



# NEEDS AND RISK ASSESSMENT POLICY

Originator:	Policy and Strategy Team
Approval date:	12 <sup>th</sup> April 2022
Review date:	April 2025

1	Introduction
1.1	This Policy sets out Pine Court Housing Association's (PCHA) arrangements for undertaking needs and risk assessments with applicants for Independent Living Service.
1.2	Each applicant for Independent Living Service will be assessed against a criteria prior to the service being offered to them to ensure that they have housing related needs.
1.3	The delivery of the service between parties is governed by the Independent Living Service Agreement, which is complementary to the Tenancy Agreement.
1.4	In operating this Policy PCHA will comply with the following relevant legislation: <ul style="list-style-type: none"> <li>• The Mental Capacity Act 2005</li> <li>• Safeguarding Vulnerable Groups Act (SVGA) 2006</li> <li>• Care act 2014</li> </ul>
1.5	The Policy meets the following PCHA aims: <p>Providing quality homes and housing services</p> <ul style="list-style-type: none"> <li>• Promoting social, economic and cultural cohesion</li> <li>• Nurturing talented people, to achieve success</li> <li>• Working with partners to deliver more</li> </ul>
1.6	The application of this Policy ensures compliance with the outcomes of the Regulatory Framework for Social Housing in England as follows: <ul style="list-style-type: none"> <li>• provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards</li> <li>• treat all tenants with fairness and respect</li> </ul>

	<ul style="list-style-type: none"> <li>• demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs</li> <li>• Registered providers shall offer tenancies or terms of occupation which are compatible with the purpose of the accommodation, the needs of individual households, the sustainability of the community, and the efficient use of their housing stock</li> </ul> <p><b>1.7 Access and Communication</b></p> <p><b>1.7.1</b> PCHA is committed to ensuring that our services are accessible to everyone. PCHA will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for us or use our services.</p> <p><b>1.8 Equality, Diversity and Human Rights</b></p> <p><b>1.8.1</b> PCHA is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Expression, Sexual Orientation Marital Status, Pregnancy and Maternity, Religion and/or Belief.</p> <p><b>1.8.2</b> PCHA also recognise that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p> <p><b>1.8.3</b> PCHA will also ensure that all services and actions are delivered within the context of current Human Rights legislation. Staff and others with whom we work will adhere to the central principles of the Human Rights Act (1998).</p> <p><b>1.9</b> This Policy should be read in conjunction with the:</p> <ul style="list-style-type: none"> <li>• PCHA Safeguarding Adults Policy</li> <li>• PCHA Safeguarding Children Policy</li> <li>• PCHA Maintaining Professional Boundaries Policy</li> <li>• PCHA Staff Handbook</li> <li>• PCHA Confidential Reporting Policy</li> <li>• PCHA Independent Living Privacy Policy</li> </ul>
<b>2</b>	<b>Statement of intent</b>
<p><b>2.1</b></p> <p><b>2.2</b></p> <p><b>2.3</b></p>	<p>PCHA will comply with all relevant legislation, regulation and contractual obligations in all areas of work with regard to the implementation of this Policy.</p> <p>PCHA will take all reasonable and practical steps to deliver effective needs and risk assessment and will work with other agencies as appropriate to identify, mitigate and manage risk to ensure independence and choice for customers.</p> <p>PCHA will respond to needs promptly, sensitively, proportionately and consistently in line with the Independent Living service offer.</p>

<p>2.4</p> <p>2.5</p> <p>2.6</p> <p>2.7</p>	<p>PCHA will maintain the confidentiality of all information relating to the needs of individuals and other relevant assessments and information, (subject to its Policies, the outcomes of risk assessments and current legislation).</p> <p>PCHA will respect the rights of individuals to make their own decisions. In all situations there will be an assumption of capacity and individuals will be supported to make choices even where this may seem eccentric or unwise, or carry an element of risk - providing people are able to make their own decisions.</p> <p>Any concerns over the capacity of adults to make decisions in an informed way will be considered jointly by the Senior Housing Officer and the relevant professional body will be contacted i.e. General Practitioners (GP), Adult Services if there are concerns over an applicant's/customer's capacity to make informed decisions.</p> <p>PCHA will provide all staff delivering the independent living service with comprehensive guidance and training on understanding and delivering needs and risk assessments, managing risk, and supporting appropriate risk taking.</p>
<p><b>3</b></p>	<p><b>Policy</b></p>
<p>3.1</p> <p>3.2</p> <p>3.3</p> <p>3.4</p> <p>3.5</p> <p>3.6</p> <p>3.7</p>	<p>Each person will have a “person centred” action plan and safety plan. The action plan will explore all key areas where assistance is needed to maintain independence within the customer's home and in the wider community. “SMART” action planning will be used as a framework to ensure that this agreement is enabled.</p> <p>When a customer feels that the service has met their needs they may request for an assessment to be removed from service. This assessment must establish that all their needs have been met and that all risks are being managed. Customers must give a four week notice prior to coming off the service.</p> <p>In the event where customers do not engage with the service the Housing Assistant will remind customers of the conditions of their Independent Living Agreement and Tenancy Agreement. Where a customer fails to engage, an action under the customer's relevant tenancy agreement must be considered by the Senior Housing Officer.</p> <p>Where a married couple have a joint tenancy, they should still be assessed as individuals for the purposes of action planning. It may be that one partner features in the other's plan as an informal carer, but each should have the assurance of privacy of any information given in needs assessment discussions.</p> <p>Needs and risk assessments will be reviewed as a minimum on an annual basis but will also be triggered by any significant change in circumstances or at a customers' request.</p> <p>Assessments will be quality checked by the Senior Housing Officer to ensure consistent practice and quality across the service. Staff reviewing case files will carry out quality checks and invite suggestions for improvement. These will be evidenced by File Notes, and recorded at one to one supervision sessions.</p> <p>The customer should be directly involved in needs and risk assessments and any consequent risk management plans through one-to-one discussion with the Housing Assistants. It may also be appropriate to involve other individuals or organisations in identifying and managing</p>

	<p>risks, for example, relatives or Social Services, particularly those identified as being involved with the customer at the point of referral. This should be with the knowledge and informed consent of the service user. The Housing Assistant may contribute to the discussion and assessment, but must be satisfied that any expressed needs or wishes originate from the customer, with no undue influence from family or friends.</p> <p><b>3.8</b> Where possible, needs and risk assessments and the reviews of the information they contain should include updates and information from agencies and individuals involved in enabling the customer to maintain independence. Where this takes place the notes of any meetings undertaken along with any relevant documents should be stored with the reviewed action plan. Where the customer has a Care Act Assessment and Care Plan, permission will be sought from the customer to request that information from the statutory body be shared with the Housing Assistant.</p> <p><b>3.9</b> The dignity of the service user should be respected at all times and where possible the service user should be offered choice in the way that needs and risk are considered. As a minimum the customer’s key wishes and aspirations should be identified. Where assessments indicate support is outside the ability or responsibility of PCHA, customers should be signposted to appropriate services, with the Housing Assistant acting as an advocate as appropriate, and this recorded in the action plan and considered at the review.</p> <p><b>3.10</b> No information gathered about the service user should be shared with anyone else without the prior knowledge and consent of the service user except in cases covered by PCHA’s Confidential Reporting Policy, information sharing agreements or protocols with external agencies and the Data Protection Act such as the need to share information to prevent a crime, to prevent risk of harm or actual harm to the individual or others.</p> <p><b>3.11</b> It is important in undertaking needs and risk assessments that staff members are aware of the personal time or resources required to deliver a support service. Unless it is agreed with their Line Manager staff should not, for example, provide services to customers out of hours or when they are supposed to be on leave. It is important that staff remember and ensure customers are aware that the service is one of befriending and empowerment but is not a personal friendship and cannot be delivered as such.</p> <p><b>3.12 Appeals and Complaints</b></p> <p><b>3.12.1</b> Where PCHA refuse to provide an Independent Living service, customers may request a review of the decision within 14 days of being notified, via the PCHA Appeals Policy and procedure. If customers are unhappy with the way they have been treated by PCHA during the course of the application, they can seek redress via the PCHA Complaints and Feedback Policy.</p>
<b>4</b>	<b>Implementation</b>
<b>4.1</b>	<p>All applicants are assessed before an offer of an independent living tenancy is made to ensure the service is appropriate to meet their needs. A more detailed assessment is carried out on entrance to the service. These assessments will then inform the action plans for service users. Risk assessments accompany the needs assessment to ensure the level of assistance available is sufficient to maintain the customer in independent living accommodation. Risk assessments will not seek to exclude any applicant, but look to address the management of any risks posed. If the service is unable to meet the needs of the applicant then the Senior Housing Officer will</p>

	signpost the applicant to a more appropriate service provider or the local housing options team.	
4.2	An initial action plan is to be completed within four weeks of a customer moving into their new home.	
4.3	Any issues arising that may give rise to an element of risk should trigger a review of the needs and risk issues relevant to a particular customer. This should be followed through into the action plan to ensure actions relating to risk management are part of the bigger picture of ensuring a customer can maintain independence. There is a need to ensure risks that a customer will take to enjoy their life and fulfil their aspirations will be supported and considered. Staff will not be risk averse but will promote appropriate risk taking.	
4.4	Copies of the needs and risk assessments are the property of PCHA and the service user is entitled to a copy of the documents. Where customers ask not to keep copies of the paperwork they will be asked to sign a document that confirms this and advised they can have access to the documents at any time. Documents will be stored in secure filing systems and computerised records kept on a password protected system.	
4.5	It is the responsibility of the Operations Director- PCHA to ensure this Policy and the supporting procedures are effectively implemented.	
<b>5</b>	<b>Performance</b>	
5.1	In operating this Policy PCHA will record and monitor performance against the following key performance indicators: <ul style="list-style-type: none"> <li>• Target for 100% of action plans to be reviewed every year</li> </ul>	
<b>6</b>	<b>Consultation</b>	
6.1	The customer Empowerment Panel were consulted in the review of this Policy on 29 <sup>th</sup> March 2022. All PCHA staff were consulted in the development of this Policy.	
<b>7</b>	<b>Review</b>	
7.1	The Policy will be reviewed every three years (from the date of PCHA Departmental Management Meeting –DMT approval), with input from the Customer Empowerment Panel. The review process will ensure continuing suitability, and effectiveness of the Policy, and may be prompted by the introduction of new legislation/regulation, or in the light of findings from ongoing risk assessments of service user’s circumstances.	
7.2	Individual customers will be asked for any feedback on the implementation of the policy and its contents, as will agencies working with customers to deliver support. The Housing Assistant who delivers the service will be asked for their views on the effectiveness of the Policy and its implementation as part of the formal review process.	
<b>8</b>	<b>Equality Impact Assessment</b>	
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes

8.2	When was EIA conducted and by who?	The EIA carried out by the Policy Officer and Policy and Strategy Manager in March 2022.
8.3	Results of EIA	There were no key recommendations as result of the EIA as the current systems in place for quality management are thought to be sufficiently robust to mitigate any risks there may be for adverse or differential impact to any group with protected characteristics.

## 9 Scheme of delegation

9.1	Responsible committee for approving and monitoring implementation of the Policy and any amendments to it	PCHA DMT
9.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Operations Director - PCHA
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operations Director - PCHA

## 10 Amendment log

Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
New Policy –This is the first version of the Policy	Not applicable	See Section 6	Not applicable
26 <sup>th</sup> February 2019	In line with the Review Schedule	See Section 6	There are no significant changes to the Policy.
12 <sup>th</sup> April 2022	In line with the Review Schedule	See Section 6	There are no significant changes to the Policy.