Blackpool Coastal Housing

Customer Advocacy and Authority to Act Policy

October 2026

INSPIRING PEOPLE TO BUILD SUSTAINABLE COMMUNITIES

Document Information

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Scope of Document		
Objective	To provide an overview to customers and prospective customers to understand and access the various ways in which they can be supported by a representative or advocate in their interactions with Blackpool Coastal Housing.	
Who needs to know?	All BCH staff	
Documentation	Customer Reasonable Adjustments Policy Authority to Act Form	
Where Ratified	Senior Management Team	
Review Frequency	Triennial	
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Amendment Record

Date	Issue No.	Section/Page	Details of Change	Authorised By
18/06/2024	1.0	All	Review	Suzanne Tomlinson
14/10/2026	2.0	All	Policy re-named from Customer Advocacy to Customer Advocacy and Authority to Act. General review of full policy and amendment to definition of customer in section 1. Addition made to section 8 relating to written acknowledgement. Reviewing arrangements changed to every 3 years and legal authority to act routine review arrangements removed. Ratified by SMT on 14/10/2026.	Suzanne Tomlinson

Amendment Notes

- Documents at draft status are to use letter designations to denote issue status: a, b, c etc.
- Documents at full issue status are to use number designations to denote issue status after full revision: 1.0, 2.0, 3.0, etc.
- For an amendment to a full issue document you are to use number designation to denote issue status: 1.1, 1.2, 2.1, etc.
- On full issue the draft amendment record should be deleted from the above table.
- Notification of the amendment must be sent to the person maintaining the Central Register.

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1. Introduction

1.1
For the purpose of this policy, the term customer or prospective customer refers to tenants, leaseholders, licensees, looked after children and private customers or homeowners, for whom Blackpool Coastal Housing provides a service.

1.2
Blackpool Coastal Housing understands we have customers or prospective customers with various needs, and some who feel they do not have the confidence, capability, or communication skills to engage with us about their tenancy, license or lease, or the services we provide.

1.3
This policy aims to ensure that customers and prospective customers understand the various ways in which they can be supported by a representative or advocate in their interactions with Blackpool Coastal Housing (BCH).

1.4
This policy sets out how customers and prospective customers can give authority for someone else to act on their behalf in housing or service-related matters.

2. What is Advocacy?

2.1
Advocacy means getting support from another person to help someone express their views and wishes and help them stand up for their rights. Someone who helps another person in this way is called an advocate.

2.2
An advocate does not necessarily have the Authority to Act on behalf of someone – it depends on the type of advocacy and if express consent has been given.

3. Scope of Advocacy

3.1
Self-Advocacy – is when a person has the confidence, capability, or communication skills to engage with us about their tenancy and can make informed choices and decisions.

3.2
Case Advocacy – is when a person lacks the confidence, capability, or communication skills to engage with us about a specific issue, or set of issues, due to short-term crisis and appoints a Case Advocate.

A Case Advocate might only help someone express their views and wishes and stand up for their rights; or with express consent, can act on their behalf in relation to the specific issue or set of issues. Case Advocacy is not intended to be on a long-term basis.

3.3
Statutory Advocacy – is when a person legally requires an Advocate during a process such as an assessment. This may be because the person has a learning disability or a mental health diagnosis that means they cannot legally make their own choices or decisions.

3.4
Citizen Advocacy – is when an unpaid person independent of service providers and customers volunteers to accompany someone to help them express their views and wishes and stand up for their rights. Citizen Advocates must still have the express consent to do so by the person they are accompanying.

Due to their independence, it is not appropriate for Citizen Advocates to have Authority to Act.

3.5
Group Advocacy – is a term used to describe when people with similar backgrounds or shared experiences come together as a collective to have their voices heard. Group Advocacy is often associated with lived experience.

Group Advocacy may also be facilitated by other statutory and non-statutory organisations such as Tenant & Resident Associations, Consumer Groups, Voluntary and Community Groups and Patient Forums. Group Advocacy does not advocate on behalf of one person.

3.6
Community Advocacy – is a term used to describe place-based advocacy where there is no expressed individual consent or legal entitlement. Community Advocates have a strong familiarity with the needs of a demographic community and/or knowledge of their neighbourhoods.

Community Advocates can be independent but are often connected to community groups and may also be referred to as Community Leaders or Community Champions. Community Advocacy does not advocate on behalf of one person.

4. What is Authority to Act?

4.1
Authority to Ac' is the process whereby a person gives expressed consent to someone (the 'Nominee') to act on certain tasks such as communicating on their behalf, completing, and submitting applications, and making declarations and payments.

4.2
The Nominee must be someone they can trust to act on their behalf in relation to their tenancy, such as a partner, relative or friend. In exceptional circumstances this may include a support worker, professional, voluntary of community representative who has a long-standing relationship with the person.

5. Scope of Authority to Act

5.1
A customer or prospective customer may give Authority to Act in relation to one or more of the following types of matters:

- Accessing a BCH service
- Access to and changing of personal records
- Financial transactions
- Making a complaint
- Requesting a review of a decision
- To receive and respond to communications from BCH
- Any other tenancy, lease or housing related issue not specified

6. Mental Capacity Act 2005

6.1
In line with the Mental Capacity Act 2005, BCH will liaise with those who have legal Authority to Act on behalf of customers or prospective customers who lack capacity.

6.2
This includes:

- Lasting Power of Attorney (LPA)
- Deputyship Order from the Court of Protection
- Litigation friend appointed in Court proceedings if the resident lacks capacity to litigate
- Appointee assigned by the DWP to manage a person's benefits if they lack capacity
- Independent Mental Capacity Advocate (IMCA) commissioned by the local authority who are appointed where a person aged 16 or over lacks ability to act to decide for themselves where to live and has no-one, such as a friend, relative, attorney or deputy to advise or support them

7. Temporary Authority to Act

7.1
If a customer or a prospective customer wants to give someone Temporary Authority to Act, BCH will accept a verbal request of expressed consent for us to speak with someone else, only at that moment in time, about a specific situation. This Temporary Authority to Act will be recorded on the case note, or other relevant system.

7.2
Temporary Authority to Act is only appropriate during an in-person interaction or phone call, where the customer feels they do not have the confidence, capability, or communication skills to engage with us, and verbally requests we speak with someone else at that moment in time about a specific matter.

7.3
This type of scenario is not uncommon, and we understand that the support of someone else can assist in communicating and concluding the issue.

7.4
Where there is the likelihood of future communication required to conclude the issue, we will advise the customer or prospective customer to consider appointing someone with Authority to Act reflecting a more formal agreement akin to Case Advocacy.

8. Non-Temporary Authority to Act

8.1
If a customer or a prospective customer wants to give someone longer term Authority to Act, they will need to complete the Authority to Act Nominee Form. The customer or prospective customer and their nominee will then both receive a written acknowledgement to confirm that the authority to act is in place.

8.2
BCH will not accept a verbal request for Non-Temporary Authority to Act.

9. Working with those with Authority to Act

9.1
Once the Authority to Act Nominee form is completed and signed by all parties, Blackpool Coastal Housing will:

- Conduct all communication with the nominee in the same way as if it were directly with the customer or prospective customer
- Record all communication with the nominee on our systems, making it clear that the communication was with the nominee
- Expect the same standards of behaviour towards staff from a nominee as we would from the customer or prospective customer
- Reserve the right not to deal with a nominee if their behaviour is unacceptable, in line with our Unacceptable Behaviour Policy
- Reserve the right to not deal with a nominee where we have reason to suspect they are not pursuing the best interests of the customer or prospective customer and refer such cases to the relevant authorities

10. Reviewing Authority to Act

10.1
BCH recognises that a person's circumstances can change, which may lead to an improvement in their confidence, capability, or communication skills to engage with us about their tenancy.

10.2
BCH also recognises that a person's relationship status, family dynamic and support network may change, which may lead to the need to change a nominee acting on their behalf.

10.3
To ensure our records are up to date and that we are complying with the express consent of customers and prospective customers, we will review Authority to Act arrangements every three years, or earlier at the request of the customer or prospective customer due to a change in circumstances.

Arrangements that represent a Legal Authority to Act, as outlined within Section 6, will not be routinely reviewed and will remain in place until BCH receive instruction otherwise, along with any legal documentation, where applicable.

11. Right to Privacy

11.1
In line with the General Data Protection Regulation (GDPR), BCH will not discuss customer or prospective customer issues with anyone who has not been given consent by the person to act on their behalf in matters relating to their tenancy, lease or licence or a service we are providing.

11.2
BCH will act and advise customers and prospective customers in line with this policy in matters relating to appointing temporary or non-temporary authority to act and appropriate advocacy.

11.3
BCH will keep data from temporary or non-temporary Advocates with authority to act in line with the General Data Protection Regulation (GDPR) and will remove all detail set out within its Retention Policy.