

South Tyneside Council's Housing Company

Inclusive Services Policy January 2023

Lead officer:	Nyomi Winter
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EIA completed:	Yes
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Updates	Minor update made May 2023 to
	appendix 2 to reflect changes to how
	staff access interpreting services.

1. Introduction

As part of our approach to ensuring that everyone is given the same opportunities to achieve the same or similar outcomes, we want to make sure that all people, including those who are vulnerable or who have additional needs, can access and experience our services in a fair and accessible manner.

This policy is aligned to our Equality, Diversity and Inclusion <u>Policy</u> and <u>Strategy</u> that sets out our commitment to equality, diversity and inclusion (EDI) as an employer and as a provider of services to tenants and residents in South Tyneside.

2. Legislative context

South Tyneside Homes (STH) must comply with the Equality Act 2010 which legally protects people from discrimination in the workplace and in wider society. We want to ensure that our customers are not disadvantaged because of their protected characteristics of:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race this includes ethnic or national origins, colour or nationality
- Religion or belief (or lack of belief)
- Sex
- Sexual orientation.

3. Our commitment and aims

We aim to create an inclusive environment and ensure that all customers have equal access to our services and that everyone experiences the high levels of services that we provide to tenants and homeowners. We will deliver services in a way that meets the needs of our customers.

We are committed to accommodating all reasonable requests to meet the needs of individual customers as far as possible. This means identifying and understanding individual needs and tailoring services as far as is reasonably practicable by offering choices and options to respect dignity and create independence.

4. Our approach and implementation

We consider that the essential factors in inclusive services are:

- A commitment to meeting best practice standards for access and inclusion.
- A choice of access method for customers to meet their unique needs.
- A proactive approach to recording and reviewing additional needs.
- Appropriate support and signposting targeted to the customer's needs (some examples are given below in appendix one but we will be using this to develop a dynamic Inclusive Hub for our staff on our Intranet)
- A commitment to try to help resolve problems at first point of contact where possible.
- Accurate recording of personal information, establishing follow-up procedures.
 and early investigation of non-compliance.
- Appropriate data-sharing to improve customer service.
- A commitment to ensure all our premises and facilities are accessible.

The way we will deliver this policy is by maintaining accurate and up to date records of customers who are vulnerable, need additional assistance or have specific communication needs. This will help us adapt our services to meet individual needs by fast-tracking or tailoring our approach to ensure equality of opportunity and respect dignity. We will encourage our employees to use this information when seeking to communicate or engage with customers.

We will be guided by each person or household about what we can do to meet their specific needs so that all residents can stay safe, warm, independent and have an equally good experience of the service we provide.

When vulnerabilities are identified, we will seek specific information from customers and use this for delivering services and for monitoring purposes.

Such information will be treated in confidence and in line with South Tyneside Homes' Privacy Notice. The information will not be shared with anyone else who does not need it.

The information will be checked with the customer or household members and kept updated. When someone is no longer deemed to be vulnerable, we will update the information in our records. Customers will also be encouraged to inform us should there be a change in their circumstances.

We recognise that sometimes customers may not want to engage with us and in some circumstances, we may need to be pro-active in the outreach we do to actively seek feedback where necessary and appropriate. However, customers may not feel comfortable sharing certain personal information with us, and they should never be pressured by staff to do so.

Initially, the implementation of this policy will require a company wide cross service project to be delivered whereby we review and update our current customer information. This project will be called the Inclusive Services Project as identified in the EDI Strategy 2022. Due to the breadth of the Inclusive Services Project, it currently has a projected completion date of March 2024. The Inclusive Services Project will also require training be provided for our staff.

5. Additional needs or vulnerabilities

Our overall approach is to treat people fairly, with respect and in an inclusive way.

The Guide for Staff table in **appendix one** sets out examples of the most common circumstances that will require us to consider the provision of services and possible methods for tailoring our services. **Please note this is not exhaustive** but is meant to provide some suggestions staff can consider.

There are some obvious categories of consumer who are more likely to be vulnerable, such as elderly people, those with learning difficulties and people with physical disabilities. However, any one of us could become vulnerable due to a change in personal circumstances.

We know that people can be vulnerable in a variety of ways, sometimes for short periods and others can remain vulnerable for longer periods. We will deal with each case on merit. Losing a job, bereavement, developing a medical condition, dealing with addiction or struggling with literacy and numeracy; there are many reasons why someone might become temporarily or permanently susceptible to financial problems, or less able to make informed decisions.

The Child Poverty Action Group's Fuel rights handbook notes that a vulnerable customer is likely to be in receipt of one of the following benefits:

- Retirement Pension
- Pension Credit
- Disability Living Allowance / Personal Independence Payment
- Attendance Allowance
- Long-term Incapacity Benefit
- Employment and Support Allowance
- Income Support
- Income Support with disability premium
- Income-based Jobseeker's Allowance
- Universal Credit

The National Standards for Enforcement Agents guidance issued by the Ministry of Justice provides guidance on who can be considered vulnerable and this includes:

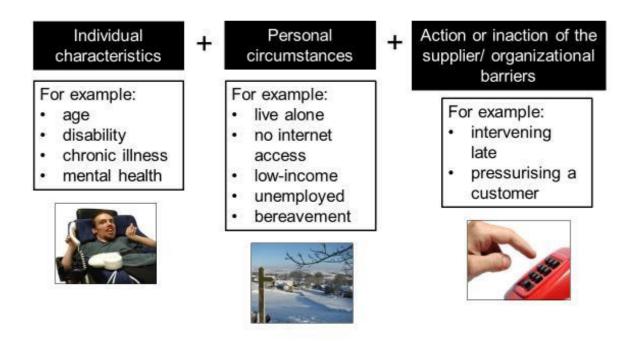
- The recently bereaved
- Single parent families
- Pregnant women and people
- Unemployed people
- Those who have obvious difficulty in understanding, speaking or reading English

Ofgem talks about identifying 'vulnerable situations', rather than 'vulnerable consumers'. A vulnerable situation, as defined by Ofgem, is the result of three intertwined factors – individual characteristics, personal circumstances and the action or inaction of the Company. This is explained in the image below.

Vulnerable Situations



A vulnerable situation is the result of three intertwined factors:



Staff should always check to see if a customer has any specific needs and ensure the service that we offer takes these needs in to account. Always check with the customer where possible and keep this information up to date. This is the cornerstone of helping us to provide excellent customer service.

The information in **appendix one** will be developed into a dynamic and constantly evolving Inclusion Hub for staff on our Intranet following the publication of this Policy. It is the intention that the Inclusion Hub will become a one stop shop for staff seeking to support customers and their diverse needs better.

6. Roles and responsibilities

The Inclusive Services Policy applies to everyone at STH, including the Board and employees, apprentices, volunteers, residents, service users and external partners with whom we work, such as contractors, consultants, and other agencies.

All managers are responsible for visible leadership, the overall implementation of the

policy and strategy, reporting performance and setting standards for exemplar behaviour and conduct. They are required to exercise operational leadership, demonstrate strong application of the policy in their area of work and model appropriate behaviour and conduct. They must:

- Ensure that their staff are familiar with this policy.
- Ensure staff are appropriately trained.
- Seek advice and guidance where necessary to implement the policy.
- Help to highlight policies and practices that could lead to discrimination and unfairness.
- Take speedy and appropriate action to deal with complaints/incidents indicating
 actual or potential breach of this policy. Actions must be taken in line with
 established practices, policies and procedures relating to STH's role as an
 employer and service provider.
- Support STH to collect, monitor and analyse data to highlight achievements and help to address shortfalls.

Employees, apprentices, agency staff, volunteers and contractors are responsible for familiarising themselves with and acting in line with this policy. They are encouraged to report actual or potential discrimination and negative consequences in a timely manner and in line with established policies and practices.

7. Monitoring and review

We will monitor the effectiveness of this policy by:

- Carrying out checks to see if our records of people with relevant needs are up to date.
- Reviewing satisfaction, complaints data and other feedback to check whether the policy is working as intended.
- Provide updates on the Inclusive Services Policy in practice in the annual equality, diversity and inclusion annual report.
- We will also look to work with customers to 'mystery shop' us to test whether
 we provide the information or service in for format they have requested,
 and/or survey customers who have specifically informed us of their
 vulnerability or needs to see if they received the service according to their

needs.

8. Communications

An internal and external communications plan will be created with the Communications and Marketing Specialist to raise awareness and understanding of this policy with both staff and customers. Relevant training for staff will also be explored.

9. Policy scope

This policy applies to all aspects of our work and functions as a landlord and service provider.

10. Involvement; value for money; and equality, diversity and inclusion

Staff and customers were consulted with in the development of this policy. A full equality impact assessment was completed. There are no value for money impacts arising from this Policy.

Appendix One:

Staff guidance on access requirements and possible adjustments

Vulnerability or additional needs	Possible adjustments/requirements
For all	Always establish and update a person's individual preferences and needs following contact.
	Ask people how they would like to be addressed.
	Ask the person if they need any help and, if so how this should be provided, listen to what they say and act accordingly.
	Be aware that some customers may be embarrassed or feel unable to disclose their needs. Be sensitive and do not pressure them.
	When preparing signage for events and meetings ensure it is large enough for everyone to see and the colour contrast between the text and the background is strong (e.g. Black/White, Yellow/Black, etc).
	When visiting people at home do not park on kerbs or in front of dropped kerbs where possible as these obstructions can be dangerous.
	Offer alternative ways to give views and opinions.
	If food is available at your event, check dietary requirements.
	If sending a letter, ensure the layout and content is clear and offer a contact for support.
	Write in clear plain English, Arial (no fancy or curly fonts). Ask people what font size they prefer where possible.
	Schedule appointments at times that best suits the customer where possible.
	Any occurrences of hate incidents or crimes should be reported here.

	Consider timings of meetings and events. Many people attend school, college, training, or work office hours. People may need to account for medical appointments.
Age	You may need to consider the advice from the physical and mental impairment as well as hearing and sight issue sections. Do not assume but check with the customer to see if they have any additional needs.
	Consider childcare issues that people might have. Check with the person or arrange a creche facility. It may encourage parents to attend.
	Consider communication methods that your target customers may respond too, for example, younger customers may be more digitally engaged.
Visually impaired/sight	Ask the individual what format of communication they prefer.
impaired (partially sighted) or severely impaired (blind)	Printed material in larger font size may be more accessible. Some visually impaired people prefer size 18/20, Arial Font. If document is handwritten use black ink pen not blue ink. Remember bigger, brighter, bolder.
	Key documents may need to be provided in audio format/braille. See details for arranging this via Language Line in appendix two below.
	 Key information should be provided verbally where possible. Telephone where possible.
	Consider information being in an electronic format that could be used by a screen reader or other computer aids. For example, PDFs cannot be read by people using screen readers.
	 May prefer information on audio tape, CD or assistive technology memory stick. Visually impaired customers may have Voiceover PC programs such as JAWS,

Dolphin or Zoom Text.

- Always identify yourself clearly and introduce anyone else who is present and explain they are in the room.
- When talking in a group, remember to say the name of the person to whom you are speaking.
- When meeting someone away from their home or workplace, ask what place they are familiar with and try to arrange to meet them there. It is important you arrive at the agreed time.
- When offering a seat, talk the person through the process (for example, 'the chair is on your right') and ask if it would be helpful for them for you to place the persons hand on the back or the arm of the chair, if required.
- At the end of the conversation, do not just leave, say when you are moving away.
- Always say what you want as gestures, such as nodding your head are not helpful.
- When help is needed on unfamiliar ground, say, "let me offer you my arm". This will enable you to guide rather than propel or lead the person.
- When in someone's home be careful of items left on the floor and ensure you explain to the resident about any obstructions, trip hazards or dangers they need to be aware of.

Hearing Impairments

- Communication preferences may include: fax, e-mail, text
 SMS message, letters, Relay UK. Text 'phone (minicom)
 benefits both hard of hearing and deaf people.
 Induction Loop benefits hard of hearing and some
 hearing aid users.
- Bear in mind that standard literature may be too complex for some deaf people to understand as English may not

be their first language. Some people have trouble with complex letters, keep messages in plain language and jargon free.

- Speak louder and more clearly.
- Ask people if they would like us to arrange the person if they require a British Sign Language (BSL)/English Interpreter, a Lip Reader Interpreter, or a Hearing Induction Loop. For details of how to arrange please see the end appendix.
- If an interpreter is present, remember to speak to the person and not the interpreter, keep eye contact with the person.
- Be responsive, nod rather than saying "mmmm!". Use facial expressions, gestures, and body language where appropriate. Only three out of ten words are actually 'read' from the lips.
- Don't be afraid to improvise and use signs that you think are appropriate. Remember Deaf people are used to communicating with hearing people who do not use sign language.
- If it is difficult to communicate, you can use written notes (but remember that English may not be the person's first language, keep language simple, jargon free, and clear).
- Do not assume that everyone who is Deaf or hearing impaired can lip read. If a person does lip read, remember lip reading is never totally reliable, many words look similar, use plain language, this takes a lot of concentration.
- Look directly at the person and speak clearly and slightly slower than usual, but do not shout or exaggerate lip movements when talking. Face the person and use good lighting. Keep hands, food and other items away from

your face when speaking.

• This PDF contains further information about deafness:



Introduction to Deafness.pdf

Physical impairments and mobility difficulties

- Offer home visits where possible.
- Allow extra time to provide access for home visits.
- Identify need for home adaptations or moving to more suitable accommodation if appropriate. See <u>'health and</u> housing support'.
- Offer a choice of appointments. Some disabled people
 may find it difficult to attend early appointments because
 of the time needed to get ready. Medical appointments
 made need to be considered.
- Ensure venues for meetings and events are accessible, have ramped access, accessible parking, toilets, and lifts if on upper floors.
- On posters and advertising ensure information is included about the support that those with mobility issues can get free of charge that helps to ensure everyone is able to attend meetings and events. This includes British Sign Language interpreters, transport, information in alternative formats and other languages, etc.
- Please be aware that some disabled people may require a
 personal assistant to assist them with things at a meeting or
 event. Check with the person before they attend and make
 appropriate arrangements for personal assistant to sit next
 to disabled people, order more refreshments, hold the
 meeting in a larger room, etc.
- STH use taxis for Involvement and Housing Options (if there is a crucial need). If transport is required establish

the type of taxi a person may need. This could be a saloon car, a wheelchair accessible taxi, etc. Please note some power chair users may need to use a particular taxi company as their chair may not fit in all wheelchair accessible taxis. Check with the person.

Things to consider when arranging meetings where people

- Things to consider when arranging meetings where people with mobility issues are attending:
 - o Are there suitable parking arrangements?
 - o Is there a ramp or step free access?
 - Is the width of doorways and aisles for wheelchair access-are they wide enough?
 - o Are there accessible toilets?
 - Is there a lift? (where necessary).
 - Does the person require a personal assistant to accompany them?
 - If there are potential access problems, notify the person and offer a home visit or alternative venue.
 - Provide a clear map with access points highlighted.
- Ensure you do not ask questions about a person's disability unless it is relevant, as this can cause offence.
- Don't lean on wheelchairs a wheelchair is part of the body space of the person using it.
- When visiting people at home do not park on kerbs or in front of dropped kerbs if possible as this may restrict access to the property or around the home/estate.
- Some disabled people have impairments which may not be visible or obvious. Be aware that people might want to sit down whilst talking to you.
- Be aware that some customers may be worried that they may have to pay for home adaptations.

Learning disabilities and literacy/numeracy issues/low level

- Consider Easy Read communication. More information about accessible communication formats can be <u>found</u> here.
- Offer oral communication where possible. Often

digital skills

communication is easier face-to-face.

- Consider preferences for liaison via carers/family/friends.
 Ask the person if they have an advocate or someone else that usually supports them during face-to-face contact.
- Consider arranging a 'password' for additional security to identify genuine callers such as repairs operatives.
- Black print on a light-yellow background may be best check with client.
- Use symbols, pictures, and photos where possible to illustrate points. Do not underline, use bold, and use bullet points/number.
- Always talk to the person as an adult.
- Do not assume that a person will be able to find their way to another point of advice. You may need to offer some extra support.
- It would be good to tell the person that you have a quiet place for interviews if they need it.
- When recommending or applying digital solutions for customers it is important to consider that they have both the access and that we aren't creating further barriers for them in the future.

Poor mental health

- Consider preferences for liaison via carers/family/friends.
- Consider arranging a 'password' for additional security to identify genuine callers such as repairs operatives.
- Some people with mental health issues may find it difficult to attend appointments at certain times of the day because of medication.
- Let the person know they can be supported or accompanied by a third party in any dealings. If this is requested, be flexible to ensure that the third party can also attend the appointment.

- Try to be flexible about making appointments. If someone
 is unwell, they may not be able to attend the meeting and
 another time should be offered.
- If someone is unwell, they can become anxious and/or confused. Be sensitive to the challenges the person is experiencing. If appropriate, ask if them if they would like to continue the meeting/ appointment at another time with a third party to support them.
- Ask the person where they would like a meeting/appointment to be held. Some people might be intimidated by having to go into an office environment.
 Other people might feel uncomfortable with strangers in their home.
- Ask the person what support, if any, they will need to attend the meeting/appointment.
- Be sensitive to someone's distress when they are unwell.
 For instance, many people can feel frightened and overwhelmed by appointments, forms, and any kind of financial management.
- Be aware that some people with mental health issues may find using public transport too overwhelming and may find receiving telephone calls stressful.

Living with/recovering from serious illness

- Identify need for home adaptations if appropriate. See 'health and housing support'.
- Consider that some people find it difficult to ask for help.
- Some people who are living with serious illness feel abandoned and don't know who to get help from. Others have reported feeling like they are 'passed from pillar to post'. Offer to arrange support where possible. If signposting, try to follow up with the customer where possible to make sure that they did get the support they required.

Speech impairments

- Encourage the person to use their own appropriate communication techniques comfortably and in their own time.
- Speak naturally and clearly to the person. Do not assume that they cannot hear or comprehend what you are saying. Maintain eye contact.
- Be patient do not attempt to hurry people with a speech impairment. This will only put more pressure on them and could make the problem worse. If necessary, make another appointment to meet.
- Never complete words, phrases, or sentences that they are having difficulty pronouncing.
- Always establish a person's individual preferences and needs once contact has been made and act on them wherever possible.
- Some people may prefer to be asked questions which need either a short answer, or a nod or shake of the head.
- Be sure you fully understand what the person means before acting or responding. Do not make assumptions. It may help to repeat what you have understood and check with the person that this is correct.
- Be sensitive to the size of teams and groupings. Those with a speech impairment can find large groups of people daunting.
- Provide a relaxed atmosphere where people can feel confident.
- If you are in noisy surroundings, take account of this, if possible, move to a quieter area.

Families with young children or

 Offer repairs appointments and home visits at times to avoid school runs if necessary and medical appointments

expectant parent	where possible. For example, the Repairs and Maintenance service offers a school run time slot for appointments of 10-2.
Non-English speakers	Offer of translation and interpreting services (staff see appendix for details of how).
	Never assume that if a person can speak English, they can fully understand everything you are saying or can read in English.
	Always use an interpreter for face-to-face interpreting do not rely on family members.
	Older people may have less understanding of English than younger people.
Religion and	Same sex or chaperoned interviews / visits if requested.
ethnicity	Make sure events are on a day, which most members of the community can attend (i.e., not a religious celebration or prayer day).
	If an event must be organised during a period of religious observance, make the reasons clear and if necessary, provide a quiet room for prayers.
	Do remove your shoes or put covers on if visiting someone at home.
	Don't enter a house/room unless you are invited, it may be a prayer room and you may be asked to take your shoes off.
	Contact local religious leaders, community projects, voluntary groups and other community contacts to help spread the word.
	If you're having an 'open event' consider also publicising it in local shops that members of the communities regularly use and invite all family members.
	Develop good relationships with community centers,

support organisations and other centers where community groups meet.

 This word document has a list of community organisations across South Tyneside that provide support to diverse groups.



- Be aware that it may not be the custom in some cultures to shake hands, especially among women.
- Be aware that an act of comfort, for example putting an arm around someone, may cause embarrassment or offence.
- Appreciate that cultural differences in body language exist and can cause misunderstanding, e.g. not looking people in the eye.
- Be aware that in some instances women may not like to be questioned by a man or that men and women may not attend meetings in the same room.
- Don't assume that not keeping eye contact in conversation is a sign of dishonesty or disrespect. In some communities the opposite applies.
- Communities often prefer to live in areas where there are
 other members of their community, cultural and religious
 facilities close by, and this becomes particularly important
 later in life. There is a need both to provide support to
 minority ethnic groups who wish to move away from
 established ethnic clusters and to widen housing options
 for those who want to stay.

Asylum seekers and refugees

 Many asylum seekers will have come from situations of conflict and persecution. Some may have been tortured.
 Therefore, they may be very suspicious or fearful of authority. Local government in places where they come from may be corrupt or oppressive. It is important to be clear that you are there to help them and give as much information as possible.

- New communities may have come from countries with almost no effective government. Wherever they have come from, it is important to realise that it will not have been the same as here. The way institutions work here such as the Council or Health Service are not always obvious. Make sure that everything is clearly explained: tell people which section of the Council can deal with which issue – do not assume that it will be obvious to everyone.
- Whilst they wait for a decision on their claim, asylum seekers face a life of anxiety and insecurity. They cannot plan for the future, because they do not know if they will be able to stay in the country or when they will find out.
 Decisions on asylum claims can take years. Even when they get a positive decision, many new communities may be very isolated. Please be sensitive and offer what support you can.
- Also consider advice in religion and ethnicity section where appropriate.

Women

- Same sex or chaperoned interviews / visits if requested.
- Avoid gender specific language. Such as 'he' to describe no-one in particular. For example, 'manning the phones, manpower, foreman, chairman, spokesman etc. Instead use gender neutral language such as they/them/person, covering the phones, workforce, chairperson, supervisor, spokesperson etc.
- Do not use inappropriate language. You may not intend to offend but many women find pet, love, darling, lass, ladies, and other terms unacceptable. If they ask you not

LGBTQ and gender reassignment	 to use this, please stop and offer an apology. Women, in particular, may have safety concerns when travelling to and from venues, particularly on an evening – check with the person to see if they have any concerns. LGBTQ people are at a higher risk of becoming homeless due to homophobia, biphopbia and transphobic attitudes. For example, young people may be thrown out of their home because of their sexual orientation. For our current approach to Homelessness, see section 3 of our Allocations Policy.
	If someone gives you their pro-nouns, please ensure they are used (he/she/they/them, his/hers/theirs etc).
Temporary vulnerability e.g. recently bereaved, life changing event, losing a job, developing a medical condition, victim of crime, extreme weather impacts, dealing with addiction etc	 Please use sensitivity with discussions around rent arrears and non-urgent repairs. See 'if you are having difficulty paying your rent'. Signpost/contact additional support teams where appropriate, for example the Welfare Support Team.
Carers	 Consider timings of meetings and events. Offer repairs appointments and home visits at times to avoid school runs and medical appointments where possible.

Appendix Two – For staff, Translation and Interpreting Service – Language Empire

Our translation and interpreting provider Language Empire offers a one-stop-shop translation service that staff can access and use throughout the Council. The translation service covers the following: face to face interpreting, telephone/video interpreting, written/braille translation. The services offered include both:

- **Planned appointments -** where officers know in advance that they will require an interpreter for a meeting/appointment and;
- On demand where officers require an interpreter over the telephone at short notice.

For Planned Appointments

To make things easier, we have now set up a generic pin number **68234089** and a blanket purchase order number which will be updated each financial year, so you will no longer be required to raise an order in Oracle.

When making a booking, please use the generic pin number listed above in the Purchase Order number field on the booking portal (this pin will be linked to the blanket purchase order number by STC Finance.)

To make a booking through the online booking portal you will require a username and password. If you do not have a username and password, please request one by e-mailing contract.management@empire-groupuk.com

To book, manage, track, or cancel a linguist request, please sign into Language Empire's online LE-LSM portal.

On Demand

For any unplanned appointments which may require an interpretation service over the telephone, we have set up a generic pin for employees to use.

Direct on-demand line: 0333 188 3731

Generic Homes PIN: 68234089

This line is for getting through to an interpreter directly in emergencies and cannot be used to answer queries or issue logins/PINs. If staff need any assistance with any services, even queries concerning the on-demand line, they can contact Language Empire's Customer Services Team on 0330 20 20 270.

You can also find helpful service support materials and additional information on the Language Empire Customer Hub, such as:

- How to Request Language Services
- On Demand Telephone Access Cards
- How to Request Translation Services
- Best Practice Guides for Using Interpreters
- Language ID Charts

Please contact the Corporate Business Team if there are any enquiries.

Please contact the Corporate Business Team if there are further areas of information that you would find helpful to be added to this document.