Dual Visit and Customer Risk Policy

Should colleagues require any reasonable adjustment to allow for engagement with this document please contact the policy lead

Date of Approval:	August 2025
Policy Author:	Sara Hendry, Housing Manager (Tenancy and ASB)
Policy Lead:	Sara Bennett, Head of Housing
Date of next review:	August 2028

You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the Brighter Places Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements.

Contents

Contents 2
1. Policy Statement / Purpose 3
2. Commitment 3
3. Linked Documents 4
4. Legal and Regulatory Compliance 4
5. Policy Detail 5
5.1. Introduction and scope 5
5.2 Procedure 5
5. 2.1 High Risk VIPs 7
5.2.2 Categories of User Defined Characteristics (UDCs) 7
5.2.3 Review of UDC's 8
5.2.4 Contractor and 3rd Party Information Sharing 8
5.2.5 Definition of risk / criteria for a UDC 9
i. Low risk 9
ii. Medium risk 10
iii. High risk 10
5.3. Right to Appeal 11
6. Training Requirements 11
7. Monitoring and Review 11
8. Data Protection 11
9. Equity, Diversity and Inclusion 11
10. Summary Roles and Responsibilities 12

1. Policy Statement / Purpose

The Health and Safety of our colleagues, contractors and customers is key in our delivery of safe accessible services.

The Dual Visit and Customer Risk Policy aims to fulfill Brighter Places (BP) health and safety responsibilities by identifying customers, members of their household and/or visitors who could be potentially violent, been previously violent, or exhibited behaviours that cause concern for their safety/welfare and may otherwise pose a risk to colleagues, contractors and relevant partner agencies.

The policy also sets out how details of such concerns are recorded on our systems, what information is available and to whom this information may be shared with, and how we review our User Defined Characteristics (UDC's).

A UDC is a flag that we add to our Housing Management system and enables our colleagues and contractors to identify those who are either at risk to themselves or may pose a risk to others. UDC's are also used to highlight our customer's needs, for example if a customer needs large print or is vulnerable due to another reason.

By using UDC's we can make informed decisions as to how we best serve and support these customers, as well as protecting our colleagues, contractors or other agencies. We may consider restriction of access to some services for customers for a period of time that we deem high risk. All our cases will have regular reviews to ensure we are proportionate in delivery.

2. Commitment

- We will ensure that we report, investigate and act on incidents where our colleagues, contractors or customers feel they are at risk via our Anti-Social Behaviour (ASB) and Hate Crime Policy and/or the Incident Reporting forms (IR1 and 1R2) referenced within this policy.
- We will use our investigation to ascertain whether the customer or their family should have a UDC added to their Housing Management system account.
- A UDC addition will only be added where the individual or their activities pose a genuine risk, and the decision should be based on objective and clearly defined criteria. The criteria should consider the need to accurately record and evidence any incident.
- We will flag those customers who are most vulnerable, for example where the customer lacks capacity or has poor mental health.
- We will keep our contractors up to date and aware of any pertinent UDC's such as the need to 'Visit in Pairs,' or other special need to know information.

- We may also feel it necessary to share this information with other agencies we work with, such as the Police or agencies, where this is proportionate, reasonable and necessary.
- We will aim to routinely notify tenants of any UDC which might restrict or delay services. Services can be restricted for anything from 3 to 12 months, subject to review and could be extended if the risk still persists. We may not notify a customer if we are concerned that notification may escalate a customers behaviour, e.g. some ASB cases. We provide an opportunity for appeal, and we review UDCs upon the expiry of the term put in place. This is completed on a monthly rolling basis.

3. Linked Documents

- Lone Working Procedure
- Health and Safety Policy
- Data Protection Policy
- Dealing with Challenging Behaviours Policy
- ASB and Hate Crime Policy
- Feedback Policy
- Equity, Diversity & Inclusion & Policy

4. Legal and Regulatory Compliance

- Data Protection Act 1998 - The first data protection rule requires that the processing must be fair and lawful. This means to put a UDC marker on an customers file or tenancy record it must be based on a specific incident, expression of clearly identifiable concern by a professional or clearly identified risk to the welfare of a colleague, and not general opinion about that individual.
- Health & Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Information Commissioner
- Freedom of Information Act 2000
- The Crime and Disorder Act 1998
- Anti-Social Behaviour, Crime and Policing Act 2014
- The Equality Act 2010

5. Policy Detail

5.1. Introduction and scope

In addition to managing risk for our colleagues and contractors the Dual Visit and Customer Risk Policy also aims to ensure that:

- Brighter Places acts fairly, openly, and consistently when identifying those who pose a threat to colleagues and contractors and adhere to UK Data Protection Act.
- Brighter Places complies with all other relevant legislation and other policies and procedures (see Sections 3 & 4).
- We ensure that all customers (except at the request of the Police or Probation services in very high-risk cases, or upon the consideration or service of a Court Order) are made aware that they have been identified as a risk to colleagues.
- Any information we store relating to a customer or member of their household linked to a UDC or flag, is considered personal data under the Data Protection Act. Information will be relevant, factual, non-subjective and evidenced from incidents and shared information from official sources.
- UDC markers are appealable and reviewed prior to the marker coming to an end. Any risk or information that is considered to be out of date or not relevant is removed from the housing management system.

5.2 Procedure

The initiation of any UDC will usually derive from the IR1 and follow up IR2 that are completed by the officer affected and relevant line manager. The only exceptions to this will be where flags are placed on the system where vulnerabilities are disclosed by our customers or noted by our colleagues or contractors, such as physical disabilities and reasonable adjustments are required to manage delivery of services for the customer.

IR1 and IR2 reporting is available on Share Point for all colleagues:

The IR1 includes:

- Type of incident
- Who was affected
- Incident category (for example verbal or physical abuse, or other vulnerability)
- Description of what happened by the officer completing the IR1
- Whether any first aid or medical advice was needed
- What immediate action was taken to address the issues raised.

The IR2 is completed by the line manager. If the line manager is away from the business another manager will cover this work in their absence to ensure that any actions identified are completed.

The manager completes an investigation into the circumstances and incident itself then reports using the IR2:

- Description of the event
- An upload of any evidence of what has occurred such as photographs or reports
- Review the incident, identify any lessons learned and ensure these are communicated and/or actioned where needed
- Clarify the actions and responsibilities for addressing what is needed because of the incident with colleagues involved or affected
- Whether as part of the UDC inclusion the customer is to be notified
- Any Police crime reference numbers or details of police attendance (subject to Data Protection legislation)
- The need for a UDC marking Visit in Pairs.

As part of the investigation, the relevant manager will review and take advice as to the best way of managing the customers poor behaviour and/or vulnerability. They may also seek advice from any or all of the following teams:

- Human Resources
- Health and Safety
- Tenancy Sustainment Manager or one of the Safeguarding Deputies for Safeguarding advice
- Housing Manager (Tenancy & ASB) or the ASB Team (physical abuse must be raised with the ASB team immediately to ascertain what, if any, legal remedy is required).
- Housing Officers for the relevant patch
- Any other relevant team or colleague at Brighter Places

On completion of the IR1 and IR2, the manager and officer may feel that the incident requires further risk management by initiating Visit in Pairs. This is most likely to be where there has been verbal and/or physical use or there is evidenced risk to any colleague visiting. In exceptional circumstances, there may be occasions where visits are restricted even further and may mean that colleagues cannot attend without representation from Police and this may cause interim disturbances to services provided.

The manager will also add the following in the notes field for the UDC if available:

- The Incident Report Reference Number from the IR1 & IR2 – link to the relevant IR forms
- Any Police Incident Report Number and details of the Police attendance
- Any reasons for not informing the customer of the UDC inclusion i.e., if there are concerns that by advising the customer this will escalate the problem and put others at risk.

5. 2.1 High Risk VIPs

If there is immediate risk to any colleague or contractor, the line manager can place a UDC on the account that advises that there are to be no home visits to the customer until further notice.

This decision will be in conjunction with the Housing Manager and/or the Head of Housing. In their absence another senior manager should be consulted.

This could be due to a report of weapons in the property for example.

This will be communicated to our contractors by the relevant surveyors or managers who oversee any affected contracts.

5.2.2 Categories of User Defined Characteristics (UDCs)

These are separated into 3 sections on the Housing Management system report:

- Visit in Pairs (VIPs)
- Person
- Tenancy

Each is then set up with sub sections so you can identify and report on specific reasons as to why a customer or their property may need to be flagged.

UDC's can be raised against a 'Property' or a 'Person.' Any UDC's which present risk to workers must be added to both areas of Housing Management system.

UDC's include (not exhaustive):

- Consent/ Comms (for those who require amended service delivery)
- Person Alert - Vulnerable Individuals
- VIP (Visit in Pairs)
- Safeguarding
- Supported by Tenancy Sustainment Team
- Access

- Hoarder
- ASB management Alert
- Risk Individual
- Hoarding/Squalor
- Aggressive Pet
- Visits prohibited

When UDC's are placed onto an account colleagues can include an 'end' date where the UDC will automatically be reviewed or removed. This can be useful in cases of Covid for example, as they will not require further flagging post recovery.

Most UDC's will not be given an end date to ensure that the Housing Manager can review all UDC's and to ensure that we are acting proportionately and being as accountable as possible.

5.2.3 Review of UDC's

UDC's will be actioned at the point of IR1 and IR2 and the line manager who has completed the IR2 will usually advise the customer that they have a UDC on their account, what it is for and when it will be reviewed.

Exceptions to this can be whereby notifying the customer the manager feels the risk of further issues would escalate. This reasoning must be noted on UDC notes.

All UDCs must be reviewed before the expiry date. These reviews will usually be managed by the Housing Manager for Tenancy and ASB but will need engagement from the officers involved in the UDC placement as to feedback and make any amendments needed.

It is not the sole responsibility of the Housing Manager for Tenancy & ASB to make decisions on UDC's that have been implemented by other managers and officers although they will be able to offer advice and assistance where needed. The review may include speaking to or writing to the customer as an example. Regardless of the communication method, if a UDC is to be removed or remain, the customer must be advised and notes updated on our Housing Management system.

As part of the review, the manager will consider the following:

- Whether there have been any further incidents from colleagues, agents, or other contractors since the original request for a UDC
- Knowledge of any unlawful aggressive behaviour secured via ASB management
- Whether the customer has shown any unusual or concerning behaviour elsewhere in the management of their tenancy that could negatively affect their behaviours or the way in which they engage with BP

- Whether the customer has demonstrated any unusual or concerning behaviours with any of its BP contractors.

The Housing Manager, the officer and their line manager are responsible for jointly reviewing the decision as to whether the UDC is maintained or removed. Care should be taken to ensure that UDC's are maintained where needed and not left on Property or Tenant details due to a long-standing event.

For example, if a customer has been verbally abusive and has apologised for their behaviour, and there are no further incidents, the Housing Manager will look to remove the UDC and update the customer.

Areas such as these are often subjective, and it can be difficult to ensure rationality and reasonableness in the decision-making process. Advice, if needed, can be sought from the Head of Housing or the Head of Customer Experience.

If a decision cannot be agreed by the officers involved, then a referral can be made to the Head of Safety Assurance and the Head of Housing for review. Their decision is final.

5.2.4 Contractor and 3rd Party Information Sharing

It is the responsibility of the relevant manager or officer who oversees contract delivery to ensure that the contractor or anyone accessing the property on behalf of Brighter Places is aware of relevant UDC's and specifically the need to visit in pairs or no visits.

5.2.5 Definition of risk / criteria for a UDC

These definitions are intended only as a guide and not as a conclusive list. The actual assessment of risk ratings should be based on the individual customer's circumstances and consideration of the information received.

i. Low risk

- Angry and making aggressive personal comments about staff members.
- Exhibits behaviour that causes colleagues concern for their safety/welfare e.g., hoarding, safeguarding, mental health.
- Known or suspected substance misuse where there is evidence or suggestion that the abuse of the substance can result in changes in behaviour that may pose a perceived risk to colleagues.
- Known or suspected needle stick risk in property. This reflects the risk of needles being disposed of improperly even where the use of needles is for a legitimate purpose.

ii. Medium risk

- Threatening behaviour including personal threats to harm.
- Previous unspent convictions for violent and sexual offences as revealed by the customer, Police or Probation services or another relevant partner. These could include:
    - Common Assault
    - Sexual Assault (where there is no violence involved)
- Mental health problems with reported risk of threat of violence or violence to others.
- Suspected involvement within organised crime or gangs.
- Domestic Abuse – this may also be high risk

iii. High risk

- Specific incidents of violence or attempted violence.
- Domestic abuse – this may also be Medium risk
- Previous unspent convictions for violent and sexual offences. e.g. could include;
    - Sexual assault where violence has been used
    - Rape
    - Assault with intent
    - Actual bodily harm
    - Grevious bodily harm
    - Knife and firearm offences
- Sex offenders on release from prison or on an order where PPB or MAPPA are involved.
- Where recommended by the Police and/or Probation Service that a person is a risk to colleagues and members of the public and is the subject of on-going monitoring.
- Suspected involvement in organised crime gangs (information provided and verified, if necessary, by the Police).
- Previous unspent convictions for other serious criminal offences involving serious violence and/or the use of offensive weapons, knives, and firearms.
- Identified involvement within organised crime or gangs.

This is not an exhaustive list, and further offences could be considered for inclusion at the discretion of a Manager. Where possible, the date relevant convictions are spent

should be entered onto the UDC notepad. UDC markers should be removed when all relevant convictions are spent.

5.3. Right to Appeal

Where a decision has been made to apply a UDC marker, the customer, member of their household or visitor to their property should be advised, (unless a decision has been made by a manager not to warn them at this stage due to risk), that they have a right to appeal against the decision to the Housing Manager within 14 days of being notified. Appeals should be sent to info@brighterplaces.co.uk

The customer appeal should include an explanation of why the UDC should be removed.

The Housing Manager will review the evidence provided and respond to the appeal with a decision within 21 working days. During this time, any UDC decision will remain in place until the outcome of the review.

There will be no further appeals allowed under this policy.

6. Training Requirements

All colleagues involved in the management of dual visits and customer risk will receive appropriate training to ensure they understand the legal framework and policy requirements.

7. Monitoring and Review

The policy will be reviewed at least every 3 years.

8. Data Protection

Any personal data created or used in the application of this policy must be done so in line with the Brighter Places data protection policy and privacy notices.

9. Equity, Diversity, and Inclusion

Where required, reasonable adjustments will be considered to support colleagues to engage with this policy. Please speak to the policy owner for assistance.

10. Summary Roles and Responsibilities

Activities	Exec (CSD)	Hsg Mgrs	HoH	All Mgrs	All Colleagues	Gov	HR	HoSA	HoCE	Repairs Mgrs
Owner of Policy		X	X							
Monitoring and review of Policy		X	X			X				
Approval of Changes to Policy	X					X				
Responsibility for Policy implementation		X	X	X	X	X	X	X		
Responsibility for Training and awareness		X	X	X	X		X			
Addressing issues in implementation of policy		X		X						
Version Control of live policy		X				X				
IR1 & IR2 completion					X					
Request and action of UDC					X					
Review of UDC		X							X	
Housing Notification of UDC's to contractors		X							X	X
Appeals		X	X						X	

HoH – Head of Housing

HoSA – Had of Safety assurance

HoCE – Head of Customer Experience