivery Need	CSDN - Email Only		

Communication / Service Delivery Need	Attribute	Name	Date recorded/Last updated
Communication/Service Delivery Need	CSDN - Text Only		
Communication/Service Delivery Need	CSDN - Needs support to interpret written communication		
Communication/Service Delivery Need	CSDN - Large Print required		
Communication/Service Delivery Need	CSDN - Braille required		
Communication/Service Delivery Need	CSDN - Uses Text phone		
Communication/Service Delivery Need	CSDN - Uses Sign Language		
Communication/Service Delivery Need	CSDN - Uses Hearing Loop		
Communication/Service Delivery Need	CSDN - Speech Difficulty		
Communication/Service Delivery Need	CSDN - English as a Second Language		
Communication/Service Delivery Need	CSDN - Poor understanding of English		
Communication/Service Delivery Need	CSDN - Requires Translator		
Communication/Service Delivery Need	CSDN - Requires Translation of Written Communication		
Communication/Service Delivery Need	CSDN - Advocate – Maintenance only		
Communication/Service Delivery Need	CSDN - Advocate – Income only		
Communication/Service Delivery Need	CSDN - Advocate – Tenancy only		
Communication/Service Delivery Need	CSDN - Advocate – Power of Attorney		
Communication/Service Delivery Need	CSDN - Advocate – Court of Protection Deputy		

Communication / Service Delivery Need	Attribute	Name	Date recorded/Last updated
Communication/Service Delivery Need	CSDN - Appointment Necessary		
Communication/Service Delivery Need	CSDN - Needs Time to answer when contacted		
Communication/Service Delivery Need	CSDN - Make contact before sending written communication		
Communication/Service Delivery Need	CSDN - Visit in Pairs only		
Communication/Service Delivery Need	CSDN - DO NOT VISIT		
Communication/Service Delivery Need	CSDN - Support Worker		
Communication/Service Delivery Need	CSDN - Social Worker		
Communication/Service Delivery Need	CSDN - Probation Worker		
Communication/Service Delivery Need	CSDN - Tenant in Hospital		
Communication/Service Delivery Need	CSDN - Requires support to manage benefit claims		
Communication/Service Delivery Need	CSDN - Requires support to manage money		

Universal Credit Support Attributes:

Universal Credit Vulnerability	Level 2 Attribute	Date Recorded / Last updated
Universal Credit Vulnerability	UCV - Tier 1	
Universal Credit Vulnerability	UCV - Tier 2	
Universal Credit Vulnerability	UCV - Budgeting Skills	
Universal Credit Vulnerability	UCV - Bank Account Type	
Universal Credit Vulnerability	UCV - Digital Access	
Universal Credit Vulnerability	UCV – Vulnerability	

Advocate nomination form

Please complete this form to confirm the details where you wish to give permission to a friend, family member or support worker to act as your 'general advocate'.

The form gives NCHA permission to talk to your advocate on your behalf, about matters relating to your tenancy in any or all of the following areas:

- Maintenance (including reporting repairs & arranging appointments)
- Income (including discussing payments & benefit claims)
- Tenancy (including discussing general tenancy and service provision issues)

You can choose to nominate one or more people to act as a general advocate.

Notes & limitations:

1. The powers granted by this agreement to the general advocate are limited and do not include decisions which will have a legal impact on the tenancy. Where a customer needs an advocate to make legal decisions, a Power of Attorney - Ordinary, Enduring or Lasting must be in place and registered with NCHA. If the customer has not registered a Power of Attorney and now lacks the capacity to make decisions a Court of Protection Deputy should be appointed (This action can be completed through our Power of attorney form).
2. All advocates acting on behalf of a customer MUST ensure that they have the full agreement of the customer for any decisions made and MUST NOT continue to act on behalf of the customer in the event that this advocacy agreement is ended by the customer. Customers should inform NCHA as soon as possible of any decision to end this agreement.
3. All advocates must provide a password (that has been chosen by the customer) before acting on behalf of the customer.
4. The permission granted to act as an advocate must be reviewed annually. Any informal advocate permissions not renewed after a year will be removed from our system.

NCHA: Informal Advocate nomination

Customer Name 1:

Customer Name 2:

Address:

Post Code:

Email:

Telephone:

Agreed Password 1:

Agreed Password 2:

Password reminder:

Password reminder:

Form of Advocacy

I give permission for my advocate to discuss the following (tick all the apply):

Maintenance

Income

Tenancy

Advocate details:

Advocate 1:

Advocate 2:

Name:

Name:

Organisation:

Organisation:

Address:

Address:

Post Code:

Post Code:

Telephone:

Telephone:

Email:

Email:

Acceptance:

I confirm that I am prepared to act as an Informal Advocate in the areas specified above. I understand and accept the notes and limitations stated above.

Advocate 1 signature:

Date:

Advocate 2 signature:

Date:

I confirm that I give consent for the above persons to act as Informal Advocates. I understand and accept the notes and limitations stated above.

Tenant 1 signature:

Date:

Tenant 2 signature:

Date:

NCHA Power of Attorney/Court of Protection deputy Nomination

Customer Name 1:	
Customer Name 2:	

Ordinary Power of Attorney				
Date issued		End date		
Single	Joint	Copy provided	Yes	No
Power of Attorney (Lasting or Enduring)				
Date issued		End date		
Single	Joint	Copy provided	Yes	No
Personal Welfare		Property & Financial		
Court of Protection deputy				
Date issued		End date		
Single	Joint	Copy provided	Yes	No
Health & Welfare		Money & Property		

Power of Attorney/Court of Protection Deputy details:

Attorney/Deputy 1 :	Attorney/Deputy 2:
Name	Name
Address	Address
Post code	Post code
Email	Email
Password:	Password
Signed (Attorney/Deputy)	Signed (Attorney/Deputy)
Signed (Tenant 1*)	Signed (Tenant 2*)

* Tenant to sign unless tenant lacks capacity.

Power of Attorney/Court of Protection Advocate nomination

Please complete this form where a Power of Attorney (Ordinary, Enduring or Lasting) or Deputy of the Court of Protection has been appointed.

The form confirms the authority of the attorney/deputy to act and take decisions on the tenants' behalf, and ensures that NCHA has a complete record of the details of Power of Attorney/Court of Protection appointments and powers included.

The form also records contact and security details for persons appointed Power of Attorney or Court of Protection deputy.

Notes & limitations:

1. All persons holding Power of Attorney or appointed Deputy of the Court of Protection deputy must ensure that they are acting within the powers conferred and that the order is fully valid.
2. A copy of Power of Attorney/Court of Protection deputy must be provided to NCHA. This document will be scanned and held on file.
3. All persons holding Power of Attorney/Court of Protection Deputies must provide a password before acting on behalf of the tenant/customer.
4. Power of Attorney/Court of Protection deputy appointments should be reviewed annually to ensure that orders remain valid.