

Knowing Our Customers Policy



1. Introduction

- 1.1 Warrington Housing Association (WHA) is keen to ensure we deliver services which meets customer needs and expectations. Our aim is to ensure we deliver exceptional core services which prioritise the needs of our customers. This policy sets out our commitment to assisting all our customers and residents to ensure they can access our services, and ensure they receive the assistance they need to sustain their tenancy.
- 1.2 WHA provides additional support and responds flexibly to customers who are facing exceptional circumstances that can make them more vulnerable and unable to cope and manage their tenancy. We know there is more we can do, particularly in ensuring we are consistent in our approach by providing our colleagues with the information, understanding and tools to respond appropriately to our residents' needs. This policy sets out the steps we will take to achieve this.
- 1.3 An Equalities Impact Assessment has been carried out for this policy and we found that we need to continue to ensure we have up to date and accurate data about our customers to give assurance that we are providing support and assistance where needed, adapting services which meet customer needs and not discriminating against customers or prospective customers.
- 1.4 This policy applies to all residents. Our aim is to embed an understanding of, and response to, residents' additional needs and circumstances throughout our work.

2 Definitions and Legal Context

2.1 Legal and Policy Context

Equalities Act 2010

This is the legislation in place to protect people from discrimination in the workplace and in wider society. The Act includes the Public Sector Equality Duty (PSED), which applies to public authorities and other organisations carrying out public functions. The PSED means that decision makers have to; have due

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regard to eliminating conduct such as harassment, discrimination and victimisation; advance equality of opportunity; and foster good relations.

2.2 Regulator of Social Housing, Consumer Regulations

There are numerous aspects of the Consumer Regulations, which came into force in April 2024, that relate to this policy. These include the need to take action to deliver fair and equitable outcomes for tenants. This means that landlords have to understand the needs of their tenants, make sure communication is clear and accessible, ensure services are accessible, and allow tenants to be supported by a representative or advocate.

2.3 Care Act 2014

The Care Act describes local authorities' duties towards people who require care and support. The Act also specifies how people will be assessed for support needs, and creates a legal framework for how organisations must work together in respect of safeguarding.

2.4 Human Rights Act 1998

The Human Rights Act puts into law the European Convention on Human Rights. The Act protects everybody's rights to life in a number of areas, including privacy and family life, personal liberty, and freedom to religion or belief.

2.5 Housing Ombudsman Reports

The Ombudsman's spotlight reports Attitudes, Right and Respect and Knowledge and Information Management, have been key in both identifying the need for this policy, and on the content.

2.6 Definitions

Vulnerability

This is a term which can have many different meanings. We have chosen to use the same definition as the Housing Ombudsman, that vulnerability is: "A dynamic state which arises from a combination of a resident's personal circumstances, characteristics and their housing complaint. Vulnerability may be exacerbated when a social landlord or the Housing Ombudsman Service does not act with appropriate levels of care when dealing with a resident's complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced".

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Feedback from residents and colleagues shows that not everyone is comfortable being described as “vulnerable”. We will try to make sure we use the most appropriate language for each individual person.

Protected Characteristics

According to the Equality Act 2010, it is against the law to discriminate against someone because of a protected characteristic:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Discrimination

There are four main types of discrimination:

- Direct discrimination. This means treating someone differently because of a protected characteristic. An example of this might be only sharing a promotion opportunity with male members of staff, even though there is no legitimate reason to limit the role to men.
- Indirect discrimination. This is where an organisation’s ways of doing things have a worse impact on one group of people than another. An example might be where an organisation holds an engagement event in a venue which is not accessible to wheelchair users.
- Harassment. This means treating someone in a way which violates their dignity, creates a hostile, degrading, humiliating or offensive environment. For example, making abusive comments to somebody because of their religion.
- Victimisation. This means treating somebody unfairly because they are taking action under the Equality Act or supporting somebody else to do so. For example, dismissing an employee because they make a complaint about sexual harassment at work.

3. Policy Statement

3.1 Why do we need to understand our residents and their needs?

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Both the Housing Ombudsman and the Regulator of Social Housing (RSH) have highlighted the need for registered providers to understand the needs of residents.

The RSH Consumer Standards Code of Practice is clear that the diverse needs of tenants should be taken into account in the housing and landlord services they provide; this includes how they communicate with tenants, assess vulnerability to anti-social behaviour, and how they prioritise repairs.

Section 31 of the RSH Consumer Standards Code of Practice says – “31 – Registered providers are expected to have robust information about their tenants so that they can deliver fair and equitable outcomes for tenants in relation to the housing and landlord services they provide. This should include, but not be limited to, relevant information on protected characteristics, and any support or communication needs”.

The Housing Ombudsman has highlighted the need to understand and respond to the needs and circumstances of tenants. The Ombudsman has also raised the importance of holding and acting upon accurate knowledge and information, and this includes information about tenants with vulnerabilities.

3.2 What sorts of needs might be relevant?

There are many issues tenants face which may be relevant for landlords to understand when carrying out their duties:

- Mental health
- Disability or health condition
- Bereavement
- Financial Hardship / Poverty
- Domestic violence
- Old age
- Difficulty accessing understanding communications, which may be caused by a number of issues including; visual impairment, hearing impairment, language barriers or a learning disability.

3.3 There are a number of opportunities to identify that a tenant is facing issues or circumstance which mean they need extra help:

- At the initial application for housing.

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- During the sign up and new tenancy process.
- Through tenant surveys or visits.
- When a member of staff has contact with the tenant during their tenancy. For example, when the tenant contacts us to report an issue.
- When a contractor has contact with the tenant.
- Via a referral from another organisation (such as a support agency).

4. Recording and managing the data

4.1 We will always collect, process and store personal data in line with data protection rules. This includes sensitive personal data, which would include information which could be relevant to this policy, such as health data.

When a resident lets us know that they are affected by a relevant issue or circumstances, we will record this information in our Housing Management System. We will update or remove this information when we are made aware that things have changed, or the information is no longer relevant.

4.2 What support can residents expect?

We recognise that the challenges tenants face may be complex, and that as a landlord, we may not have the power or responsibility to affect all of the changes needed. What we aim to do, however, is to recognise the role that housing has as part of the whole “system” of factors impacting on the resident, and to take action within our remit to support where we can.

While the offer of support may vary in line with a resident’s needs, some examples of what help could be offered are:

4.3 Communication

As far as reasonably practicably practical, we will adjust our communication with residents if they let us know of a communication need, for example:

- Calling ahead before an operative attends a residents’ home.
- Giving a resident more time to answer the door if they need it.
- Providing information in a format which suits the resident’s communication needs.
- Letting residents know if we need to change our appointment or if we are running late

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- Making sure that staff and contractors introduce themselves when they are working in residents' homes, especially where a resident has a visual impairment.

4.3.1 As well as ensuring we communicate effectively with residents; we will make sure that we communicate clearly and effectively between different teams and colleagues within our organisation. It is important that if one part of our organisation is made aware of a residents' needs, this information is available to other parts of the organisation who need to know.

4.4 Repairs

We will make sure that any issues we are aware of are taken into account when arranging repairs. For example:

- We may prioritise repairs for residents' issues or circumstances and increase the urgency.
- We will ensure that operatives are aware of any additional needs residents have when arranging to attend a home. We will also make sure that operatives record and/or report any issues the resident makes them aware of.
- We will ensure that colleagues and contractors treat residents with dignity and respect, including introducing themselves when they arrive at the appointment.

4.5 Rent Arrears

We will make sure that our we provide additional support to help customers sustain their tenancy.

4.6 Aids and Adaptions

We have a policy in place to support residents who require aids and adaptions to their home due to age or a disability.

4.7 Other areas

There are some other areas of our work where we may need to take residents' individual needs;

- Anti-social behaviour
- Complaint Handling
- Fire Safety
- Rent collection

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5. Consultation and Engagement

The policy has been developed in partnership with the Community Housing Partnership. The CHP tenant panel and tenant conference were engaged at an early stage of the development of this policy, and their views have been key in shaping it.

6. Implementation

To implement the requirements of this policy, we will ensure that:

- Our systems are capable of recording and storing data about residents' relevant needs, conditions or circumstances.
- Our colleagues are trained in recording and keeping accurate records.
- Third party organisations we deal with, such as contractors, will report any issues or potential issues to us.
- Our colleagues who deal with residents receive a range of training and information relating to the different issues residents might be facing.

7. Monitoring, Review and Reporting

The Head of Housing and Customer Services will be responsible for reviewing and monitoring this policy to ensure that it meets legal and regulatory requirements and reflects best practice

The policy will be reviewed on a 3-year cycle or as required in the context of regulatory, legislative change or best practice.

8. Equality, Diversity and Inclusion

Warrington Housing Association has carried out an equalities impact assessment to make sure that the policy is in line with our duties under the Equalities Act 2010.

The equalities impact assessment highlighted that we need to ensure we are continuing to build the data we hold about our customers so we can demonstrate that we are shaping services to meet customer needs and no customer is adversely impacted by how we deliver our service.

9. Data Protection

In implementing this policy, all staff and contractors must adhere to the Warrington Housing Association's Data Protection Policy and the General Data Protection Regulation.

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The nature of the policy means that WHA will process personal data relating to residents, and this may sometimes include sensitive personal data.

In respect of this policy, this has a number of specific implications:

1. Processed lawfully, fairly, and in a transparent manner relating to individuals.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Accurate and, where necessary, kept up to date;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
 - We will only collect personal data where we have a lawful basis for doing so.
 - We will keep personal data about residents up to date as far as reasonably possible.
 - We will only use data for the purposes we collected it.
 - We will store personal data securely.
 - We will only share personal data in line with our data sharing policies.

10. Accessibility

All information will be available in a variety of formats to ensure that it is:

- In a readable typeface and print size – our website includes details of how to change settings for those with visual impairment.
- Translated where appropriate – our website includes Google translate.
- Available upon request in formats suitable for customers with specific communication needs e.g. picture format, electronic for use with screen readers.

If you require any help to understand or access this document, you can contact us by:

Calling us on 01925 246810

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Emailing us admin@wha.org.uk

Speaking to any WHA colleague

Visiting our office at the Gateway, 89 Sankey Street Warrington WA1 1SR

II. Related Policies

This policy should also be read in conjunction with a range of other policies and procedures. This includes, but is not limited to:

- i. WHA 0090 - Equality, Diversity and Inclusion Policy
- ii. WHA 0127 - General Data Protection Regulations Policy

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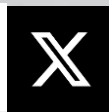
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