



Central Bedfordshire
Council
Priory House
Monks Walk
Chicksands,
Shefford SG17 5TQ

please ask for Paula Everitt
direct line 0300 300 4196
date 1 May 2014

NOTICE OF MEETING

SOCIAL CARE, HEALTH & HOUSING OVERVIEW & SCRUTINY COMMITTEE

Date & Time

Monday, 12 May 2014 10.00 a.m.

Venue at

Council Chamber, Priory House, Monks Walk, Shefford

Richard Carr
Chief Executive

To: All other Members of the Council

(The Council AGM at which the membership of the Committee will be confirmed will take place on 01 May 2014. As such all Members of the Council have been provided with a copy of the papers).

**MEMBERS OF THE PRESS AND PUBLIC ARE WELCOME TO ATTEND THIS
MEETING**

AGENDA

1. **Apologies for Absence**

Apologies for absence and notification of substitute members

2. **Minutes**

To approve as a correct record the Minutes of the meeting of the Social Care Health and Housing Overview and Scrutiny Committee held on 7 April 2014 and to note actions taken since that meeting.

3. **Members' Interests**

To receive from Members any declarations of interest and of any political whip in relation to any agenda item.

4. **Chairman's Announcements and Communications**

To receive any announcements from the Chairman and any matters of communication.

5. **Petitions**

To receive petitions from members of the public in accordance with the Public Participation Procedure as set out in Annex 2 of Part A4 of the Constitution.

6. **Questions, Statements or Deputations**

To receive any questions, statements or deputations from members of the public in accordance with the Public Participation Procedure as set out in Annex 1 of part A4 of the Constitution.

7. **Call-In**

To consider any decision of the Executive referred to this Committee for review in accordance with Procedure Rule 10.10 of Part D2.

8. **Requested Items**

To consider any items referred to the Committee at the request of a Member under Procedure Rule 3.1 of Part D2 of the Constitution.

Part A: Health Scrutiny

to consider matters relating to health of adults, children and young people and 'substantial' changes to NHS provision in Central Bedfordshire.

Reports

Item	Subject	Page Nos.
9	Executive Member Update To receive a brief verbal update from the Executive Member for Social Care Health and Housing.	* verbal
10	East and North Hertfordshire NHS Trust Performance Presentation To receive a presentation on performance of the East & North Hertfordshire NHS Trust, Lister Hospital, Stevenage.	* verbal
11	Quality Accounts To receive the draft 2013/14 Quality Accounts from: <ul style="list-style-type: none">• The Luton and Dunstable Hospital University Hospital NHS Foundation Trust• Bedford Hospital NHS Trust and• South Essex Partnership NHS Foundation Trust (SEPT).	* 13 - 20
12	Bedfordshire Plan for Patients 2014/16 To receive and comment on the Bedfordshire Clinical Commissioning Group's Bedfordshire Plan for Patients 2014/16.	* 21 - 46
13	Better Care Fund Report To receive and comment on the final Better Care Fund submission.	* 47 - 52

Part B: Social Care and Housing

To consider matters relating to adult social care and housing services and any other matters that fall within the remit of the Social Care, Health and Housing Directorate.

Reports

Item	Subject	Page Nos.
14	Allocations Policy To consider and comment on the Housing Allocations Policy.	* 53 - 216

15 **Draft Housing Investment Plan** * 217 - 262

To consider and comment on the proposed scope to deliver a new homes programme and regeneration.

16 **Work Programme 2014-15 and Executive Forward Plan** * 263 - 270

To consider the currently drafted Social Care Health and Housing Overview and Scrutiny work programme for 2014/15 and the Executive Forward Plan.

CENTRAL BEDFORDSHIRE COUNCIL

At a meeting of the **SOCIAL CARE, HEALTH & HOUSING OVERVIEW & SCRUTINY COMMITTEE** held in Council Chamber, Priory House, Monks Walk, Shefford on Monday, 7 April 2014.

PRESENT

Cllr Mrs R J Drinkwater (Chairman)
Cllr N J Sheppard (Vice-Chairman)

Cllrs Mrs A Barker
R D Berry
Mrs G Clarke
P A Duckett

Cllrs Mrs S A Goodchild
Mrs D B Gurney
M A Smith

Members in Attendance:	Cllrs	P N Aldis D Bowater	Vice-Chairman of the Council
		C C Gomm C Hegley	Executive Member for Social Care, Health & Housing
		J G Jamieson	Leader of the Council and Chairman of the Executive
		B J Spurr	Executive Member for Sustainable Communities - Services
		A M Turner	Deputy Executive Member for Social Care, Health & Housing
		J N Young	Executive Member for Sustainable Communities - Strategic Planning and Economic Development

Officers in Attendance:	Mr B Douglas	– Tenant Involvement Leader
	Mrs P Everitt	– Scrutiny Policy Adviser
	Mr D Jones	– Interim Consultant, Adult Social Care
	Mr T Keaveney	– Assistant Director Housing Services
	Mr S Mitchelmore	– Assistant Director, Adult Social Care
	Mr N Murley	– Assistant Director Business & Performance
	Mrs J Ogley	– Director of Social Care, Health and Housing
	Ms C Rooker	– Head of Housing Management
	Mrs E Saunders	– Assistant Director Commissioning

Others in Attendance	Mr R Ayles	Tenant's Scrutiny Panel
	Mrs M Bradley	Head of Mental Health and Wellbeing, Bedfordshire CCG
	Mrs N Fraser	Director of Nursing and Patient Services, Bedford Hospital
	Ms J Harnett	Tenant's Scrutiny Panel
	Mr M Miles	Tenant's Scrutiny Panel
	Mrs H Smart	Director Integrated Adult Services & Lead Nurse, SEPT Integrated Services
	Ms M Thirwell	Tenant's Scrutiny Panel
	Mr M Westerby	Head of Public Health, Adults and Older People
	Mr R Winter	Executive Director Integrated Services Bedfordshire & Luton (Community Service)

SCHH/13/130 **Minutes**

RESOLVED

That the minutes of the meeting of the Social Care Health and Housing Overview and Scrutiny Committee held on 7 April 2014 be confirmed and signed by the Chairman as a correct record.

SCHH/13/131 **Members' Interests**

Cllr Mrs G Clarke declared an interest as a family member worked for the Clinical Commissioning Group. Cllr D Bowater also declared an interest as he was a governor of SEPT.

SCHH/13/132 **Chairman's Announcements and Communications**

The Chairman had prepared a briefing note on the Joint Health Overview and Scrutiny review and distributed copies at the meeting. The Chairman drew Members' attention to the dates of the Stakeholder events and public meeting arranged by Bedfordshire CCG.

SCHH/13/133 **Petitions**

None.

SCHH/13/134 **Questions, Statements or Deputations**

None.

SCHH/13/135 **Call-In**

None.

SCHH/13/136 Requested Items

None.

SCHH/13/137 Executive Member Update

The Executive Member for Social Care Health and Housing updated the Committee on issues that were not included on the agenda, these included:-

- Attendance at a 'Singing for the Brain' event, a service for dementia sufferers.
- A visit to a Care Home for dementia sufferers.
- Attendance at the LGC Awards evening
- The completion and approval of the Better Care Fund at the Health and Wellbeing Board meeting.
- A television interview on the Spare Bedroom subsidy
- The official start of the construction of Priory View in Dunstable would take place on Friday 11 April.

SCHH/13/138 Hospital Discharge Performance

The Chairman welcomed Nina Fraser, Director of Nursing at Bedford Hospital who provided an update to Members on the changes to Hospital Discharge at Bedford Hospital. These changes included:-

- Matrons leading on the planning of hospital discharge;
- Daily meetings with SEPT and Social Services on patient discharges;
- The introduction of a discharge planner on each ward;
- The implementation of 7 day working;
- Support that was provided for carers through a 'carers lounge'.

In light of the update Members discussed several issues and comments in detail as follows:-

- The procedures that were in place to inform GP practices of those patients who were about to be discharged from hospital. Mrs Fraser explained that improvement in this area was very important and a joint system was needed, however, this would take time to put in place. A Member raised a specific concern regarding this practice, which Mrs Fraser agreed to consider outside of the meeting.
- The improvements that had been made in dispensing prescriptions from the hospital pharmacy on discharge. Mrs Fraser confirmed the pharmacy was open for a longer period of time and better planning on the wards had ensured that prescriptions were available for patients at the appropriate time.
- Carers were fully engaged to ensure a smooth transition of care into the Community including the use of schemes like the Good Neighbour Scheme.
- The need for other care providers to offer a 7 day working service. Representatives from SEPT confirmed they provided this service and a rapid care service was available if required. The Director of Social Care Health and Housing advised that the Better Care Fund would pick up on hospital discharge and 7 day working. Data sharing was a national problem between hospitals and GP surgeries and other care providers.

NOTED the update.

SCHH/13/139 Biggleswade Hospital Information Update

Richard Winter, Executive Director of SEPT introduced a report on the utilisation of commissioned beds at Biggleswade Hospital that also included the current admissions criteria. Mr Winter confirmed that the six patients referred to in admissions caseload table in the report were female admissions. A Member of the Committee suggested patients on the Cambridgeshire/Hertfordshire border might be offered places at the Hospital to utilise a greater number of beds, the Executive Director agreed to feed this suggestion back to the Commissioners. The Director of Social Care Health and Housing explained the use of the Hospital would be considered through the Better Care Fund and she would bring to the Committee any concerns conveyed to her by SEPT.

SEPT officers were thanked by Members for their work on the production of this report.

NOTED the report.

SCHH/13/140 Planned Changes to the Provision of Mental Health and Community Services

Richard Winter, Executive Director of SEPT introduced a report that he clarified related to the planned changes to the provision of the Community Continence Services. The proposal was to adjust the current provision by changing the supply of products to new patients and removing the provision of pads to Nursing Homes in order to provide a cost saving.

Members congratulated SEPT on the excellent service provided to the Community and welcomed the changes proposed in the report.

NOTED the report.

SCHH/13/141 Mental Health Procurement

Michelle Bradley, Head of Mental Health and Wellbeing Bedfordshire CCG, introduced a report that outlined the proposed new models of care and consultation on Mental Health Procurement. The changes had been necessary following notice from SEPT to withdraw from the current contract, although they would continue to deliver the service whilst a new provider was sought. It was proposed that BCCG introduce a new outcome based framework to allow outcomes to be measured consistently across all levels of service. The process had been informed by stakeholder engagement and a consultation exercise.

The Assistant Director of Commissioning described to Members the involvement of officers in the proposed new models of care. Given the partnership approach to the proposal, the Assistant Director was confident it would deliver a good service for residents. An easy read version of the models of care would also be available to service users that explained the care pathway.

In light of the report, a Member raised a concern that a high level of children suffered with mental health problems and whether prevention advice was available. The Head of Mental Health Services, BCCG, advised that prevention work was on going, with Public Health, various charities and other partners.

Members thanked SEPT for the improvements in Mental Health services they had provided in Central Bedfordshire.

RECOMMENDED

- 1. That an informal briefing on Mental Health Services be provided to Members of the Committee.**
- 2. That the process for the procurement of Mental Health Services be fully supported.**

(Meeting adjourned at 11.30 and reconvened at 11.40)

SCHH/13/142 Tenant Scrutiny Panel Report

The Head of Housing Management explained to Members the requirement for co-regulation of Housing Services. Members of the Tenant Scrutiny Panel (TSP) explained the background and methodology used to determine that they should investigate the Council's handling of reports of anti-social behaviour. The TSP report outlined 28 recommendations for improvement, which were welcomed by the Head of Housing Services in order to improve the service. Work had been undertaken to improve communications and web presence and a Learning and Development Plan would be implemented to drive through the changes. Officers would seek out best practice models from high performing councils to ensure continued improvements in handling anti-social behaviour complaints.

Arrangements were in place for the TSP to shadow Housing Services staff with a view to identifying new areas of the service to investigate in detail.

In light of the report and presentation Members discussed that it would be useful to be made aware of the TSP's next area of investigation. In addition Members were keen to be kept aware of the implementation of the Panel's recommendations for which timescales should be added so as to identify where improvements had been made.

Members fully supported the review that had taken place and commented on the importance of anti-social behaviour not being underestimated. The Head of Housing Services was requested to advise Members of changes in relation to staffing that were made in order to improve the delivery of services.

RECOMMENDED that the Tenant Scrutiny Panel inform the Committee of their next review and that Members be advised of the progress in relation to implementing the Panel's recommendations in 6 month time.

SCHH/13/143 Meeting the Accommodation Needs of Older People

The Head of Meeting the Accommodation Needs of Older People (MANOP) gave a presentation that outlined the programme's key aims that included:-

- Increase the availability of extra care housing schemes to meet demand.
- Transfer the Council owned care homes back into CBC management.
- In the longer term, reprovide the places in those homes in new buildings
- Ensure future housing developments meet the needs of older people.

The Head of MANOP updated Members on the current position of each of the key areas and plans for the service in the coming year. The smooth transition of the Bupa care homes back into Council management would be undertaken following formal Council approval. The construction and delivery of Priory View in Dunstable and support to Aldwyck Housing Association in the delivery of the new Greenfields in Leighton Buzzard would be provided. Work to progress two new extra care schemes in Ampthill and Biggleswade areas was underway and the outcome of a Homes and Communities Agency bid was awaited.

In light of the presentation Members raised the following issues:

- The need for officers to take account of the successful Step-up Step-down facility in Dunstable when considering the type of care that should be provided in the currently run BUPA care homes.
- Whether facilities for carers/relatives were included in the Strategy. The Head of MANOP advised this had not been included but agreed to raise this with stakeholder/partnership groups.
- The need for the Council to promote the building of accessible homes for the older community. The Head of MANOP advised that a Market Position Statement would encapsulate the need of accessible housing in communities.

NOTED the presentation.

SCHH/13/144 Revenue, Capital and Housing Revenue Account (HRA) Budget Monitoring Presentations

The Assistant Director Resources provided a presentation that highlighted the key points in relation to the forecast capital expenditure and external funding for Q3 2013/14 for the Social Care Health and Housing Directorate. The presentation outlined the key variances and indicators and attention of the Committee was drawn to residential placement activity for older people, which had increased to 86 with the equivalent figures for last year was two.

Housing General Fund schemes continued to be well managed and the indicated spend would be broadly in line with the forecast figure.

The Head of Finance for Public Health reported that at Q3 the forecast was for a balanced budget, however, an underspend of £761k was presently recorded. The main reason was the unspent strategic reserve, vacancies and a saving on the SEPT contract. A risk highlighted in the report referred to Public Health liability for certain prescribing costs. The impact would be a cost of approximately £435k that would be covered from unspent strategic reserve.

NOTED the presentation.

SCHH/13/145 Performance Monitoring Report (Q3)

The report provided information on the Social Care Health and Housing and Public Health performance against the Medium Term Plan and their continued good performance. Those areas not achieving target had been reported to Members previously. Public Health had reported exceeding its target a on Health Checks to residents.

NOTED the report.

SCHH/13/146 Work Programme 2013-14 & Executive Forward Plan

The Chairman drew the attention of Members to a meeting attended with partners and colleagues to consider further work programme items. The outcomes of this meeting were outlined at Appendix B, which identified those items that were currently considered to be an issue. Members of the Committee were asked to consider which of those items they would like to see added to the work programme and to contact the Scrutiny Policy Adviser.

RECOMMENDED

- 1. That the work programme be approved subject to the inclusion of additional items outlined in the body of the Minutes.**
- 2. That Members contact the Scrutiny Policy Adviser to discuss and additional items they wished to see included on the work programme.**

(Note: The meeting commenced at 10.00 a.m. and concluded at 1.20 p.m.)

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Meeting: Social Care, Health and Housing Overview and Scrutiny Committee

Date: 12 May 2014

Subject: Quality Account (2013-14)

Summary: This note provides the Members of the Social Care, Health and Housing OSC with an opportunity to comment on the Quality Account for Bedford Hospital NHS Trust for 2013-14.

Advising Officers: Victoria Parsons, Trust Board Secretary, The Luton and Dunstable Hospital University Foundation Trust
Nina Fraser, Director of Nursing and Patient Services
Bedford Hospital NHS Trust
Richard Winter, Executive Director, South Essex Partnership University Foundation Trust (SEPT)

Contact Officer: Paula Everitt, Scrutiny Policy Adviser (0300 300 4196)

Public/Exempt: Public

Wards Affected: All

Function of: NHS

CORPORATE IMPLICATIONS:

The review of services contained in the draft Quality Accounts are for NHS agencies and not the Council itself. The services referred in the Quality Accounts will however support the Council by promoting health and wellbeing and protecting the vulnerable.

RECOMMENDATION:

- 1. That the Social Care, Health and Housing Overview and Scrutiny Committee comment and agree a statement on the Quality Accounts submitted by The Luton and Dunstable University Hospital Foundations Trust, Bedford Hospital NHS Trust and SEPT if so minded.**

Background

1. All providers of NHS healthcare services in England are required to publish a quality account that represents the quality of the healthcare services delivered over the previous year. Trusts are required to share their quality accounts with Healthwatch and appropriate Overview and Scrutiny committees with responsibility for health matters who are offered the opportunity to comment on the draft document on a voluntary basis. These quality accounts are produced annually and made available to the public.
2. The Department of Health have produced guidance on Quality Accounts titled "Quality Accounts: a guide for Overview and Scrutiny Committees (OSCs)". The DoH guidance states that "Quality Accounts aim to enhance accountability to the public and engage the leaders of an organisation in their quality improvement agenda. If designed well, the Accounts should assure commissioners, patients and the public that healthcare providers are regularly scrutinising each and every one of their services, concentrating on those that need the most attention."
3. The Department of Health Guidance "Quality Accounts: a guide for Overview and Scrutiny Committees (OSCs)" suggests that OSCs might consider the following:-
 - Do the priorities identified by the provider contained in the Quality Account match those of the public?
 - Has the provider omitted any major issues from the Quality Account?
 - Has the provider demonstrated they have involved patients and the public in the production of the Quality Account?

Conclusion and Next Steps

5. The Overview and Scrutiny Committee is asked to consider the Quality Accounts and provide any comments as they feel appropriate. Comments on the Quality Accounts are voluntary, the Committee is not obliged to comment if it does not feel it necessary.
6. Any statements agreed by the Committee will be sent to the provider to allow them time to prepare their final Quality Account, which will include the statement, for publication.

Appendices:

Appendix A - Priorities dashboard Luton and Dunstable Hospital

Appendix B - Priorities dashboard Bedford Hospital

Appendix C – Priorities dashboard SEPT

Background Papers: (open to public inspection)

Quality Accounts: [a guide for Overview and Scrutiny Committees](#)

Luton and Dunstable University Hospital NHS Foundation Trust's Quality Account 2013/14

Bedford Hospital NHS Trust's Quality Account 2013/14

SEPT's Quality Account 2013/14

Location of papers: Priory House, Chicksands

Quality Accounts Data Set – Luton & Dunstable (2013/14)		
Priority	Target Areas	RAG
Priority 1: Patient Safety	Ensure that we have the appropriate level of clinical expertise available to deliver safe and effective care 24/7	Green
	Ongoing development of Safety Thermometer, exceeding performance year on year	Green
Priority 2: Patient experience	Revolutionise how we handle complaints	Amber
	Continue to implement the Outpatient Transformation programme	Amber
Priority 3: Clinical outcome	Improve performance by reducing average length of stay for older people	Green
	Improve performance on overall hospital mortality across fractured neck of femur and all specialities	Green

Quality Accounts Data Set – Luton & Dunstable (2014/15)		How it will be measured
Priority 1: Patient safety	<p>Target areas</p> <ul style="list-style-type: none"> Ensure that we have the appropriate level of clinical expertise available to deliver consistent inpatient care irrespective of the day of the week Roll out the Perfect Day across the hospital Ongoing development of Safety Thermometer, improving performance year on year 	<ul style="list-style-type: none"> Rapid and appropriate decision making through timely investigations. Improved safety, fewer errors. Improved outcomes through improved diagnosis and appropriate treatment. Improved patient experience due to appropriate and skilled clinicians and availability of information. Improved supervision and training of junior doctors. Timely discharge planning. Improved patient experience scores. Reduced complaints. Improved nursing metrics. Improved staff experience. 15% reduction in the prevalence of hospital acquired, avoidable grade 2 and 3 pressure ulcers 5% reduction in the proportion of patients with harm from a fall Deliver a 5% reduction in the proportion of patients with a urinary catheter Maintain 95% (minimum) patients to have had a VTE risk assessment on admission Undertake Root Cause Analysis (RCA) on all cases of hospital associated thrombosis where known
	<p>Improve the management of the deteriorating patient</p>	<ul style="list-style-type: none"> Improvement of 50% on the baseline for the following measures: <ul style="list-style-type: none"> Timely and appropriate observations Appropriate and timely escalation when a patient is deteriorating Timely medical response as a result of escalation of concerns Effective action to prevent further deterioration Reduction in number of cardiac arrests Implementation of the ePMA system across all inpatient areas, excluding maternity. Reduction in the types of interventions and a move to targeted specialist support from pharmacy. 50% reduction in number of transcribing errors. 50% reduction in missed doses. 20% reduction in the time to deliver the end to end TTA process. Ability to derive accurate patient level drug costs. 50% improvement with adherence to IV to oral switching and duration. Reliable capturing of allergy alerts on admission.
Priority 2: Patient Experience	<p>Revolutionise the outpatient booking system</p>	<ul style="list-style-type: none"> Improved feedback via Friends and Family test and participation in a locally commissioned Healthwatch Luton survey being conducted in Outpatients. Improvement in the National Outpatient Experience Survey. Achieve 2% consistent reduction in Do Not Attend (DNA) appointment rates. Achieve 90% rebooking of recyclable patient initiated cancelled appointments. Achieve a further reduction of 50% in the number of patients experiencing hospital initiated clinic cancellations.

	<ul style="list-style-type: none"> Continue to improve Outpatient environment and facilities. Increased patient choice in scheduling of new and follow up appointments, with 90% of patients requiring follow up leaving with their appointment booked. Reduced delays in clinics with 90% of patients seen within 30 minutes of their scheduled appointment time. Achieve faster Outpatient call centre response times – 95% calls responded to in less than 30 seconds. 	
	<ul style="list-style-type: none"> Reduce waiting times for routine scans in CT, MRI and Ultrasound from current 6 weeks targets to 2 weeks by Q4 2014. To ensure all 2 'week wait' patients are appointed to agreed Key Performance Indicators (KPIs). Reduce waiting times to other modalities to be consistently under 6 weeks. To ensure all routine scans are reported to agreed KPIs. Meeting emergency imaging and reporting requirements as per trauma network accreditation standards. 	<ul style="list-style-type: none"> Decrease diagnostic wait times
	<ul style="list-style-type: none"> Delivery of the locally agreed 'end of life' CQUIN scheme for 2014/15. Evidence of symptom control. Evidence of conversations with the families and or patient regarding their care and preferences. Evidence of support for families. Presence of a DNAR and personal resuscitation plan in the patient records. 	<ul style="list-style-type: none"> Improve the experience and care of patients at the end of life and the experience for their families.
Priority 3: Clinical Outcomes	<ul style="list-style-type: none"> Improved management of the patient with AKI as evidenced through audit. Reduction in the number of patients who require renal support. 	<ul style="list-style-type: none"> Implement earlier recognition of Acute kidney injury (AKI) illness severity and earlier senior clinical involvement
	<ul style="list-style-type: none"> Improved patient care and experience. Improved accessibility and responsiveness of services. Reduction in overall levels of unplanned admissions and hospital attendances of older people. Reduction in delayed transfers of care. Once the patient is medically stable they are discharged to the appropriate care setting. Improvement in planned hospital admissions, admissions are both planned and managed between the community MDT team and hospital geriatrician. Reduction in the number of re-admissions to hospital within 30 days as the right packages of care are available within the community setting. Reduction in hospital LOS – patients follow a planned admission pathway into the hospital for treatment and once medically stable, follow a planned discharge pathway to the appropriate community setting. 	<ul style="list-style-type: none"> Implement a new model of integrated care for older people

A full version of the Quality account can be downloaded as a background paper from the following link
<link to modern.gov>

Quality Accounts Data Sets – Bedford Hospital NHS Trust

Appendix B

Quality Account 2013/14		
Priority	Targets	RAG
Patient Safety Priority: Reduce Infections	Reduce MRSA Bacteraemia infections to 0 cases	
	Reduce <i>Clostridium difficile</i> infections to less than 15 cases	
	Isolate 80 percent of patients with suspected infectious diarrhoea within two hours	Achieved in 3 out of 12 months
Patient Experience Priority: Achieve improvements in the areas of most concern to patients	Achieve a 2.5 percent increase in positive responses to question: Did a member of staff tell you about medication side effects to watch out for when you went home?	* First line of Table 1 in the Quality Account contains an error. Amended table attached.
	Achieve a 2.5 percent increase in positive responses to question: Did hospital staff tell you who to contact if you were worried about your condition or treatment after you left hospital?	
	Increase Friends and Family Test score by 10 points to 70	Actual score: 59
	Improve noise at night	Improvement in noise from staff but decline in noise from other patients
	Improve the discharge process	
Clinical Effectiveness Priority: Prevent avoidable deaths	Reduce hospital-wide mortality	
	Reduce mortality rates per speciality	Mortality reduced in all specialities except Women and Children. Mortality rate in this speciality was higher than expected due to the deaths of three babies born before 22 weeks.
	Regularly review speciality-level quality indicators	

Quality Account 2014/15			
Priority	Targets	Measurement	
Patient Safety Priority: Improve care for patients whose condition is deteriorating	Reduce the number of avoidable cardiac arrests	Number of avoidable cardiac arrests	
Patient Experience Priority: Treat our patients with dignity and respect and improve the way in which we communicate with our patients	Achieve a 2 percent increase in inpatient survey scores for:	Results of 2014 Picker Institute Inpatient Survey	
	<ul style="list-style-type: none"> Patients feel they have enough privacy and dignity when discussing their conditions and treatment Patients feel they receive enough emotional support from our staff Staff respond to call bells within five minutes Patients feel more involved in decisions Patients have more time to discuss operations/procedures with consultant Patients feel their questions have been fully answered Patients are told how to expect to feel after an operation/procedure Patients are told what would be done during an operation/procedure 		
	10 percent reduction in readmissions within seven days of discharge	Number of readmissions	
	20 percent reduction in the number of readmissions within 28 days of discharge	Number of readmissions within 28 days	
	Clinical Effectiveness Priority: Reduce the number of patients who need to be readmitted to hospital		

Quality Accounts Data Sets – Bedford Hospital NHS Trust

Table 1: Progress in achieving our patient experience priority targets for 2013/14

Target	Performance in 2012	Performance in 2013	Target achieved?	Commentary
2.5 point increase in positive response to “Did a member of staff tell you about medication side effects to watch out for when you went home?”	65 percent	62 percent	Yes	Results from Picker Institute National Inpatient Survey July 2013. The decrease from 65 percent to 62 percent represents a decline in patients reporting that they were <u>not</u> told about medication side effects. This represents an improvement on our 2012/13 performance and the target was achieved.
2.5 point increase in positive responses to “Did hospital staff tell you who to contact if you were worried about your condition or treatment after you left hospital?”	23 percent	22 percent	No	Results from Picker Institute National Inpatient Survey July 2013. The decrease from 23 percent to 22 percent represents a decline in patients reporting that they were <u>not</u> informed to medication side effects. This represents an improvement on our 2012/13 performance but the target was not achieved.
Increase Friends and Family Test score by 10 points to 70	60	59	No	In 2013/14 we extended the Friends and Family Test to include A&E attendances in addition to inpatients. This increased the survey size from 500 to approximately 3500. The score of 59 is the result from the inpatient element of the survey. When the A&E element is included the 2013/14 FFT score reduces to 50.
Improve the areas of most concern to patients: noise at night from staff	24 percent	19 percent	Yes	Results from Picker Institute National Inpatient Survey July 2013. The decrease from 24 percent to 19 percent represents a decline in patients reporting that they were <u>not</u> bothered by noise from staff at night.
Improve the areas of most concern to patients: noise at night from other patients	43 percent	45 percent	No	Results from Picker Institute National Inpatient Survey July 2013. The increase from 43 percent to 45 percent represents an increase in patients reporting that they were bothered by noise from other patients at night.
Improve the areas of most concern to patients: discharge process	40.7 percent	39.5 percent	Yes	Results from Picker Institute National Inpatient Survey July 2013. Performance figure is based on the average of 19 questions relating to the discharge process. The decrease from 40.7 percent to 39.5 percent represents a decline in patients reporting negatively on their experience of leaving hospital.

Quality Report / Account 2013/14 Dashboard – South Essex Partnership NHS Foundation Trust
(summarises Trust-wide performance against quality priorities)

Quality Accounts Data Set – SEPT 2013/14		RAG
Priority 1: Effectiveness Physical Healthcare Improving competencies in monitoring, measurement and interpretation of vital signs within elderly mental health inpatient areas.	Target areas Development of competency framework for clinical staff.	Green
	Baseline audit and % improvement by March 2014.	Green
Priority 2: Safety Pressure Ulcers To reduce the number of avoidable category 2, 3 and 4 pressure ulcers.	Target areas To sustain and improve on the work undertaken during 2012/13 in reducing avoidable category 3 and 4 pressure ulcers towards the ambition of no avoidable category 3 and 4 pressure ulcers.	RAG Green * Subject to outcome of 69 root cause analyses currently being undertaken
	To identify a baseline for category 2 avoidable pressure ulcers and achieve reduction by March 2014.	Green

Priority 3: Safety Falls Reduce the level of avoidable falls resulting in harm.	Target areas To achieve a year on year reduction (compared to 2012/13) in the number of avoidable falls that resulted in severe harm.	Green
	To increase reporting of no/minimal harm falls.	Amber
Priority 4: Experience Carers To provide better support for carers by mental health and community health services.	Target areas To increase the number of clinical staff trained to undertake the 3 R's (Recognise, Record and Refer carers to appropriate services).	Green
	Priority 5: Experience Improved Patient Experience To promote continuous reflection and improvement on practice through regular patient feedback mechanisms.	Target areas To introduce a patient and carer feedback and reporting system (including the NHS Friends and Family Test) across the organisation, enabling staff to receive regular commentary on their service from an end user perspective.

Quality Report / Account 2013/14 Dashboard – South Essex Partnership NHS Foundation Trust
(summarises Trust-wide performance against quality priorities)

Quality Accounts Data Set – SEPT 2014/15		
Priority 1: Effectiveness	Target areas	Measurement
Restrictive Practice To reduce the number of restrictive practices undertaken across the Trust.	We will have less prone restraints in 2014/15 compared to 2013/14.	Number of prone restraints.
Priority 2: Safety	Target areas	Measurement
Pressure Ulcers To further reduce the number of avoidable grade 3 and 4 pressure ulcers acquired in our care.	We will have less avoidable grade 3 and 4 pressure ulcers acquired in our care in 2014/15 compared to 2013/14.	Number of avoidable grade 3 and 4 pressure ulcers acquired in our care.
Priority 3: Safety	Target areas	Measurement
Falls To reduce the number of avoidable falls that result in moderate or severe harm within inpatients areas.	We will have less avoidable falls that result in moderate or severe harm in 2014/15 compared to 2013/14.	Number of avoidable falls resulting in moderate or severe harm

Priority 4: Experience	Target areas	Measurement
Improved patient experience To improve the overall patient experience.	We will reduce the percentage of negative responders (ie those scoring “extremely unlikely” and “unlikely” to recommend in response to the Friends and Family Test question) in 2014/15 compared to 2013/14.	Percentage of negative responders to the Friends and Family Test question.

Meeting: Social Care Health and Housing Overview & Scrutiny Committee
Date: 12 May 2014
Subject: Your Health in Central Bedfordshire; Bedfordshire Plan for Patients 2014-2016

Report of: Dr Diane Bell, Director of Strategy & Redesign Bedfordshire CCG

Summary: This paper provides a summary of the national requirement for the development of a two year operational Clinical Commissioning Plan. It is accompanied by a copy of *Your Health in Central Bedfordshire*, which reflects BCCG's two year operational plan for Central Bedfordshire.

Advising Officer(s): Dr Diane Bell, Director of Strategy & Redesign

Public/Exempt: Public

Wards Affected: All

Function of: Council

CORPORATE IMPLICATIONS

Council Priorities:

Implementation of this plan will promote the health and wellbeing of Central Bedfordshire residents.

Financial:

The financial savings requirement for BCCG in 2014/15 is £12million or 2.7% and £7million or 1.5% in 2015/16.

Legal:

In accordance with the Health and Social Care Act (2012), Clinical Commissioning Groups have a statutory requirement to prepare a Commissioning Plan before the start of each financial year.

The Bedfordshire Plan for Patients 2014-16 is a detailed, technical document which describes our two year operating and financial plans and includes Central Bedfordshire Council's Better Care Fund Plans. These plans have been shared with our healthcare provider organisations and NHS England Area Team to support a collaborative approach to developing local healthcare organisation plans.

NHS England will seek assurance of clear and credible plans that encompass our nationally directed system 'unit' of planning.

The system unit of planning includes;

- BCCG
- Bedford Hospital Trust
- Luton and Dunstable University Hospital Foundation Trust
- South Essex Partnership Trust
- Central Bedfordshire Council and Bedford Borough Council

This technical document is published on BCCG's website (www.bedfordshireccg.nhs.uk) and copies are available upon request.

Your Health in Central Bedfordshire reflects BCCG's operational plan 2014-16 for Central Bedfordshire patients.

Risk Management:

Higher level risks associated with Bedfordshire Plan for Patients 2014-2016 are described in the technical plan. Risks will be managed in accordance with BCCG's Risk Management and Assurance Framework (June 2013).

Staffing (including Trades Unions):

An overview of workforce implications are described within the resource implications section of the technical plan.

Equalities/Human Rights:

Our approach to Equality and Diversity duties is described within the technical plan. The reviews and projects that will arise as a result of this plan will each undertake their own equality analysis (as per BCCG's Planning and Delivery Framework), and address any potential inequalities appropriately.

Community Safety:

No implications specific to the overall plan, however, initiatives described within it provide opportunities to promote community safety e.g. the mental health procurement of a stepped model of mental health care seeks to address concerns for police and probation and establish partnership working with Mental Health services.

Sustainability:

BCCGs operational plan encompasses details of the development of the Central Bedfordshire Better Care Fund Plan and the current Bedfordshire and Milton Keynes Healthcare Review. The outcomes for both these work programmes are anticipated to improve sustainability and raise quality across health and care systems.

RECOMMENDATION(S):

1. **that the committee:**
 - (a) **Receive the report**
 - (b) **Provide feedback in relation to the level of engagement that has taken place.**

Strategy Implications

1. BCCG has developed a set of priorities for the healthcare we commission that are in keeping with Central Bedfordshire's Health and Wellbeing strategy. Over the next two years we want to commission local services that:
 - help children and young people receive a healthy start to a healthy life
 - enable adults and older people to remain healthy
 - support mental health and wellbeing for everyone in Central Bedfordshire.
2. To enable the Health and Wellbeing Board, the Overview and Scrutiny Committee and other stakeholders, to monitor these priorities we have developed a set of health outcomes against which we can be measured. These can be seen on p4 of *Your Health in Central Bedfordshire*. Most are nationally set outcomes, to which we have added a local outcome around improving end of life care.
3. *Your Health in Central Bedfordshire* is aligned to the priorities described within Central Bedfordshire Joint Strategic Needs Assessment and Health and Wellbeing Strategy.

Governance & Delivery

4. Everyone Counts: Planning for Patients 2014/15 to 2018/19, published on 19 December 2013 sets out the planning parameters for NHS Commissioners. This national planning guidance recognises that the Health and Wellbeing Board is a key governance forum for plan authorisation. Central Bedfordshire Health and Wellbeing Board approved *Your Health in Central Bedfordshire* and the Bedfordshire wide technical operational plan on 3rd April 2014.
5. Progress reports will be tailored to individual initiatives and provided to the Health and Wellbeing Board and the Overview and Scrutiny Committee at regular intervals.

6. BCCGs internal processes for assuring governance and delivery are described in detail in the technical plan

Working with Patients, service users and the public to develop our plans

7. To ensure patients have influenced the development of the Plan for Patients BCCG have held specific events and activities. These have included deliberative events and some wider engagement events.

(a) **Developing our 2020 Vision**

Two deliberative events held in June 2013 built upon the emerging themes captured during early planning workshops with our locality GPs and staff, and our programme boards. A public event was attended by 70 patients, carers, community representatives and members of the public. Meanwhile, a care organisation event drew on the expertise of clinicians and managers from our local hospitals, community and social care services and charities/voluntary organisations. The purpose of these events was to listen to, understand and act on the views of our local communities and organisations in relation to three key areas:

- their vision for healthcare services in Bedfordshire in 2020
- the building blocks that need to be put into place to realise this vision
- what needs to happen in 2014-15 – what are the first building blocks

A report of these deliberative events – *20:20 Vision* – is available on the publications section of our website: www.bedfordshireccg.nhs.uk. Also available on the website is a copy of our *Commissioning Intentions 2014-15*, which sets out how these events informed this plan and our longer-term strategy.

(b) **Working with our patient participation groups and public membership**

Throughout the development of the plan we have actively sought the views and feedback of each of our five locality patient participation groups. Our engagement initiatives have ranged from virtual feedback on our plans to a large interactive event where representatives from GP practices and support groups for patients with long-term conditions were asked to feedback on our plans and to describe what excellence looked like to them in relation to health services.

We also set up two task and finish groups – called editorial advisory groups – which enlisted the help of public members to help us develop *Your Health in Central Bedfordshire*

The advisory group was actively involved in informing the look and feel, content and language of *Your Health in Central Bedfordshire*

(c) **Wider Engagement**

Our overall approach to working with patients and the public is described in detail in the technical plan. Our commitment to excellent engagement is embedded within our internal processes for implementing our plans. Any planned change to patient pathways or health care services involves significant levels of engagement with patients, carers and the public. It is a requirement of our business case assurance process that we can evidence that patient and public engagement is planned to be undertaken and a member of the communications team is part of the panel that will assess the level of engagement activity. The Overview and Scrutiny Committee has previously received reports demonstrating the depth of engagement undertaken for specific initiatives such as Mental Health Services Procurement and Musculoskeletal Service changes, regular reports in relation to individual planned changes will continue to be provided to the Overview and Scrutiny Committee.

(d) **Public Engagement Forum**

Prior to approval by the Governing Body, the Plan for Patients 2014-16 is ratified by our Public Engagement Forum which ensures we have fulfilled our responsibility to engage our patient and public with the development of our plans.

Appendices:

Appendix A – Your Health in Central Bedfordshire

Background Papers: (open to public inspection)

Deliberative Events Report: *20:20 Vision*

Commissioning Intentions 2014 – 15

Technical Operational Plan: Bedfordshire Plan for Patients 2014 -2016

Location of papers: www.bedfordshireccg.nhs.uk

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Appendix A



**Bedfordshire
Clinical Commissioning Group**



Your Health in Central Bedfordshire

Our plans for the people of Central Bedfordshire
2014-16

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Foreword



Welcome to *Your Health in Central Bedfordshire*.

Here you will find out about Bedfordshire Clinical Commissioning Group – who we are, what we do and, most importantly, our healthcare plans for you and our community. It sets out our vision to improve the health and wellbeing of the residents of Central Bedfordshire and our commitment to ensure that health services are safe and you receive the highest quality care.

Our plans also reflect the priorities of the Central Bedfordshire Health and Wellbeing Board. This brings together local health services – hospitals, community health services, GPs – and social services with representatives of the public to maintain and improve services. Working together is key to the success of our healthcare plans for Central Bedfordshire. Together we want to ensure it is a place where everyone can enjoy a healthy, safe and fulfilling life.

As a local GP, I am proud to have been involved in setting up and developing our local clinical commissioning group. We have achieved much in our first year but there is still much to do. A major challenge over the coming year will be the review of healthcare in Bedfordshire that we're leading, which looks at our hospitals and community health services. It won't change our plans for you but it may change how some of them are delivered. We will be involving patients and the public in any decisions we take as a result of the review.

Indeed, listening to and learning from our patients is central to all our work including producing this booklet. I would like to thank everyone who has been involved in helping us develop our healthcare plans and, in particular, those who sat on our editorial advisory group for *Your Health in Central Bedfordshire*.

Towards the back you will find a list of the many ways in which you too can be involved in what we do. Please take advantage of them and keep telling us what you want from your local health services.

Dr Paul Hassan

Chief clinical officer

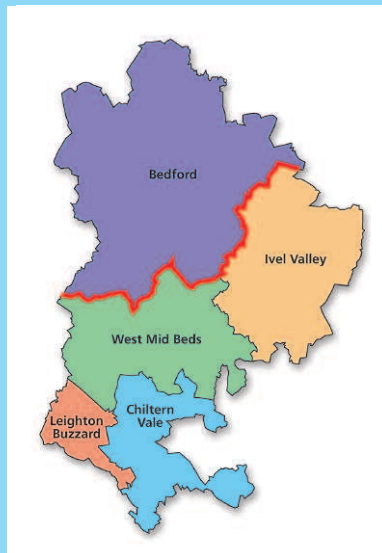
Bedfordshire Clinical Commissioning Group

Who are we?

Bedfordshire Clinical Commissioning Group (BCCG) is responsible for planning, organising and buying NHS-funded healthcare for the 441,000 people who live in Bedfordshire. We have a budget of £444m to spend on local health services including hospital care, community health services and mental health services. We do not fund the contracts for GPs, dentists, opticians or pharmacists; these are managed by NHS England.

BCCG is run by local GPs, nurses and other clinicians – the men and women working on the frontline with patients who are ideally placed to understand local health needs. We were set up in April 2013 when we took over these commissioning responsibilities from what was the primary care trust.

All 55 GP practices in Bedfordshire are members of BCCG which is divided into five areas, which we call localities. As the map shows, four of these localities are in Central Bedfordshire:



- Ivel Valley
- Leighton Buzzard
- Chiltern Vale
- West Mid Beds

There is a BCCG team in each locality working with local GP practices and ensuring that we remain in constant touch with local patients and their health needs.

Further information

- Find out more about how BCCG is organised and governed on our website: www.bedfordshireccg.nhs.uk
- Want to know more about CCGs and how they fit into the rest of the health service? Go to NHS Choices - www.nhs.uk - for more information. Or go to www.gov.uk/government/publications/the-health-and-care-system-explained

Glossary

If there are any words or phrases you don't understand, or look like health service jargon, see our glossary on p17.



Our priorities for you

We have set ourselves a clear purpose:

'To ensure, through innovative, responsive and effective clinical commissioning that our population has access to the highest quality healthcare providing the best patient experience possible within available resources.'

Working in partnership with our hospitals, community health services, GP practices, Central Bedfordshire Council, patient groups and the public, we have developed a set of priorities for the healthcare we commission. Over the next two years, we want local health services to:

- help children and young people receive a healthy start to a healthy life
- enable adults and older people to remain healthy
- support mental health and wellbeing for everyone in Bedfordshire.

As well as meeting our own aim for the people of Central Bedfordshire, these will help to fulfil the vision of the Central Bedfordshire Health and Wellbeing Board, of which we are members, to make this a place where everyone can enjoy a healthy, safe and fulfilling life.

We have also developed a set of health outcomes or targets against which we can be measured and which we think will deliver this aim. These cover:

- preventing people from dying prematurely from physical and mental health conditions that are treatable such as heart disease

- enhancing the quality of life for people with long-term conditions, including diabetes and dementia
- reducing the amount of time people spend in hospital that is avoidable with better and more joined up care in the community
- increasing the number of older people living independently at home following discharge from hospital
- ensuring people have a positive experience of care, whether it is in hospital, the community or through their GP practice
- reducing the number of deaths in hospital that are the result of poor or inappropriate care
- reducing emergency admissions as part of end of life care, enabling more people to die at home if that is their wish.

In the section **What you can expect from us**, we set out some of the services we will commission over the next two years to help deliver these health outcomes for local people. Meanwhile, the charts on pp6-7 set out some of our detailed targets which will show that we are delivering these outcomes for patients.



Review of healthcare in Bedfordshire

A major review of healthcare in Bedfordshire and Milton Keynes is underway to explore how services might adapt and change in the future.

It is led by Bedfordshire CCG and Milton Keynes CCG with support from NHS England and the health regulators, Monitor and the Trust Development Agency. Local patients, patient groups, nurses and doctors, national clinical experts and local politicians are all taking part.

The review won't change or delay our plans for improving services for you but it may alter how some of them are delivered. Patients and the public will be involved in any decisions we take once the review is complete.

You can find out more about the review at www.yourhealthinbedfordshire.co.uk

Further information

Check out our corporate priorities in our Plan for Patients 2014-16. It is available on our website www.bedfordshireccg.nhs.uk

About you

Our plans for local healthcare are based on the local health needs assessment that Central Bedfordshire Council has published. From this we know that:

- It is a growing population and is expected to reach 303,000 by 2031. The biggest increase will be in the number of people aged 65 and over – this is expected to rise by 87%.
- It is a rural population. More than half of the 255,000 who live in Central Bedfordshire live in rural areas.
- There are sizeable health inequalities in the area. For example, men in the richest parts of Central Bedfordshire can expect to live more than seven years longer than their poorer peers.
- Over the past 10 years, early deaths from cancer, heart disease and stroke have fallen but the number of road injuries and deaths remains higher than the national average.

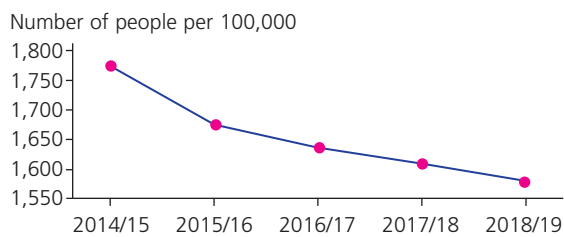
Source: Joint Strategic Needs Assessment, Central Bedfordshire



Our healthcare targets

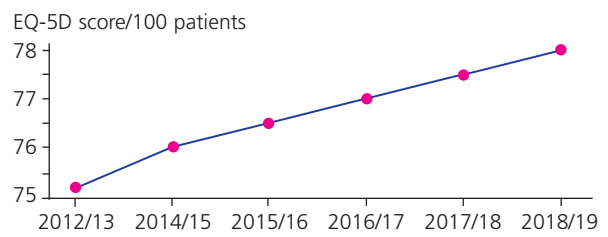
Here are some of the targets we have set to help demonstrate what we will achieve for patients.

Figure 1 Preventing people from dying prematurely from treatable physical and mental health conditions



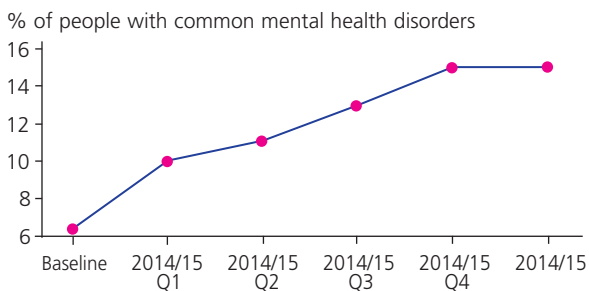
In 2014/15, we aim to reduce the number of people dying prematurely from preventable conditions from the current rate of 1,778 per 100,000 people to 1,721 per 100,000 – a reduction of 3.2%.
By 2018/19, we aim to reduce the number to 1,579 per 100,000. This would represent a reduction of 11.2% over five years.

Figure 2 Enhancing the quality of life for people with long-term conditions



Our aim is to improve the quality of life for people with long-term conditions. We calculate this by using a range of measures, such as mobility, self-care and pain/discomfort, known as the EQ-5D score. In 2012/13, our score was 75.2. Our aim is to increase it to 78 by 2018/19 at a rate of 0.5 points per year.

Figure 3 Access to talking therapies

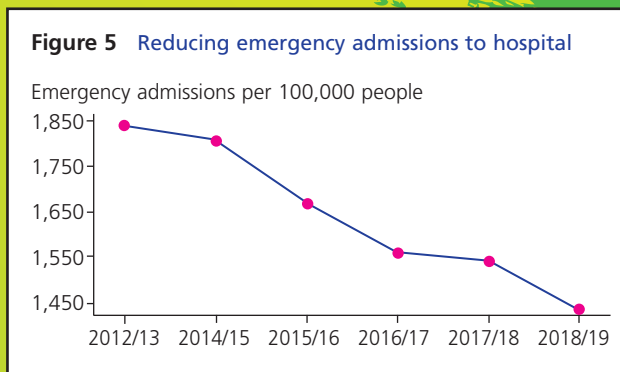


Increasing access to talking therapies such as counselling for people with anxiety or depression is another means of improving the quality of life for people with long-term conditions.

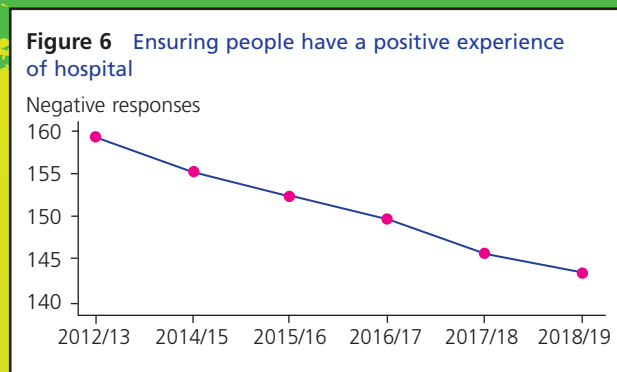
Figure 4 Diagnosing dementia

Population of Bedfordshire	Number of people	Prevalence of dementia diagnosed	% diagnosis rate
2014/15	3226	4815	67%
2015/16	3339	4911	68%

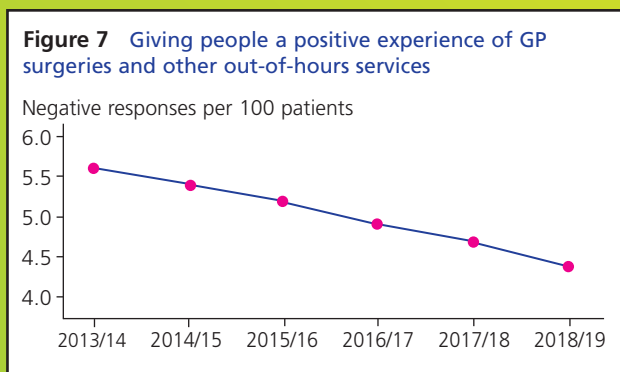
Recognising and treating dementia more quickly will be a further means of improving quality of life for people in Bedfordshire. Our current dementia diagnosis rate in 2013/14 is 49%. We aim to increase it to 68% in 2015/16.



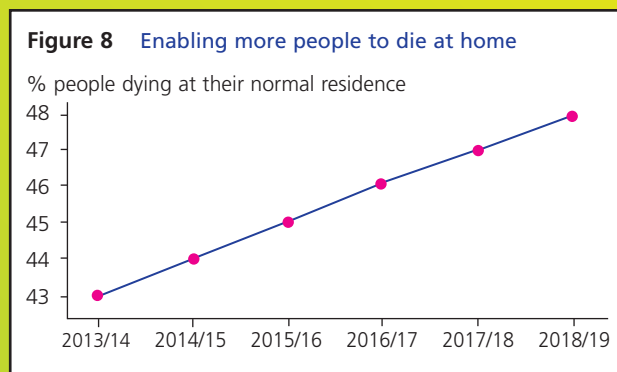
Cutting the number of emergency admissions through more joined up care in the community is an indicator of our ability to reduce the time people spend avoidably in hospital.



The above data is taken from the National Inpatient Survey which asks each patient 15 separate questions. The score is based on the number of negative responses to all these questions per 100 patients responding.



Patients in Bedfordshire are very satisfied with their GP surgeries. But we want to further reduce negative patient experience to 4.4 responses per 100 patients by 2018/19.



By 2018/19 we want 48% of people who wish to die at home - or their normal residence - to be able to do so.

Working with Central Bedfordshire Council

One of our priorities for the coming year is to work more closely with Central Bedfordshire Council which is responsible for public health and social care. Patients and public have said they want to see a seamless service between social care and health care. Our GPs want this too.

We already have mechanisms for working together through, for example, the public health team and our membership of the Central Bedfordshire Health and Wellbeing Board. We also work in partnership on such things as standards of care in local care homes and adult and children safeguarding issues.

Meanwhile, through Central Bedfordshire Council's scrutiny processes, we keep local councillors up-to-date with our health plans and activities so they can assure themselves that we are helping to deliver the Central Bedfordshire health and wellbeing strategy.

Starting next year – 2015 – we will take our partnership a stage further by pooling some of our resources. Called the Better Care Fund, this will enable us to work together to improve the lives of some of our most vulnerable residents. Working with the council, we have identified programmes which we will support through the Better Care Fund. They include:

- reshaping health prevention and early intervention services by enabling local health and social services to work together more closely
- supporting people with long-term conditions to manage their own health in the community by developing multi-disciplinary health and social care networks around GP surgeries
- expanding the range of services available to support frail, older people – including housing, mobility and personal care services
- ensuring patients can transfer seamlessly from hospitals to care at home and in the community.

Further information

Go to www.local.gov.uk for more information on the Better Care Fund.

For Central Bedfordshire's health and wellbeing strategy go to www.centralbedfordshire.gov.uk



Safety first

Patients should and do expect to receive high quality, safe care from the NHS whether in hospital or the community. However, recent inquiries into patient safety in hospitals and care homes have rocked people's faith in the NHS's ability to guarantee this.

We have therefore, put quality and safety for our patients at the core of the services we commission. And we encourage all local healthcare staff to demonstrate what we call the 'six Cs': care, compassion, competence, communication, courage and commitment.

We use a variety of ways to monitor the quality and safety of care that our hospital and community providers offer. We do this by:

- making unannounced visits and inspections
- receiving regular data on aspects of patient care and acting on any concerns immediately
- gathering feedback from staff and patients through, for example, complaints procedures and the Friends and Family Test
- developing systems that will enable healthcare staff to raise any quality concerns directly with us.

We all need friends

The Friends and Family Test (FFT) asks patients if they would recommend healthcare they have just received to a friend or relative. It was recently introduced into some hospital services and will be extended to mental health services and GP practices later this year (2014).

Find out more about FFT by going to NHS Choices – www.nhs.uk – and searching on Friends and Family Test.

Staying iNformed

BCCG has recently launched an online reporting system for local GPs and their staff to raise any concerns they have about the quality of care their patients receive. It's called Yellow iNform and will be rolled out to local hospitals and community services over the coming year.



Blue iNform does something similar for the public. It enables patients to raise any concerns, make a comment or ask us a question and is available on the home page of our website www.bedfordshireccg.nhs.uk





Our progress so far

This booklet is primarily about what we will deliver for patients in the coming two years. But here are some of the things we have done during our first year to improve services for people in Central Bedfordshire:

- **Modernising musculoskeletal care**

One in ten of our population suffers from musculoskeletal conditions such as back or joint pain, arthritis, tennis elbow or carpal tunnel syndrome. We are investing £120m over the next five years in developing a service that will enable patients to receive more treatment closer to home.

- **Support for adults with autism**

Adults who are suspected of having autism can now be assessed and diagnosed locally. Around 100 people – who would previously have had to travel to London – have benefited from this service.

- **Chronic fatigue services**

A multi-disciplinary team – including a rheumatologist, psychologist, physiotherapist and occupational therapist – runs regular clinics in Dunstable for people with chronic fatigue syndrome. Patients no longer have to make multiple appointments or travel out of the county for specialist care. By the end of the year, the team had already received 125 referrals.

- **Expanding access to counselling**

Talking therapies, such as counselling, which encourage people to explore their negative feelings, are a proven means of helping people with mild to moderate mental health issues. Last year we

provided further training for our local counsellors to help them to provide even more effective therapies to local patients.

- **Enhancing services for people with diabetes**

We worked with local pharmacists to help people with diabetes use more cost-effective blood glucose meters and manage their care with fewer visits to their GP.

- **Seeking patient views**

We have piloted the government's Friends and Family Test with our GP practices, asking patients for their views. By the end of December 2013 more than two in three patients said they were extremely likely to recommend their GP practice to a friend or family member.

- **Children's health services at Bedford Hospital**

Many families struggled to cope when Bedford Hospital suspended most children's health services last summer. We responded by working closely with our GPs and surrounding hospitals to develop alternative services. We monitored these changes daily, immediately following up individual cases that caused us concern. Many services have now returned to the hospital but at the end of this year local people will be consulted on further improvements to children's healthcare.

What you can expect from us

We have divided our work into three areas which we consider will best help us deliver high quality, safe services that meet local health needs and are accessible close to people's homes. They are:

- children's and young people's services, including maternity care
- adult services – which includes emergency care, planned treatment and healthcare for older people and people with long-term conditions
- mental health services, including dementia care.

Children's health

Our priority for children and young people is to ensure every child in Central Bedfordshire gets a healthy start to a healthy life.

Key to this is getting everyone who works with children's health and wellbeing working together. Over the next two years we will, therefore, work more closely with Central Bedfordshire social services, local hospitals, community health services, and the child and adolescent mental health team.

Our aim is for GPs to work in a multi-disciplinary team with nurses, social workers and other professionals to offer support early and manage most healthcare issues locally. They will be able to call on specialist help and care when it is needed.

Over the next two years, we will do the following to enable children and young people to begin and lead a healthy life. We will:

- integrate social care and health services so that local children, young people and families do not feel bounced from one service to another

- ensure children and young people can move smoothly between hospital services and those provided in the community or by their GP – thus reducing unnecessary visits to hospital
- improve young people's experience when they move from children's to adult services – especially young patients who have been using the child and adolescent mental health services (CAMHS)
- provide mothers in Central Bedfordshire with a consistent level of care by ensuring all their information and details are shared with their GP practice when they leave hospital after giving birth
- include the review of paediatric care started last year within the wider review of local health services.





Adults and older people

As with healthcare for children and young people, we see closer working between social services, community and hospital care and GPs as key to ensuring adults and older people in Central Bedfordshire remain healthy.

An ageing population inevitably means that more of us are developing multiple, often complex mental and physical conditions that require a range of support from lifestyle help to hospital care. This means building care around the patient and is what we are trying to achieve in, for example, end of life care.

Our other aims for adults and older people are to ensure they have access to high quality emergency care and to improve the quality of planned treatment they receive with more care delivered as close to home as possible.

To achieve these aims we will:

- improve the health-related quality of life for people with long-term conditions through for example, our new musculoskeletal service
- reduce the time people spend in hospital by offering more joined-up care in the community
- increase the number of older people living independently at home following hospital care by working more closely with social services
- increase the number of high-risk patients with long-term conditions who have an individual care plan
- reduce the number of emergency admissions for conditions that should not require a hospital stay by offering more support in the home and community.



Family doctors

NHS England is leading plans to transform the way GPs provide services for their patients. In line with this change we envisage GPs in Central Bedfordshire playing a key part in how care outside hospital is joined up through working closely with social services, community and hospital care. They have a vital role in, for example, co-ordinating the care provided by different services and specialists for people with long-term conditions, or enabling fast access to high-quality care locally for people who might otherwise resort to A&E.

To support this work, our plans for this year include developing common systems for planning care across all GP practices, a development programme for practice staff and improvements to patient information.



Relieving the pressure on A&E

Dealing with rising demand for A&E is a serious local as well as national issue. Over the winter we have been part of a working party that brings all the elements of the emergency care system together – Bedford Hospital, community services, the ambulance service and Central Bedfordshire Council.

The group meets weekly and has delivered several initiatives to ensure no one has to wait more than four hours for emergency hospital care. Some of these have been designed to get people out of hospital more quickly and some – such as extended hours in local GP surgeries – have been designed to give people an alternative to A&E. We have also run an extensive campaign called 'Is A&E for Me?' to raise people's awareness of the alternatives to A&E, including their GP or even their local pharmacy.

The success of the working group has encouraged us to continue through the spring and summer so that we can sustain these improvements and keep a firm grip on the emergency care system. We have also recently introduced NHS 111 to Bedfordshire (see p14) which we will be developing later this year.





When it's less urgent than 999, call 111

Anyone who lives in, or is visiting, Bedfordshire has a new number to call when they need medical help fast but it's not an emergency, life-threatening situation. The number is 111.



The NHS phone service ensures you receive the right care, from the right person, in the right place, at the right time. When you call, you will be assessed, given advice and directed straightaway to the local services that can help you best. This could be GP, a walk-in centre, community nurse, late-opening pharmacist or, if needed, A&E.

The new number is available 24 hours a day, seven days a week, 365 days a year. Calls from landlines and mobile phones are free.

Mental health

A significant number of people – one in six adults – currently experience mental health problems at some point in their lives. Local figures for Central Bedfordshire show that this is likely to increase.

Therefore, we are developing a model that will enable more patients to be seen earlier and in the community – reducing the need for specialist care. Over the course of this year we will procure health care providers who can deliver this new model of care in 2015. As a result we aim to achieve the following:

- closer working with Central Bedfordshire Council to help identify people's mental health needs early and prevent them getting worse
- an increase in the number of people accessing and benefiting from talking therapies by, for example, restructuring and expanding local counselling services
- improved community support for people living with dementia, and their carers
- more and easier access to information and support for families and carers
- increased support to help people with learning difficulties access mainstream services.

Further information

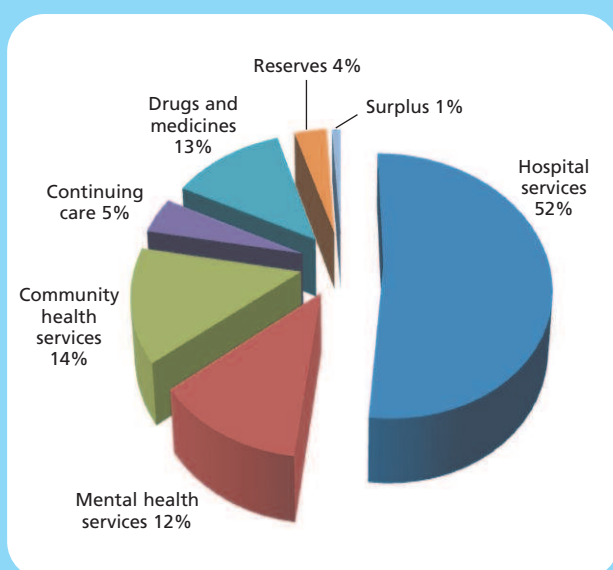
You can read our Mental Health Strategic Objectives 2013-16 at www.bedfordshireccg.nhs.uk

Where the money goes

We have £444m to spend on healthcare in Central Bedfordshire and Bedford Borough next year. Like any organisation, we have to live within our means. We believe we can do this by working with Central Bedfordshire Council our local hospitals and community health providers to deliver more joined-up care, closer to home.

NHS England, which funds us, also expects us to budget for a small surplus.

Our spending plans



Making savings

Like the rest of the health service, we have to use our money efficiently and make savings over the coming two years. In 2014-15 we have to save £12.3m and in 2015-16 we must save a further £6.5m. We will do this by being more efficient and redesigning some of our health services to keep more people out of hospital and treated closer to home. The table below sets out where we will make these savings.

Where we will make savings

£6.2m	<ul style="list-style-type: none"> • Quality and productivity • Medicines optimisation
£3.1m	<ul style="list-style-type: none"> • Improved value
£1.9m	<ul style="list-style-type: none"> • Adults and older people • Children and young people
£1.1m	<ul style="list-style-type: none"> • Mental health
Total £12.3m	<ul style="list-style-type: none"> • Our net savings target for 2014/15

Listening to you

Involving local people in developing our services is vital to their success. For example, to help develop the plans we have outlined in this booklet, we held two workshops – one for clinicians and one for patients.

At these events you told us that you wanted to see more joined up care and more care closer to home with good access to community health services. We have reflected your vision in our plans.

Here are some of the ways in which we listen and learn from people in Central Bedfordshire

- Public membership – we run a public membership scheme for people with a specific interest in local healthcare and how it is delivered. We involve our public members in the Public Engagement Forum (PEF) and we involved them in developing this booklet.
- Stakeholder forum – we developed a stakeholder forum last summer to help us develop ideas for children’s healthcare and are using a similar model as part of the wider review of healthcare across Bedfordshire.
- Patient participation groups (PPGs) – we have encouraged every GP practice in Central Bedfordshire to set up a patient participation group. These are patient groups that meet regularly to discuss how individual practices can improve patient experience.
- Patient network groups – each of our localities has set up a patient network group to draw on the expertise of local PPGs and get an overview of patient experience of local healthcare.
- Social media – we use Twitter, Facebook and our website to find out what people think about local health services.
- Friends and Family Test – we are piloting FFT with our GP surgeries to find out what patients think about their GP service.
- Formal consultation – when we need to make major changes to services, we gather patient views via formal consultation processes such as surveys and focus groups.
- External events – we attend events run by other organisations to let people know what we do and give them a chance to feedback their views. Last year we attended the Full of Life Festival for older people in Flitwick.

Public Engagement Forum (PEF)

The PEF is a subcommittee of our governing body. Its role is to scrutinise our public engagement activities; that is, to ensure we engage and involve local people in our healthcare decisions.

Its members are patient and public representatives from across Central Bedfordshire, including HealthWatch.

Get involved

There are lots of ways to get involved in our work. You can:

- become a public member
- join your local patient reference group
- follow us on twitter @BCCG5
- like us on Facebook www.facebook.com/bedscgg
- phone our advice line 01525 864405.

Find out more by visiting our website: www.bedfordshireccg.nhs.uk

How you know we are delivering

Patients and the public need to know that we will do what we have promised. We have internal systems in place to collect data that confirms we are doing that. We also have to report back to NHS England quarterly on a series of measures. They include:

- Are local people getting good quality care?
- Are patients' rights under the NHS Constitution being promoted?
- Are health outcomes improving for local people?
- Are CCGs delivering services within their financial plans?

These measures are updated on our website at www.bedfordshireccg.nhs.uk, go to About Us and Our Performance.

There are other ways in which you can know our plans are on track. These include:

- The Health and Wellbeing Board – brings together health and social care services in Central Bedfordshire, receives and monitors our plans on a regular basis.
- Health Overview and Scrutiny Committee of Central Bedfordshire Council – we regularly present to local councillors on the HOSC. We are expected to account for our activities and show that we are involving local people in our decision-making.
- Our governing body – this meets in public every month. It involves local GPs and non-executive directors who act as critical friends and scrutinise our decision-making. Meetings are open to staff, press and the public.
- Contracts – we are open about our contracts with NHS organisations. There are over 200 under contract with BCCG to deliver healthcare across Bedfordshire. The details can be read on our website at www.bedfordshireccg.nhs.uk, go to About Us and Our Providers.

Glossary

Clinical commissioning – when local GPs, hospital doctors, nurses and other clinicians take decisions around what healthcare needs to be purchased (commissioned) to meet the health needs of local people.

NHS England – a non-departmental public body of the Department of Health. NHS England oversees the budget, planning, delivery and day-to-day operation of the NHS in England.

Patient participation groups – are groups of volunteer patients from individual GPs surgeries who meet regularly with the practice manager and one or more of the GPs to discuss the service the practice offers and opportunities for improvements for the benefit of patients. They have been running for more than 40 years.

Providers – any organisation with whom BCCG has a contract to provide healthcare such as Bedford Hospital, the Luton & Dunstable Hospital and SEPT, which provides community and mental health services.

Community healthcare – healthcare that is provided out of hospital and in patients' homes or their community, for example district nursing, palliative care and health visiting.

Friends and Family Test – is a survey that asks patients whether they would or would not recommend a health service they have just received to a friend or relative. The FFT 'score' is derived by comparing those who would recommend the service (promoters) with those who wouldn't (detractors).

CAMHS – child and adolescent mental health services - mental health services for children and young people up to the age of 18.

You can find out lots more about how BCCG work
and how you can get involved in our plans for local healthcare
by visiting our website www.bedfordshireccg.nhs.uk

You can contact us by phone 01525 864430 ext. 5948

Follow us on twitter @BCCG5

Email us at enquiries@bedfordshireccg.nhs.uk

Write to us at
Bedfordshire Clinical Commissioning Group
Capability House
Wrest Park
Silsoe
Bedfordshire MK45 4HR

Or use the Blue iNform button on the home page of our website
to make a comment or ask a question

www.bedfordshireccg.nhs.uk

Meeting: Social Care Health and Housing Overview & Scrutiny Committee
Date: 12 May 2014
Subject: Better Care Fund Plan – Final Submission
Report of: Cllr Mrs Carole Hegley, Executive Member for Social Care and Health and Housing

Summary: The Better Care Fund provides an opportunity to transform local services so that people are provided with better integrated care and support. A final submission was made on 4 April 2014.

Advising Officer: Julie Ogley, Director of Social Care, Health and Housing
Contact Officer: Patricia Coker , Head of Partnerships and Performance, Social Care, Health and Housing

Public/Exempt: Public
Wards Affected: All
Function of: Council

CORPORATE IMPLICATIONS	
Council Priorities:	
<ul style="list-style-type: none"> • Promote health and wellbeing and protecting the vulnerable. 	
Financial:	
2.	<p>The Better Care Fund for Central Bedfordshire is approximately £18 million from 2015/16 onwards. This pooled fund is based on monies already allocated within the health and social care system and includes funding to mitigate the impact of the transformation of adult social care proposed in the Care Bill.</p> <p>The development of the BCF plan has financial implications for both the Council and the Clinical Commissioning Group for the following reasons:</p> <ul style="list-style-type: none"> • Financial and demographic pressures facing councils and the NHS and the requirement to protect services • The combined pooled budget of Adult Social Care and the CCG will require a robust governance framework to manage the pooled funds • Elements of the Care Bill for implementing new and health and social care responsibilities are aligned to the Better Care Fund • The reduction of NHS Acute allocations to support the implementation of the Better Care Fund Plan could impact on Acute Providers if the agreed outcome measures are not delivered.

Legal:

3. Legal implications will be considered as part of delivery of the Better Care Fund Plan.

Risk Management:

4. Risk issues are identified within the Better Care Plan. A shared risk register will be established as part of the Better Care Fund Programme and will include the impact on Acute Services, as emphasised in engagement with acute sector providers, social care delivery and the steps that will be taken if activity volumes do not change as planned for example failure to reduce emergency admissions or increasing use of nursing/residential home admissions.

Staffing (including Trades Unions):

5. Not Applicable.

Equalities/Human Rights:

6. The Better Care Fund Plan for Central Bedfordshire is focussed on improving the health and social care outcomes for older people. The Better Care Plan is based on the Joint Strategic Needs Assessment and reflects the priorities set out in the Joint Health and Wellbeing Strategy, commissioning plans and strategies, which have been or will be subject to the appropriate equalities impact assessments and take account of the protective characteristics of the Equality Act 2010

Public Health

7. The Better Care Fund Plan is focused on improving health and social care outcomes for older people, with an emphasis on promoting health and wellbeing through prevention and early intervention.

Community Safety:

8. Not Applicable.

Sustainability:

9. Not Applicable.

Procurement:

10. Not applicable.

RECOMMENDATION(S):

The Committee is asked to:-

1. **Note the Better Care Fund Plan for Central Bedfordshire and the wider implications for the health and social care economy in Central Bedfordshire and for the Council as a whole.**
2. **Receive an update following submission of the Plan**

Background

1. The Better Care Fund (BCF - previously referred to as the Integration Transformation Fund) was announced in June as part of the 2013 Spending Round, to ensure transformation in integrated health and social care.
2. The Fund provides for £3.8 billion worth of funding in 2015/16 to be spent on health and care to drive closer integration and improve outcomes for patients and service users and carers. It is intended to provide a better experience of care to patients and service users and by so doing reduce the pressure on residential care and acute hospitals.
3. The Better Care Fund for Central Bedfordshire is approximately £18 million from 2015/16 onwards. This pooled fund is based on monies already allocated within the health and social care system and includes funding to mitigate the impact of the transformation of adult social care proposed in the Care Bill. It also represents a 2 year element of the Clinical Commissioning Group's five year strategic Plan for Patients.
4. The final submission reflected feedback on the initial submission made as part of the assurance process from NHS England. Appendix 1
Further changes were also made as a result of the revised template for Part 2 which incorporates financial and performance elements of the Plan (although these changes are relatively minor and, specifically, split out recurrent and non-recurrent spending and benefits). Appendix 2
5. The key programmes set out in the initial submission remained largely unchanged. There was further engagement with Acute Sector Providers to understand the consequential impact of the proposed changes and how these might be addressed. We have also engaged heavily with the localities in this process and for the programme we need to construct to deliver on our ambitions.
6. There is further emphasis on mental wellbeing in the final version of the plan and this is reinforced in the prevention and early intervention programme. The need for access to high quality mental health services and a closer alignment of physical and mental health particularly in the acute sector is articulated in the document.

The Better Care Fund Plan

7. The Better Care Fund Plan for Central Bedfordshire sets out a shared vision for health and social care in Central Bedfordshire, rooted in a locality-based delivery model. It describes the agreed strategic approach based on four priority programmes for delivering integrated care at scale and pace, and therefore achieving the key outcomes expected by the Health and Wellbeing Board and the people of Central Bedfordshire.

8. In setting out the four priority programmes below, we recognise the importance of shifting resources from hospital settings to more community-focussed care to deliver improved health and care experiences as well as more effective use of resources:
 1. **Reshaping the model for prevention and early intervention** – through an integrated approach to primary, secondary, and tertiary prevention to stop or reduce deterioration in health. This will ensure the most progressive, evidence-based prevention and early intervention programme are available to our population.
 2. **Supporting people with long term conditions through multi-disciplinary working** – focussing services around general practice in locality networks and helping people to manage their own conditions in the community. This will ensure robust and consistent arrangements are in place across Central Bedfordshire to both identify and organise effective support to those with long term conditions, particularly those with complex co-morbidities. This will include access to multi-disciplinary support and packages of care organised to maximise independence.
 3. **Expanding the range of services that support older people with frailty and disabilities** – developing and integrating the range of housing, new technologies, mobility, and support for carers. This will ensure availability of services that wrap around older people with specific conditions and issues to maintain their independence and remain in their own homes and in their communities for as long as it is safe to do so.
 4. **Restructuring integrated care pathways for those with urgent care needs** – ensuring that these are seamless, clear, and efficient to help deliver the clinical shift required to move care away from acute settings, where appropriate.
9. The Central Bedfordshire Better Care Fund Plan provides the opportunity to transform local services so that people are provided with better integrated care and support and is seen as an important enabler to take the integration agenda forward at scale and pace. It supports the aim of providing people with the “right care, in the right place, at the right time” through a significant expansion of care in community settings. It builds on the work already underway including the Community Bed Review, Joint Health and Wellbeing Strategy, Integrated Care Pioneer Bid, South Bedfordshire Demonstrator Project and investment in Prevention Services. It is intended that this approach can be applied across all customer groups including children and young people.
10. More comprehensive description of planned changes and key success factors are set out from page 15 of the Submission.

Summary of changes from the February Submission:

- 11 We received very positive feedback on our initial submission from NHS England and only small amendments were requested by them. This means that we have been able to focus more on establishing the approach we want to take to deliver on the programmes included in the plan.

Key changes made following feedback from the NHSE Local Area Team and Local Government Association from the 14 February submission and further local engagement activities are as follows:

- Alignment of the Better Care Fund Plan with the Mental Health strategy and emphasis on mental wellbeing and need for access to high quality mental health services and a seamless approach to physical and mental health particularly within the acute sector
 - Reflecting the consequential impact of the proposed changes on the acute sector and how these might be addressed
 - Demonstrating the Care Bill element of the Better Care Fund Plan
 - Reflected feedback from Healthwatch and locality groups in relation to dementia and end of life care.
 - Further revision to the Risk register
12. The tenet for delivery of the Better Care Fund Plan in Central Bedfordshire is locality approaches and delivery of care through a number of Hubs based around the four Localities. These would be multidisciplinary hubs, operating seven days per week, providing a range of medical, nursing and social care interventions to support their local population and would prevent people, especially frail older people, making unnecessary journeys to hospitals.
- 13 The Better Care Fund Plan ambition for integrated locality based delivery of health and care services is importantly linked to the on going review of local health services in Bedfordshire and Milton Keynes. This link is also referenced in the Better Care Fund Plan submission.
14. Further detailed work is required to fully develop the programmes for each of the four localities in Central Bedfordshire including:
- Moving forward coherently with full sight of the risks and budget changes required to deliver the locality model.
 - Defining further locality specific based activities
 - Understanding the commissioning implications and the fundamental changes required in procuring and delivering services.

Key elements of this work includes data modelling to understand patient flows, further clarifying the savings, workforce capacity issues and implications for information and data sharing. An Officer Delivery Group has been established to support the Better Care fund programme and further guidance is being sought from senior officers about how we deliver the Better Care Fund programme.

15. A Chief Officer Group comprising officers within the Council, Clinical Commissioning Group and Locality Leads will be convened to lead on commissioning for integrated care and will oversee financial and performance management. Progress in implementing the Better Care Fund Plan will be monitored through outcomes reporting to the Health and Wellbeing Board.

Transfer of funds

16. The Better Care Fund will be governed by a Section 75 agreement which will be finalised within the coming months and will be brought back to a future meeting of the Health and Wellbeing Board
17. There is an existing section 256 agreement to transfer funds from health to social care to support the delivery of social care objectives, approved by the Health and Wellbeing Board in November 2013. The value of this transfer was £3.099m 2013-14 and was targeted towards preventative services including Reablement. The value of this transfer will increase in 2014-15 to £3.821m, an increase of £0.722m over the NHS Transfer funding for 2013/14.
18. The national allocation of £3.8bn for 2015/16 will lead to an apportionment of £15.144m to Central Bedfordshire taking account of the other funding streams set out above. The amount includes £1.19m for Disabled Facility Grants and Social Care capital grants with £14.1m transferring from the Bedfordshire Clinical Commissioning Group. The Clinical Commissioning Group has agreed to top up the adjustment to reflect the initial sum of £15.290m.

Conclusion and Next Steps

19. The Better Care Fund Plan represents a real opportunity to deliver integrated and locality based services at pace. Although there are important challenges for delivering change within the context of a rapidly growing and ageing population, located in a predominantly rural area across seven non-catchment acute hospitals, getting our delivery model for integrated care right and delivered within the next 2 years is crucial to our ability to manage this demand.
20. A shared vision for improving outcomes and health and care experience for older people is evolving across the health and care economy in Central Bedfordshire. This shared vision will be key to delivering the Better Care Fund Plan whilst other fundamental changes, such as the review of local health services across Bedfordshire and Milton Keynes and the re-commissioning of community health and mental health services is on-going.
21. A strong governance framework is being implemented to ensure the commitments made in the Better Care Fund Plan are delivered.
22. Engagement with Acute Providers and other key stakeholders will continue throughout the process of implementation

Background Papers: (open to public inspection)

Better Care Fund Part 2 Final Submission
CBC Better Care Fund Plan Final Submission

Location of papers: Priory House, Chicksands

Meeting: Social Care, Health and Housing Overview and Scrutiny Committee
Date: 12th May 2014
Subject: Housing Allocations Policy
Report of: Cllr Carole Hegley, Executive Member for Social Care, Health and Housing

Summary: The report proposes that the Council adopt the proposed Housing Allocations Policy to ensure that social housing in Central Bedfordshire is allocated on a fair and transparent basis.

Advising Officer: Julie Ogley, Director of Social Care, Health and Housing
Contact Officer: Tony Keaveney – Assistant Director Housing Services
Public/Exempt: Public
Wards Affected: All
Function of: Council

CORPORATE IMPLICATIONS

Council Priorities:

The Housing Allocations Policy supports the following Council priorities :

- Enhancing Central Bedfordshire – creating jobs, managing growth, protecting our countryside and enabling businesses to grow.
- Promote health and wellbeing and protecting the vulnerable.
- Value for money – freezing council tax.

Financial:

1. The cost of implementing the changes proposed by the Housing Allocations Policy are incorporated within the approved revenue budget.
2. It is anticipated that a restricted register and an online application process will provide greater value for money, enabling resources to be moved from processing applications to assisting people into successful and sustainable tenancies. There are General Fund efficiency savings which have been identified within the Council's efficiency programme.

Legal:

3. The Council has a statutory duty to have a Housing Allocations Policy and to ensure that social housing is allocated in accordance with this policy.

4. Historically, the allocation of social housing is an area of service provision which is contested, where there is significant case law to which officers and policy makers must have regard. The Localism Act has essentially created new freedoms for local authorities, enabling local authorities to determine the basis on which to allocate social housing in a way that is much less prescribed in legal terms, than has been previously. Currently, the new freedoms are untested in law.

There is a statutory Code of Guidance, to which officers have had close regard in developing the Housing Allocations Policy. Also, legal advice has been obtained, to consider the Policy from the perspective of changes introduced by the Localism Act 2011 to the Housing Act 1996 and under the Equality Act 2010. The Allocations Policy is being drafted to comply with relevant legislation. The main legal implications relate to the equalities implications and these are considered within this report, including the mitigations and actions necessary to ensure the Council is fulfilling its Duty to promote Equality.

5. There is risk of legal challenge in all areas of service provision and in particular in those areas where the resource is scarce and priority is being determined between competing needs. The Allocations Policy has been developed with mitigations to reduce the risk of legal challenge, whilst also exploiting to the fullest extent, the new freedoms afforded by the Localism Act. For example, the proposal to prioritise working people over non working people is an area that could legally be challenged. Yet a main aim of the Policy is to incentivise employment.

Risk Management:

6. The Housing Allocations Policy helps to mitigate the following risks:
- Failure to deliver the Council's priorities, Medium Term Plan, and the Housing Strategy 2011-15
 - Failure to make adequate provision for the accommodation needs of older people in Central Bedfordshire.

Staffing (including Trades Unions):

7. Not Applicable

Equalities/Human Rights:

8. Public authorities have a statutory duty to promote equality of opportunity, eliminate unlawful discrimination, harassment and victimisation and foster good relations in respect of nine protected characteristics; age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. National and local research indicates that there is a shortage of appropriate and affordable housing for older people. The approval of the Allocations Policy will play an important role in helping to improve outcomes for CBC tenants and members of the community in housing need. The policy includes a number of positive provisions for vulnerable groups.

9. A full Equalities Impact Assessment has been completed and is provided at Appendix 3. The assessment has highlighted some potential adverse impacts relating to the employment and residency criteria. These issues are considered in further detail in the main body of the report along with some proposed mitigating actions.
10. The policy will be closely monitored during the early stages of implementation to check that the process is operating as fairly as possible, and that no individuals are being indirectly discriminated against. Consideration has been given to the legal implications of the key issues identified through the EIA .

Public Health

11. Good housing has a positive impact on public health and education.

Community Safety:

12. The Allocations Policy proposes that individuals who would make unsuitable tenants based on former evidenced behaviour are not eligible to join the Housing Register, which will enhance the safety, security and well being of the community.

Sustainability:

13. The Allocations Policy contributes to creating sustainable communities. In particular, the Housing Allocations Policy seeks to more clearly define the social purpose of the social housing system, locally. Specifically, the Policy aims to incentivise employment to support local communities and also promotes the best use of stock, as a means to ensure that local housing need is being met. The Policy provides a safety net to vulnerable people and introduces new local connection criteria, which should result in more accommodation being available to people currently living in or connected with Central Bedfordshire. Significantly, the Allocations Policy does not include cross border mobility as a main feature of the Allocations Scheme, which is a significant break with the scheme that was introduced in 2009. The changes proposed, when taken all together, will contribute significantly towards the sustainability of local communities.

Procurement:

14. Not applicable.

RECOMMENDATION(S):

Committee is asked to:

1. **Consider the feedback received as a result of the public consultation on the draft Housing Allocations Policy, having regard to the key aims of the proposed Housing Allocations Policy.**
2. **Consider the Housing Allocations Policy (appendix 1), with particular regard to the Council's duty to promote Equality and provide comment to the Executive.**

BACKGROUND

15. The Council has embarked upon an ambitious programme of housing reform, driven largely through the opportunities presented by the Localism Act 2011. Following Member seminars held in August 2012, June 2013 and subsequently, the work of a member Task and Finish group, a local Housing Green paper was developed, setting out the direction of travel and broad aims. The local Green paper's vision for Housing in Central Bedfordshire includes: Social mobility will be supported with a range of products which will open up home ownership and 'affordable' renting to a greater number of households, helping people onto the 'housing ladder'.

The local housing market will offer a good choice of locations, property and tenure types to older people.

- Well-managed, good quality social housing will be used to provide a strong safety net to those who are vulnerable.
 - Social housing will be allocated fairly, and used to support people's working lives.
 - Social landlords will support their tenants to make the most of their tenancy as a springboard into work and financial stability.
16. The Localism Act 2011 introduced changes in legislation which gives Local Housing Authorities greater freedom and flexibility in determining who can apply for social housing. The Housing Allocations Policy governs who can apply to join the housing register, the size of the property for which a person can apply and the priority given to housing applications. The Council has a statutory duty to ensure that social housing is allocated in accordance with the Council's Allocations Policy. The allocation of social housing is administered through a Choice Based Lettings Scheme.
17. The development of a new fit for purpose Allocations Policy is a key step within the scope of the local Housing Green paper. The proposals that have emerged have fully exploited the new freedoms associated with the Localism Act. The Housing Allocations Policy prescribes how a resource (circa 1000 social lettings per annum) should be used. The policy determines who should benefit from those lettings. Therefore, the Housing Allocations Policy is defining of the "social purpose" of the local social housing resource. The Housing Service undertook an evidence based review of the current Policy, which resulted in a number of significant proposals. The following data influenced the development of the new policy
- During the year years 2011-14, there were circa 2,956 social lettings in Central Bedfordshire, consistently around 1000 lettings per annum. This is a relatively good supply of accommodation and the average waiting time, for those households who are re-housed is typically 35 to 40 weeks. The local system is not under stress.
 - In early 2013, at least 20% of CBC's general needs housing stock was under occupied by one bedroom or more. This has been reducing due mainly to welfare reform and moves/transfers that the Council has enabled. However, the indication is a resource that is not being fully utilised.
 - There are around 3000 households on the housing register, but a relatively small proportion are actively bidding for available properties. Inevitably, 'bidding activity' is related to what properties are available locally
 - 70% of new social housing tenants in the CBC area are not in work or economically active. The figure is noticeably higher in the south of Central

Bedfordshire, than the north.

- On average 49 new applications for Housing are received each week, but only a relatively small proportion of these applicants are in 'housing need' or likely to be re-housed
- Across Central Bedfordshire, it is estimated that at least 1500 older persons households living in social housing are under occupying their home
- 18. The Localism Act gives Councils the freedom to not register applications from households who have no housing need. The new policy proposes that applicants who do not fall into one of the reasonable preference groups (that essentially define what constitutes "housing need") are not registered for rehousing. The reasons for this approach are:
 - Registering applicants with no housing need raises expectations
 - Applicants on the housing register continue to make contact with the council, even though they are told to explore other housing options. This increases the workload of the service
 - There is an on-going cost to managing the housing register in terms of customer contact and re-registration. By removing those households who are not in housing need, the cost of managing the Register will be reduced. This has been factored into planned efficiency savings.

18. In making this change, the Council is able to focus on using the supply of social housing in meeting the needs of people to whom the Council has a statutory responsibility and is required to give reasonable preference. Cross border mobility was a main feature of the Allocations Scheme introduced in 2009, in an approach developed jointly with Luton Borough and Bedford Borough Councils. In developing the new Policy, consideration was given to whether that feature of the existing scheme had benefited Central Bedfordshire residents and achieved its policy aim, which was to promote social mobility. The review of the Policy demonstrated there was no discernible benefit and for this reason, it is not proposed to include cross border mobility as a main feature of the Allocations Policy. Instead, specific criteria have been introduced to strengthen the requirement for a local connection to Central Bedfordshire, so as to make best use of the social housing resource, to benefit residents of Central Bedfordshire who are in housing need.

WHOLE SYSTEM CHANGE

19. Central Bedfordshire is an area of significant housing need. Currently, there are circa 3,300 households on the register. Of these, approximately 45% of households registered have no housing need (because they are currently living in suitable accommodation), although clearly they have a wish to move.

Those registered as being in high/urgent housing need is typically around 6% of the Housing Register, currently 198 households. The remaining 49% of registered households are in housing need, to varying extent, including low, medium and relatively high needs. While those in the higher bands have a reasonable chance of being housed, many of those in the lower bands are unlikely to be ever be re-housed.

The effective operation of the social housing system locally is a key consideration, for the Council and Housing Association partners. The proposed changes will introduce essentially a hybrid system that plays to the strengths of a Choice Based Lettings (CBL) system and also the benefits of direct intervention (i.e. Transfers and direct lets). Currently, the local system is strongly weighted to being solely a CBL scheme, which has advantages around transparency and customer access. But

CBL is disadvantaged in that “only one need is met” (by a let), whereas transfers can create “chains of moves”, thereby meeting multiple needs. The evolution of the Allocations Scheme will take time, to be guided by an Annual Lettings Plan (ALP). This is described at page 7 and 49 of the Housing Allocations Policy.

- i. 20. The Annual Lettings Plan will be used to determine how the predictable resource of lettings (approximately 1000 per annum) will be used. The purpose of the ALP is to “make best use of stock”. It is envisaged that approximately 2/3rds of lets will continue to be let through CBL, whilst about 1/3rd of lets will be used on the basis of direct lets, transfers and quota. During 2013/14, the use of direct lettings have been an important approach that has enabled the Housing Service to respond effectively to welfare reform, by enabling households to move to accommodation they are able to afford. The ALP will stipulate quota to be used to meet specified needs, for example children leaving care, or mental health needs, or to support Foster Carers.

AIMS OF THE POLICY

21. The draft Allocations Policy aims to be simple, transparent and fair in its application, and to make the best use of social housing provision. The key objectives of the draft Allocations Policy are to:
 - I. Help applicants in housing need to find suitable housing.
 - II. Provide housing applicants in Central Bedfordshire with a fair and transparent system.
 - III. Provide an incentive for applicants to seek employment.
 - IV. Create a simpler system – by reducing the number of bands used to distinguish or differentiate need. Date order of application will determine the priority of those households in housing need, except for those with an urgent need to move.
 - V. Make efficient and best use of social housing stock in the area.
 - VI. Encourage applicants to take a measured and long-term view on housing options and to take responsibility for planning their own housing provision.
 - VII. Supporting older people to live close to established networks
22. More specifically the policy seeks to achieve the following outcomes:
 - Encouraging applicants who are out of work to seek employment.
 - Balancing reasonable preference with local priorities.
 - Providing support for low paid workers in the private sector.
 - Practical help for those threatened with homelessness.
 - Supporting households who work locally.
 - Offering choice.
23. In strategic terms, the rationale for change is to ensure that the available resource (circa 100 lets pa) does have a social purpose, within a social housing system and that best use is made of that resource. More fundamentally (as far as can be achieved), that customers do benefit from the provision of a home at relatively low cost to improve their life chances, mainly through help to access to employment.
24. The Localism Act 2011 introduced new freedoms and flexibilities in a number of areas including the allocation of social housing. A new statutory code of guidance has also been issued. Councils can now choose to restrict the waiting list for social housing if they so wish and can define local priorities for social housing as long as ‘reasonable preference’ is given to those set out in the new section 166A of the Housing Act 1996 as inserted by the Localism Act 2011. These are:
 - Applicants who are homeless including those who are intentionally homeless and

- not in priority need
 - Applicants occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
 - Applicants who need to move on medical or welfare grounds, including grounds relating to disability
 - Applicants who need to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others).
25. The Localism Act gives the freedom to not register applications from households who have no housing need. The new policy proposes that applicants who do not fall into one of the reasonable preference groups are not registered for rehousing. Currently, this would be circa 1500 households. The reasons for this approach are:
- Applicants with no housing need stand very little chance of being re-housed and to register them on the list creates a false expectation of social housing being available to them.
 - Social housing is a scarce resource and should only be available to those in housing need.
 - Restricting access to the list provides clarity of the role of social housing within Central Bedfordshire; it changes the expectation that social housing is available to those without a housing need and at the same time protects the most vulnerable in the borough.
 - There is a significant workload in managing and administering a waiting list; reducing the size of the list to include only those most in need of housing, would reduce costs and enable resources to be targeted to provide assistance to those not in housing need to secure an alternative housing solution.
26. In taking the approach outlined above, the Council is able to focus on using the supply of social housing in meeting the needs of people to whom the Council is required to give reasonable preference, alongside meeting local priorities.
27. There are a number of significant changes within the draft Allocations Policy in relation to who qualifies to join the housing register, priority given within the register and a reduction in the number of bands. These key changes are summarised below.
1. People with no housing need will no longer be eligible to join the housing register.
 2. People without a local connection will no longer be eligible to join the housing register. A local connection is defined as having lived continuously in Central Bedfordshire for three years, or being employed in Central Bedfordshire for six months.
 3. People with an income sufficient to buy their own home or rent a home privately will no longer be eligible to join the housing register.
 4. People with assets over £23,250 will no longer be eligible to join the housing register.
 5. The banding system will comprise of two bands: one for very urgent housing needs, and one for all other applicants. This is a reduction from the current position of four bands.
 6. Working households are prioritised for properties over non-working households.
 7. People who are considered to be unsuitable tenants are not eligible to join the housing register. Unsuitable tenants may include people who have a

- poor tenancy history, those who have rent arrears, and those who have been violent, abusive or threatening in their behaviour.
8. Low paid workers living in privately rented accommodation will be considered to be in housing need and eligible to join the housing register.
 9. Introduction of an Older Person's Housing Register for applicants over the age of 50.
 10. Older people living in close proximity to a property being advertised, that is designated as being for the use of older people, will have priority for the property over a person who has the same level of need. The proposal is that this feature should apply within 2 miles of an advertised property.
 11. Introduction of quotas for certain needs groups these will be determined as part of the Annual Lettings Plan.

OPERATIONAL CHANGES

- 28 The Housing Service intends to introduce online housing applications (to the Housing Register) and will no longer process paper based application forms. The critical tool for this will be a self assessment tool that will assess a home seekers eligibility for inclusion on the register based on information submitted by the customer.
- 29 In accordance with recent indirect discrimination case law relating to on-line submissions, vulnerable applicants will be assisted to complete this assessment. If a home seeker does not attract reasonable preference, he or she will be diverted via the self assessment tool to an interactive housing options calculator which will identify the most realistic and suitable housing option for that household based on real time information provided by the customer.
- 30 In developing an approach to on line self assessment and on line registration package, the Housing Service will introduce a means to capture information about where households prefer to live and what type of properties they want to live in. This information will be used to plan for the development of new affordable housing in locations where people want to and can afford to live.
- 31 It is intended that the changes introduced by this Policy will use Council resources more effectively and efficiently, by moving staff resources from processing to meaningfully helping customers into successful and sustainable tenancies. This efficiency saving is established within the Council's efficiency programme, now being reflected in a comprehensive restructure of the Housing Service, that has created a Housing Solutions team, as an amalgamated Housing Needs/Private Sector service.

CONSULTATION

- 32 Extensive consultation was undertaken in the development of the proposed Allocations Policy, with applicants, tenants, stakeholders and staff. A number of workshops were held, which included a stakeholder workshop; a series of staff focus groups; and face-to-face consultation with people living in temporary accommodation, and attendees of job clubs. Alongside this a detailed written consultation exercise was undertaken.
- 33 The formal consultation was managed via a formal consultation document. This document was available in paper format: downloadable from the Council's website, and obtainable by telephoning or writing to the Council. This process was managed by the Customer Engagement and Partnerships team.
- 34 Households currently in bands C and D on the existing Housing Register; who are

likely to be impacted by the proposed changes; were written to as part of the consultation. They were notified of the proposed changes and invited to respond to the consultation.

35 Alongside applicants, Stakeholders, Partners, Central Bedfordshire Council employees and Elected Members were informed of the consultation. Awareness of the consultation was raised through the use of social media and press releases.

36 In response to the written consultation 102 individuals responded, this equates to a return rate of 6.8%. Of these respondents; 25% were housing register applicants; 16% were Housing Association tenants; 6% were from Town or Parish Councils; 10% were professionals; 16% were recorded as other and 17% did not include this information. 29% of respondents were male and 67% female, 45% were aged over 55 years and 19% stated that they had a disability.

37 The key findings from the written consultation are summarised below, the full response to the Consultation can be found in appendix 2.

I. Housing Needs

57% of respondents agreed that people with no housing need should be stopped from joining the housing register. Those that did not agree (39%) cited issues in relation to affordability and that the draft policy fails to consider all circumstances.

II. Local Connection

67% of respondents agreed with the proposal that only people who had lived continuously in Central Bedfordshire for three years should be allowed to join the register, whilst 30% were opposed to the proposal. Feedback included that three years was too long a period and that individual circumstances should be considered including reasons such as fleeing domestic abuse and moving closer to an elderly relative.

60% of respondents who agreed with the local connection proposal felt that three years was the right period of time in which to establish a local connection. Of the respondents who did not agree with the three-year proposal, half of them felt that five years was a more appropriate length of time.

67% of respondents agreed with the proposal that a Local Connection could be established by having been employed in Central Bedfordshire for six months.

III. Affordability

70% of respondents agreed with the proposal that people with sufficient income to buy their own home or to rent privately should not be able to join the register. Of those 75% considered the income thresholds to be fair.

59% of respondents agreed with the proposal that households with savings or assets over £23,250 should not be able to join the register.

IV. Banding

61% of respondents agreed with the proposal to move to two bands: one for very urgent housing need cases; and one for all other applicants. For those that did not agree concern was expressed that this system may be too restrictive,

and that the second band would be a very large group with varying levels of housing need.

V. Employment Priority

66% of respondents agreed with the proposal that working households are prioritised over non-working households. Concern from individuals who did not support this proposal included the difficulty in accessing employment in the current economic climate.

VI. Unsuitable Tenants

80% of respondents agreed with the proposal to exclude unsuitable tenants from the housing register. Of those that did not agree with this proposal concerns were raised about where excluded people would go.

VII. Low Paid Workers

85% of respondents agreed with the proposal that low paid workers living in privately rented accommodation should be allowed to join the register.

VIII. Older Persons Accommodation

12% of respondents agreed that older people with no demonstrable housing need should be able to bid for vacant older people's accommodation where these properties attract no interest/bids. 85% of respondents did not answer this question.

38. Consultation feedback from the workshops and focus groups included:
- Support for restricting the Housing Register to those households in housing need.
 - Overall support for a simplified banding system.
 - Overall support for the quota system.
 - Concern about the ability to allocate social housing stock if the register is restricted.
 - Concern that debt that has arisen due to bedroom subsidy would be held against applicants.
 - Concern regarding the lack of employment opportunities and support to access work.
 - Concern about the ability to access an online only system for vulnerable households.
39. The views of each specific group are detailed below:
- I. Stakeholder Workshop, including Registered Providers. Support for the Policy was expressed especially in relation to the aims around employment, and resources and a simpler more transparent system. Concern was raised in relation to online access.
 - II. Child Poverty Group held on 10th September 2013. Support for the principles of the policy were expressed, with some concern articulated in relation to barriers in accessing employment and addressing debt.
 - III. STAG Tenant Engagement Group held on 28th August 2013, attended by 24 residents. Support for the exclusion section and income section was given, but some concern expressed in relation to employment opportunities.
 - IV. Way Forward Panel attended by 5 members and Council Employees.

Suggested including voluntary work within the employment section and expressed support for excluding bad behaviour and the priority given to ex-service personnel.

- V. Focus group with Bedford Court Residents attended by 8 residents. A range of views were expressed, with overall support for the new Policy.
 - VI. Face to face consultation with attendees at job clubs
 - VII. Series of workshops with Housing Service staff
40. In light of the consultation responses, the Council has drafted a proposed Housing Allocations policy which fully exploits the new freedoms of the Localism Act, yet also responds to the feedback received from consultation. Whilst there are no fundamental changes to the proposed Policy as a result of consultation, the contribution from local residents and stakeholders has been valuable.

There are many comments that will directly inform the implementation plan and be incorporated within Operating Procedures. In addition, many of the comments have helped to resolved potential problems, or have influenced the Policy in many, many small ways, all of them helpful to ensure that the Policy, when implemented in the autumn of 2014, achieves its key aims. In particular, the comments received will inform the Communications Plan being developed and should ensure that the changes to customer pathway, as well the significant changes that are likely in terms of customer expectation, can be managed effectively. The Policy does introduce significant changes, which should not be under-estimated in terms of –

- The Policy itself, e.g. prioritising people in work over those who are not working
- On line assessment/registration, with support in place for vulnerable people
- Moving to a hybrid system, that combines both Choice Based Lettings approach and a significant proportion of direct lettings, through an Annual Lettings Plan
- Significant changes to the customer pathway and changes also, in terms of customer expectations

EQUALITIES IMPLICATIONS

41. A full Equality Analysis has been carried out for this policy, and can be found in appendix 3. The draft policy includes a number of positive provisions for vulnerable groups for example in relation to disability, domestic violence, carers, looked after children, foster carers, helping people escape the bedroom tax, helping low paid workers who may have families and be living in poverty.
42. The Council may choose to make a percentage of annual lets available to certain groups of applicants, via quota schemes. Where this is the case, these will be set out in an Annual Lettings Plan. Groups likely to be subject to a quota include:
- Clients with mental health issues, but ready to move on from supported housing schemes
 - Clients with learning disabilities, but ready to move on from supported housing schemes
 - Others to be identified as part of consultation with partner agencies

Employment

43. The EIA has highlighted a number of issues in relation to employment. Encouraging housing applicants that are out of work, to seek work is a key aim of the Allocations Scheme.
44. To facilitate this, applicants who are working will be given priority for vacancies above applicants who are not working. Applicants who are not in work, will be given advice and practical assistance in finding work from the housing options team and by other key agencies in order to give them better prospects of re-housing via the Housing Register.
45. The findings of the Hills Review have highlighted that the employment rates of those living in social housing with particular disadvantages or with multiple disadvantages are substantially lower than those of people with similar disadvantages but living in other tenures. The Hills Review also highlighted evidence that current allocations policies can create concentrations of poverty, which can have a detrimental impact on both community cohesion and sustainability; as such it is a legitimate aim of the Council to provide an incentive for applicants to seek employment.
46. Recognising the barriers that people, such as disabled people, single parents and families with young children, and some people from black and minority ethnic (BME) communities can experience in finding work, the Council's Economic Growth, Skills and Regeneration Team has oversight of a variety of initiatives designed to help people find employment. These initiatives are set out in the All Age Skills Strategy. The Child Poverty Strategy also includes initiatives designed to help people access employment. Housing officers could have a key role to play in helping residents access these opportunities.
47. Legal advice received is that in addition to assessing the effect on persons with protected characteristics, the Council should also record successes of the various access to employment schemes with regard to person's with protected characteristics.
48. The introduction of the employment incentive does not mean that non working people will be unable to access housing. It is estimated that the impact will be that average wait times (for those people in housing need, likely to be re-housed) might increase from 40 weeks, for non working people – to a maximum of 60 weeks, whilst employed people are likely to average a wait of 20-25 weeks. However, this is difficult to predict because no one really knows how people will behave in relation to the new Policy – i.e. how they will bid for available properties. It is foreseeable that working people will, in the main, choose to pick the better properties, in preferred locations. Any number of scenarios can be speculated upon, the important point being to monitor the impact of the Policy, having regard to evidence.
49. The EIA recommends that further consideration is given to the provisions which may have an adverse impact on groups of people that find it much harder to access employment, as this could potentially amount to indirect discrimination. As a result of the EIA the policy extends the employment priority to people who are undertaking training or volunteering. Disabled applicants under retirement age who have been assessed as eligible for Support Element of the Employment Support Allowance due to their permanent disability which prevents them from participating in work related activities, will receive the employment priority.

Local Connection

- 50 Consideration has also been given to the impact of the local connection criteria and whether residency requirements have the potential to indirectly discriminate against BME Groups. The Council's proposed policy defines a person having a "Local Connection" if they must have lived continuously in the Central Bedfordshire area for 3 years at the time of registration and need to remain resident in the area to preserve that registration, or be in contracted employment in the area and have been for a period of at least 6 years. The policy lists exceptions to this. The Code of Guidance recommends that a local connection is established after a minimum period of two years residency. Legal advice received is that there is a risk that the exceptions provided in the policy do not go far enough and that a court might rule that the requirement will have a discriminatory effect
- 51 77% of existing applicants for social housing are White British compared to 89.7 % of the Central Bedfordshire population. This indicates that BME groups currently have good access to the housing register. It is not currently known how this ratio may change under the revised policy but respondents to the consultation have not indicated a concern that BME groups will be unfairly excluded.
- 52 The qualifying criteria that is being proposed relates to three years residency or six months employment. There are also a number of exceptions to the residency criteria. The Council has been advised to include a further exception to cover and extend to persons able to demonstrate strong connection to CBC's area by reference to strong family association – whether by residence or employment and to also include a special circumstances exception which could be referred to the Housing Needs panel for consideration and decision.
- 53 The policy will be closely monitored during the early stages of operation to ensure that the process is operating as fairly as possible, and that no individuals are being indirectly discriminated against. Full legal advice in relation to the equalities issues identified above is available on request.

IMPLEMENTATION

54. The new policy is anticipated to be operational during the Autumn 2014 and there are several issues that are to be resolved, to ensure a successful implementation. A detailed implementation plan (including Communication Plan) will be agreed by partners following adoption of the Policy. An Allocations Policy Implementation group has been established, consisting of representatives from Aragon Housing Association and Housing Service staff. Throughout the development of this Policy this group has worked to identify implementation issues and mitigations. The consultation process has identified many potential issues, which are being resolved. The challenge will be to implement significant change in Policy, concurrent with technological change and changes to the customer pathway and expectations. It is likely that the implementation of change will be a phased, incremental approach.
55. There will also be an internal Procedure Guide, which will be agreed by all the partners and will guide officers in the operation of the Policy.
56. An initial review of the impact of the new Policy should take place 6 months after it becomes fully operational and the Social Care, Health and Housing Scrutiny and Overview Committee will be informed of the outcome of this review.

PARTICULAR AREAS FOR THE COMMITTEE TO CONSIDER

57. There are a number of particular areas of debate which Overview and Scrutiny are asked to reflect on, in order to make recommendations to Executive.
58. The draft Allocations Policy proposes to reduce the Housing Register to two bands, and to restrict the Housing Register to applicants who are in housing need. Applicants with no housing need will not be able to join the Housing Register. The rationale for this approach is detailed in paragraph 25. Households in no housing need will, however, be able to bid for hard to let properties advertised on the 'Available Now' page. The Allocations Policy working group felt that this approach targeted the scarce resource of social housing to those in housing need, whilst at the same time ensuring that the risk of long term void properties was minimised. The Committee are asked to consider this approach.
59. In order to ensure that local homes are available to local people the draft Allocations Policy proposes to only enable households with a local connection to Central Bedfordshire to join the Housing Register. A local connection is defined as having lived continuously in Central Bedfordshire for three years, or being employed in Central Bedfordshire for six months. The outcome of the consultation, whilst in support of this principle, highlighted a range of views as to whether these timescales were too long or short. Having sought a legal opinion, the Council has been advised to include a further exception to cover and extend to persons able to demonstrate a strong connection to the Central Bedfordshire area by reference to strong family association. The Committee is asked to consider these timescales and whether they are of an appropriate length in which to establish a local connection.
60. Encouraging housing applicants that are out of work, to seek work is a key aim of the proposed Policy. To facilitate this, applicants who are working will be given priority for vacancies above applicants who are not working. Applicants who are not in work, will be given advice and practical assistance in finding work from the housing options team and by other key agencies in order to give them better prospects of re-housing via the Housing Register
61. In the National Housing Strategy published in Autumn 2011, the government recommended local authorities to consider giving additional priority for social housing to working households. The Policy aims to support working households and to support wider corporate priorities in terms of the growth of the economy and sustaining employment. Through the consultation process concern was expressed in relation to the difficulty in accessing employment within the current economic climate. The policy proposes that support is provided to households wishing to seek employment and the Council has been advised to monitor the success rates of this support. The Committee is asked to consider this part of the policy.
62. The Social Care Health and Housing Overview and Scrutiny Committee are asked to consider the points outlined above and to make recommendations to Executive. Specifically, the Committee is asked to consider the feedback received as a result of the public consultation on the draft Housing Allocations Policy, having regard to the key aims of the proposed Housing Allocations Policy and the Council's Duty to promote Equality.

Appendices:

Appendix 1 – Housing Allocations Policy

Appendix 2 – Response received during the public consultation.

Appendix 3 – Equality Impact Assessment

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Social Care, Care and Housing Overview and Scrutiny
12th May 2014

Appendix 1

Central Bedfordshire Council

Housing Allocations Scheme

May 12th 2014

Final draft

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FOREWORD

As the Council's Executive Member for Social Care, Health & Housing, I would like to welcome you to the Council's new Allocations Scheme. Its purpose is to let social and affordable housing in Central Bedfordshire in a fair and transparent way.

Housing has a central role to play in everything we are seeking to achieve in Central Bedfordshire. During 2013, we worked closely with stakeholders and local residents to develop our Housing Green Paper, which sets out the Council's thinking to date on housing issues and challenges and our priorities for action in driving forward with a new agenda. A copy of our local Green Paper can be found at <http://www.centralbedfordshire.gov.uk/home-and-housing/housing/housing-policies-strategies/housing-policies-strategies.aspx>

One of the key concerns for us is making sure we maximize and make best use of the supply of affordable housing stock in Central Bedfordshire, to ensure that it is as affordable as housing finance allows it to be and that it is appropriately targeted at households who are in genuine housing need. We work closely with developers to make sure the type and mix of housing in the area is appropriate.

This Allocations Scheme, like the already published Tenancy Strategy, takes advantage of the opportunities provided by the Localism Act in creating a truly local Allocations Scheme, based on significant research into our local housing needs, a comprehensive evaluation of the evidence on how we are able to meet these and within what time frames. Each year we have between 850 and 1000 lets to make to homes that are provided by social landlords in Central Bedfordshire, including the Council. The average waiting time for a property is in the region of 35 to 40 weeks, for those households in need, who are likely to be re-housed.

We have worked hard to make the scheme simpler, easier to understand and fairer than any Allocations Scheme we have had before, whilst at the same time meeting a number of fundamental objectives. These are set out below:-

Encouraging applicants who are out of work to seek employment

We want to use the Allocations Scheme to encourage housing applicants who are not in work, and can work, to seek it. They will be rewarded with additional priority at the time of short-listing for a property. This is explained in more detail in the policy, but we believe that applicants who seek and obtain work should have increased housing prospects for social housing as a result. The Council is ambitious to deliver new housing in Central Bedfordshire through the Local Development Framework, and is ambitious to work with partners and business to create new jobs.

2,000 jobs have already been achieved as part of an ambitious target to achieve 27,000 new jobs through our strategy for growth. We want to ensure that our Allocations Scheme supports those aims.

This will encourage applicants who are not working, to seek employment as a way of gaining additional priority for housing. The same priority will also be available to people who are in formal volunteering roles, as we believe these are a route into employment, and show commitment from applicants in making a valid contribution to the community. There are exceptions for those people who have retired or are not able to work. These exceptions are also explained in more detail, within this policy.

Balancing reasonable preference with local priorities

We wanted to develop an Allocations Scheme that is based around the statutory reasonable preference groups, but that has scope to take on board particular local priorities. We also want to give additional preference to certain categories of persons from the forces, in line with the Council's legal responsibility and long standing commitment to helping veterans and their families to resolve their housing need, in the context of the Central Bedfordshire Armed Forces Community Covenant.

This has been achieved in the form of setting aside quotas (or a number of properties) each year for those applicants who have a particular need to move and who the Council wishes to support into independent living. These groups include Foster Carers, people with Mental Ill-Health or Learning Disability who are ready to leave supported housing, as well as households who wish to move in order to become foster parents. These are the groups of households that the Council wishes to support in their home seeking. These groups may change from time to time, and will be reviewed annually.

Providing support for low paid workers in the private sector

The Council is keen to provide access to housing to those who may be adequately housed in the private rented sector, but who struggle to make ends meet because of higher rent levels and low wages. We have included these households in our reasonable preference group as we believe low paid workers in the private rented sector would otherwise suffer hardship.

Practical help for those threatened with homelessness

We anticipate that those threatened with homelessness will be assisted into private sector accommodation, with the help of our private sector access scheme. Where we have properties that are advertised in our "Available Now Window", we are likely to offer these homes to those people threatened with homelessness, in order that the Council is able to discharge our legal re-housing duty. These properties are the ones that don't get let in the first bidding cycle.

Supporting households who work locally

Attracting working households to Central Bedfordshire will support our corporate goal of making Central Bedfordshire "a great place to live and work". In the Housing Green Paper we gave a commitment to support people's working lives and our new Allocations Scheme provides us with an opportunity to do this. We are keen to support those seeking work

locally and those who already have a job here who want to move to be nearer to their place of employment. We think this is important in building sustainable communities and to support the efforts of those working to find jobs locally so that they can contribute to the local community.

Supporting older people to live close to established networks

The Council recognises that whilst older people may need to move to alternative and more suitable accommodation as their housing needs change; established community and support networks are very important to this particular age group. Many of our older residents will have lived within the same community for a long time, and have very strong ties. As such, where possible, we wish to support our older residents to remain within their communities by giving them enhanced priority for vacancies that arise within sheltered and older person's designated accommodation in close proximity to their current address.

Offering choice

The Council is still committed to offering choice in housing. Social and affordable homes let using this Allocations Scheme, will continue to be advertised through our choice based lettings website – Homefinder. Our housing applicants are able to choose the type of property they wish to live in (appropriate to their household size); and in which area. We will offer a range of housing products; social rented homes, affordable rented homes and low cost home ownership.

The Council also recognise the benefits of being able to create chains of moves, as a result of direct letting. Also, during 2013/14, the Council has enabled many people to move to accommodation they can afford, where previously the household has under-occupied a property. Direct lets and transfers have been used to manage the impacts of welfare reform, with significant success.

It is the Council's intention, over time, to develop an Allocation Scheme that is effectively a hybrid of a Choice Based Lettings Scheme and Direct lettings/Quota system, on the basis of an Annual Lettings Plan. This will take to evolve. The Annual Lettings Plan will identify any lettings priorities and quota schemes that will sit alongside the published Allocations Scheme. The Annual Lettings Plan will be evidence based and any proposals for further change will be evidence based, having regard to the outcomes being achieved, with our limited supply of social housing.

Our intention is that the Policy framework will provide definitive guidance as to who will have priority for social housing, whilst the Lettings Plan will allow some flexibility as to how we target and make best use of our limited supply, for the number of lettings we anticipate.

We intend to keep this Allocations Scheme under review to ensure that it is delivering the outcomes that we intend. Officers will carry out the first review within 6 months of the introduction of the Scheme, and this will focus on lettings outcomes delivered so far.

We aim to make the best use of a limited, valuable resource – social housing.

Councillor Ms Carole Hegley

Executive member responsible for Social Care, Health and Housing.

1. Introduction

This document describes the criteria that Central Bedfordshire Council uses to prioritise applications for housing in Council homes, homes owned by Aragon Housing Association and homes owned by other housing associations (sometimes called Registered Providers [RP's]) and let through nomination agreements with the Council.

The Council has divided its Housing Register into two main sections, to reflect how lettings will be made. These are:

- General Needs Housing Register
- Older Persons Housing Register

The Allocations Scheme sets out the eligibility criteria for each part of the Housing Register and the criteria used for advertising and letting within these.

The Council is faced with a substantial demand for social housing, and an insufficient supply to meet the demand within Central Bedfordshire.

Encouraging workless housing applicants to seek work is a key aim of this Allocations Scheme. To facilitate this, applicants who are working will be given priority for vacancies above applicants who are not working. Applicants who are not in work, will be given advice and practical assistance in finding work from the council and by other key agencies in order to give them better prospects of re-housing via the Housing Register.

In reading this Allocations Scheme, please have regard to the Council's published Tenancy Strategy and the Local Housing Green Paper. Both are found on the Council's website.

2. Aims and objectives

The Allocations Scheme describes how the Council prioritizes housing applicants to ensure that those with housing need, as described by the legal definition of "Reasonable Preference" are given access to the majority of available social housing lets. This Allocations Scheme sets out in detail who is and who is not eligible to become a member of the Housing Register and how this assessment is made. It sets out how applicants can apply for housing, how they are assessed and what service standards an applicant can expect to receive.

The Council has designed the Allocations Scheme to meet the legal requirements and in particular the requirements set out by Section 167 of the Housing Act 1996. It explains the

procedures and priorities for the letting of Council and Registered Provider (RP) properties in the area.

The key objectives of this Allocations Scheme are to:

- ***Help applicants in housing need to find suitable housing,***
- ***Provide housing applicants in Central Bedfordshire with a fair and transparent system***
- ***Provide an incentive for applicants to seek employment***
- ***To create a simpler system – by reducing the number of bands used to distinguish or differentiate need.***
- ***Make efficient and best use of social housing stock in the area,***
- ***To encourage applicants to take a measured and long term view on housing options and to take responsibility for planning their own housing provision.***
- ***To support older people to remain close to established support networks.***

The Allocations Scheme is supported through the Council's Housing Options approach which informs applicants of their realistic prospects of obtaining social housing and likely time frames, and promotes other housing options such as low cost home ownership and private renting.

The Council recognises that some applicants are vulnerable; or, a member of their household may be vulnerable. Where it is appropriate, the Council will provide appropriate support to enable a person to apply for housing. This can include advice, automatic bidding for available properties; a direct let to a suitable property; or a referral to an appropriate agency to provide support or access to an accommodation based support service. The support that is available will depend on the household's particular needs.

Annual Lettings Plan

This Allocations Scheme is accompanied by a Lettings Plan. The aim of this plan is to ensure the Scheme is working to meet the aims and objectives set out above and is specifically intended to ensure that the Council is making "best use of the social housing resource". The Lettings Plan will be updated regularly and will cover:

- Predicted supply of homes for letting through the Housing Register, for that year
- Identification of new schemes coming on stream for the year. Identification of the (%) percentage of lettings for these schemes that will be set aside for transfer applicants
- Performance against quotas
- The out turn of lettings for the previous year, as an evidence base for revising any quotas that are in place

More detail on the exact content of the Lettings Plan is contained in Appendix 1.

Statement of choice

The Council is fully committed to enabling applicants to play an active role in choosing where, and in what property type and tenure they wish to live. At the same time the Council needs to continue to house applicants in housing need and comply with all relevant legislation. Applicants can therefore apply, subject to eligibility, for vacancies that are advertised. In making this choice applicants need to consider their housing need priority against the availability of properties in any given area.

The Council also recognise the benefits of being able to create chains of moves, as a result of direct letting. Also, during 2013/14, the Council has enabled many people to move to accommodation they can afford, where previously the household has under-occupied a property. Direct lets and transfers have been used to manage the impacts of welfare reform, with significant success.

It is the Council's intention, over time, to develop an Allocation Scheme that is effectively a hybrid of a Choice Based Lettings Scheme and Direct lettings/Quota system, on the basis of an Annual Lettings Plan. On balance however, the allocations scheme will be significantly weighted towards choice being the dominant feature.

Managing choice

In some circumstances, applicants will be made a direct let of accommodation. In these circumstances, applicants will not be offered choice as the need to manage risk or to resolve a particular problem will be the primary determinant of any accommodation offered. This applies to those offered re-housing under the Witness Protection programme and Multi Agency Public Protection Arrangement, as well as in some other limited circumstances.

Applicants awarded Band 1 status will be expected to bid for the next suitable vacancy. This will be extended where no suitable property was advertised.

Where an applicant does not use the Band 1 status that has been awarded to bid for a suitable property, the Council will review the decision to award a high degree of priority and may decide to reduce the level of priority. The onus is always on the applicant to secure a suitable, permanent home, at the earliest opportunity.

Managing choice – homelessness

The Council will re-house homeless households who are owed the re-housing duty under homelessness legislation through a direct let to suitable accommodation in either the private rented sector or to a Housing Association or Council property, or through choice based lettings. Where an offer of accommodation is made but refused, the process of rehousing will cease and the applicant will be required to make his/her own arrangements for accommodation. He / she will be able to access the Housing Register, assuming they fall into one of the preference categories described in Band 1 or 2.

Homeless households who are subject to investigation and / or an offer of a private rented sector property, will not be granted access to the housing register. Once the Private Rented Sector Offer has been accepted, the applicant may apply, and will be assessed in line with the Allocations Scheme.

Introductory Tenancies

Introductory Tenancies and Starter Tenancies provide increased management support for new tenants usually during the first twelve months of a tenancy but may be extended beyond this. This initial period also provides reduced security of tenure, though progression to a full secure, assured or fixed-term tenancy is automatic at the end of the period, provided there have been no breaches of tenancy resulting in the commencement of possession proceedings. The Council introduced Introductory Tenancies from 1st April 2013. Aragon Housing Association issues Starter Tenancies, and other Registered Providers in the area may do the same.

3. Legal Framework

The Allocation Scheme sits within a tight and complex legal framework. This section describes this legal framework.

The 1996 Housing Act (as amended by the 2002 Homelessness Act) requires Local Authorities to make all lettings and nominations in accordance with a published Allocation Scheme. A summary of the Allocation Scheme must be published and made available free of charge to any person who asks for a copy. A summary of the Allocation Scheme and general principles is available from Central Bedfordshire Council offices at Watling House and Priory House and on the Council's website (www.centralbedfordshire.gov.uk). The full printed version of the Allocation Scheme will be made available on request at a cost of £10 per copy.

The Housing Act 1996 (as amended), requires Local Authorities to provide 'Reasonable Preference' in their Allocation Scheme to people with high levels of assessed housing need. This includes homeless people, those who need to move due to welfare or medical grounds, people living in unsatisfactory housing and those who would face hardship unless they moved to a particular locality within the Local Authority's area.

The Localism Act 2011 allows local authorities to have significant control over who qualifies for housing and the priority given to national and locally determined groups that are assessed as being in housing need. These flexibilities are now reflected in this Allocations Scheme.

The Council has embraced the changes to allocations legislation brought about by the Localism Act 2011, with particular emphasis on the introduction of qualifying criteria for access to the Housing Register and the new priority giving priority to working households.

This Allocations Scheme takes into account the Allocation of Accommodation Code of Guidance for Housing Authorities 2012 which replaced all previous statutory guidance on social housing allocations. The Allocations Scheme is drafted and framed to ensure it is compatible with the Council's equality duties including the Equality Act 2010 and has been subject to a full published Equalities Impact Assessment. which is available on the Council's website. The policy will be regularly reviewed to ensure that its implementation does not have a disproportionate disadvantage for a person with a protected characteristic as compared to those that do not share that characteristic.

Rural Exception Schemes

Rural exception schemes are an important provision of affordable housing and contribute to the sustainability of rural and village communities. In Central Bedfordshire, a number of successful schemes have been delivered in recent years. The Council has an obligation to ensure that priority for vacancies in rural areas is given to households with a relevant local connection. The Council has a formally agreed policy on rural exception sites which is set out as Appendix 2. Special rules will apply when prioritizing applicants who are being considered for housing in a village where a rural exception policy is in place. All such village vacancies will be advertised with priority given to those with a local connection to that village. The connection definition in the Section 106 agreement is set out below.

The intention is that properties will be let to applicants having a local connection to the parish. Where there are no eligible applicants having a connection with the parish, the allocation has to be made to eligible applicants with a local connection to a neighbouring parish. If still no such applicants exist, an allocation can be made to eligible applicants with a local connection to the Central Bedfordshire area.

A local connection is (in order of priority):

- Current residence in the parish for a minimum of 2 years, or a previous residency in the parish for a period of not less than 10 years
- Family connection through mother, father, brother or sister, son or daughter being resident in the parish for a period of not less than 2 years
- Employment in the parish as a main place of work, for a period of not less than 2 years
- Current residence, family residence, or an employment connection where the time period does not meet those stated above.

4. How the Housing Register is structured

The Housing Register is divided into two sections. This is explained below.

Section 1 – General Needs Housing Register

Section 1 of the Housing Register is for all general needs applicants. This is applicants who are NOT applying for sheltered accommodation for older people, designated older persons housing or extra care housing (see Section 2 below).

Applicants must fall into one of the qualifying groups for access to the Housing Register – set out on in Section 5.

In addition, applicants must attract Reasonable Preference. The Housing Register is only for applicants who can demonstrate they are in housing need.

The law requires that reasonable preference is given to the following categories:

- People who are homeless, including those who are intentionally homeless and not in priority need
- People who are owed a re-housing duty under the homelessness legislation, where this duty has not been discharged by an offer of suitable accommodation, which may be to a letting in the private rented sector.
- People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
- People who need to move on medical or welfare grounds, including grounds related to a disability
- People who need to move to a particular locality, where failure to meet that need would cause hardship to themselves or to others

In this Allocations Scheme, all of these categories are equal. If an applicant falls into any of the categories, he or she will be admitted to the Housing Register. The categories all have equal standing; having housing circumstances that cover more than one of those categories does not warrant additional priority.

The Council retains the power to give additional preferences to such persons, if it chooses to. The Council must and will give additional preference to certain categories of persons from the forces, in line with the Council's legal responsibility and long standing commitment to helping veterans and their families to resolve their housing need, in the context of the Central Bedfordshire Armed Forces Community Covenant.

Section 2 – Older Persons Housing Register

Section 2 of the Housing Register is for applicants over the age of 50 years who wish to apply for sheltered accommodation for older people and designated older person's accommodation.

Vacancies that fall within this category will only be open to this group of applicants.

Older people wishing to apply for general needs vacancies, who are in housing need may also apply for accommodation through the General Needs Housing Register.

The Council has embarked on an ambitious programme to deliver a substantial number of new build homes that are described as Extra Care housing, designed to meet the needs of frail older people, who typically may have both a need for support and also personal care.

This Policy does not set out the criteria for Allocations to Extra Care housing schemes. The Council is developing a new Policy, which will be consulted upon separately.

Designated keyworkers

This Allocations Scheme does not currently provide for any designated key workers. The Council believes that those seeking affordable accommodation locally, because they work in Central Bedfordshire, will be able to access the Housing Register and local homes, by virtue of the employment priority set out on page 17. However, this will be reviewed as part of the Lettings Plan.

If the Council finds that there are specific groups of employees who have difficulty accessing homes locally because of low income, for example, or where there are shortages of particular types of workers locally, then the Council may provide for these groups in the future by making available a quota of homes, of particular types, in prescribed locations, that are designated as being available to let to an identified group of key workers.

Whilst the Council's Allocation Scheme does not afford priority to a designated group of key workers, the Policy does provide scope to let homes to key workers in future where there is an identified need that is set out within the Lettings Plan. Specific criteria for priority will be identified and published within the Lettings Plan, in the event that a quota of homes are being made available to meet an identified need.

Supporting new business in Central Bedfordshire

The Council is keen to support companies who will bring employment opportunities into Central Bedfordshire, and require affordable homes for workers who may be low paid. To support these companies, the Council will consider making a percentage (%) of properties available in a given year – to assist the business in being set up, and attracting workers who can afford to live nearby. This will be done in the form of a quota and will be a one off number of properties. As such, this will be included in the Annual Lettings Plan and will be the result of joint working with colleagues across the entire council to ensure that corporate objectives are met (it is anticipated that these businesses will be required to make use of the local labour force wherever possible first).

Quotas

The Council may choose to make a percentage of annual lets available to certain groups of applicants, via quota schemes. Where this is the case, these will be set out in our Lettings Plan. Groups likely to be subject to a quota include:

- Clients with mental health issues, who are ready to move on from supported housing schemes; or are assessed as being ready to establish a tenancy on a permanent basis, with support as required
- Clients with a learning disability, who are ready to move on from supported housing schemes; or are assessed as being ready to establish a tenancy on a permanent basis, with support as required

- Foster carers, who need particular type or size of accommodation in order to foster, and have been approved as such by the relevant authority and are awaiting a placement
- Lettings for employees of new business in the Central Bedfordshire area, where this has been agreed as a corporate priority, or where a specific commitment is being made to support a local business or attract a business to re-locate to Central Bedfordshire
- Other people or groups of people who are identified as part of consultation with partner agencies.

The exact number of units available to each agency will be determined through a process of negotiation with each agency based on previous demand and projected need. The Annual Lettings Plan – drawn up at the beginning of each financial year, will set out the number of units available to each client group.

Clients who could be subject to a quota letting may well be registered on the housing register anyway – in Band 2 – if they are assessed as having a housing need. If they have no housing need at the time of application, they may not be registered.

Wherever possible, quotas will be managed through CBL. This is for the purposes of choice for the client, and for transparency. When a client is put forward by a partner agency as suitable for taking up a quota – the request will be assessed by the Housing Register Team. Once approved, the client will be awarded Band 1 status. This will be awarded for 3 bidding cycles (or longer if there are no suitable properties to bid for).

The client will be supported in bidding by the referring agency and / or floating support worker. If no bids are made, where a suitable property was advertised, the referring agency will be notified and the Priority Status may be withdrawn.

This Policy allows the Allocations Scheme to be varied through adoption of the Lettings Plan, to enable a quota of homes to be made available, to meet an identified, quantified need, provided that the Lettings Plan is adopted by the Council's Executive. In this way, the Allocations Scheme can be responsive to identified needs.

These quotas will be available to the designated service to nominate to as a minimum number of properties available for that client group, for (typically) a one year period that is reviewed on an annual basis.

A quota may also be set for transfer applicants. This will enable applicants in housing need to transfer via the housing register. This is particularly important for those affected by the spare room subsidy limitation. Transfer applicants will also have access to properties within the Available Now window (see page 33 and 34)

New lets on new developments may also be set aside for transfer applicants as part of the quota arrangements. This will be set out in the Annual Lettings Plan.

5. Who can join the housing register?

This section sets out those who qualify for inclusion on the housing register.

Section 1 – General Needs Housing Register

Everyone who wants to join the general needs housing register has to fill in an application form. This is to make sure that the Council has the information needed to decide priority for housing and to make sure everyone is assessed in the same way.

It is envisaged that during 2014/15, the Council will cease to use a paper based system of application forms to apply for social housing. Our aim is to reduce administration cost and to ensure that our staff resources are directed to where they can make the most difference.

The paper forms will be replaced with on line application methods, that are being designed to inform applicants whether they are eligible for social housing; how likely they are to be offered a home and how long they might typically have to wait. Whilst the new on line systems will include an element of self assessment, Council staff will be available to assist people to use the new systems, when they are introduced.

Normally, anyone can join the housing register so long as they are –

- Over the age of 16 years – conditions apply, see below
- Are in housing need
- Are not prescribed by law (see below page xx)
- Are not disqualified by the Council because
 - They have not lived in the area continuously for the last 3 years, or meet the employment in the area criteria
 - They are guilty of poor behaviour
 - They owe debt to the Council or to a Registered Provider
 - They have a poor tenancy history i.e. non compliance with a previous tenancy agreement
 - They have a household income of more than £30-50k per annum (before tax) depending on the size of accommodation they need
 - Are a home owner

Every application will be considered on its own merits and the Council will consider all circumstances before making a final decision on eligibility. If an applicant is deemed to be ineligible for the Housing Register, the Council will advise of this and inform the applicant of the right to request a review of the decision if he /she believes the decision is unjust. The Council, on review, will take into account any exceptional or mitigating circumstances.

The Council makes use of a credit reference agency in order to verify the information applicants give for assessment purposes.

Children aged 16 and 17 years, who are in housing need, should approach the Council's Children's Service, as the first point of contact. This is an important point of principle that is established by relevant case-law. Where an enquiry or application for social housing is made by a child, they will be referred to a named person in Children's Services who will provide appropriate advice and guidance which may include Housing Options advice that is overseen by Children's Service.

It is established in law that the primary responsibility for children aged 16 and 17 years in housing need, is with the Council's Children's Service. However, the case will be managed on the basis of close collaboration to achieve the outcome that is in the best interests of the child.

Details of applicants that are ineligible are set out below:

Those prescribed by law

This includes –

- Persons disqualified under Part VI of the Housing Act 1996 and associated statutory instruments, on the grounds that they are subject to immigration control, except for those allowed by law
- Persons not habitually resident in the United Kingdom, the Channel Islands, the Isle of Man and the Republic of Ireland, except for those allowed by law
- EU nationals with no leave to remain in the UK

Applicants under the age of 18 years – certain conditions apply

Applicants aged 16 or 17 years of age will be accepted onto the Housing Register, provided they are not otherwise ineligible. However, when allocating a tenancy to an applicant under the age of 18, then:

- A trustee must be appointed. A person under the age of 18 cannot be the legal owner of an interest in land, including a tenancy. The trustee would be the legal

owner of the tenancy and hold it in trust until the young person reached 18 years of age. Any such case will need to be jointly assessed by the Housing service and Children's / Adult Services before an offer of accommodation is made

AND,

- A suitable guarantor (i.e. somebody liable for the rent if the tenant does not pay) for the tenancy would need to be identified until the applicant reaches 18 years of age.

Applicants under the age of 18 years will always be granted an Introductory Tenancy or a Starter Tenancy and this will not become a secure tenancy until such time as they reach the age of 18.

Applicants with a history of poor behaviour

The Council does not allow access to the housing register to those applicants with a history of poor behaviour. This includes any applicant, partner or other member of their household who has been convicted of, or had legal action taken against them for violence, harassment, threatening behaviour, any physical or verbal abuse towards staff and residents in the area. Legal action includes relevant convictions, service of injunction, notice of intention to seek possession, a court order or revocation of licence to occupy.

Applications will be assessed on their own merits taking into account current and recent conduct along with any relevant supporting information provided by partner organisations, support workers and the Police.

Applications from people excluded under this section will need to demonstrate a change in behaviour. Usually, applications will be reconsidered after 12 months, during which time it must be demonstrated that there has been no repeat occurrence. Earlier reviews may be considered in exceptional circumstances, particularly where a household is engaging with support as part of the "Supporting Families Programme" approach in Central Bedfordshire.

Non compliance with a previous tenancy agreement

This applies where the Council is satisfied, having considered all available evidence, including the use of credit agencies, that an applicant (or a member of their current or prospective household) has failed to adhere to the terms of any current or previous social housing or private rented sector tenancy agreement terms and conditions. This includes failing to maintain any previous social rented or private sector rented property within the terms of their tenancy agreement, or committing acts causing or likely to cause nuisance or annoyance to neighbours or others in the locality of where they live or where they previously have lived. It also includes outstanding debt with a private landlord (subject to assessment, as per the process outlined below where debt is owed to the Council). Non-qualification will apply until the applicant has demonstrated, to the satisfaction of the Council that circumstances have changed such that the previous conduct is unlikely to

reoccur. In many cases this could include demonstrating cooperation with support agencies leading to a substantial improvement in behaviour.

Any new application will normally only be reconsidered at the request of the applicant and only where there has been no reasonable cause for complaint or concern against the applicant (or members of their prospective household) for a continuous period of twelve months.

Applicants who owe debt to the Council or Registered Provider

This includes current or former rent arrears (including temporary accommodation arrears), damage to a former social housing property or legal costs arising from court action in connection with a current or former tenancy. It also includes money owed where there has been a claim against the deposit scheme for damage or rent arrears.

This will be assessed at the point when the applicant's priority is being assessed unless new information comes to the Council's attention after their initial assessment.

The following procedure will apply:-

- The Council will consider whether the applicant still owes arrears/debt, and if they do, the extent of the arrears/debt. Procedures will guide staff decisions in this area.
- The Council will consider whether there are exceptional circumstances (see below). If there are exceptional circumstances then the applicant may not be subject to ineligibility despite the arrears/debt.
- The Council will consider whether the claimant has taken debt advice, acted on it, and entered into and begun to implement any arrangement to clear the arrears.
- The Council will consider whether an arrangement has been made, the amount of arrears paid off, any debt outstanding, and the regularity of any payments made.

The Council is keen to only deem applicants ineligible where there has been wilful refusal to pay debt.

Those who demonstrate that either they or a member of their household face life threatening circumstances and as a consequence require immediate re-housing, including domestic violence cases, will still be admitted to the Housing Register.

Applicants who have been deemed to be ineligible will be able to reapply after 12 months, when another assessment of circumstances will be made.

Residence and employment criteria

The Council has adopted a simple residential qualification criteria for persons applying for accommodation. They must have lived continuously in the Central Bedfordshire area for 3 years at the time of registration and need to remain resident in the area to preserve that

registration, or be in permanent contracted employment in the area and have been for a period of at least 6 months (see below).

The requirement to establish a residency criteria does not apply to the Older Person's Housing Register, but may apply to the Extra Care Housing Policy, at such time as a Policy is developed and approved.

Home-swapping, or mutual exchange, does not require a residency criteria to be established and is managed quite separately from the Housing Register.

Existing social housing tenants, resident in Central Bedfordshire, who wish to transfer because they have a housing need will not be required to demonstrate a residency criteria. Nor will they be subjected to a savings or earnings test.

Any new homeless applicants will have to satisfy the 3 year continuous residency criteria for access to the Housing Register. This does not affect their position / assessment under the Homelessness Legislation. This is purely for access to the Housing Register.

A person cannot claim a residency connection simply because they have relatives living in the area, however, if they are able to demonstrate a strong connection to the CBC area by reference to strong family associations whether by residence or employment, a residency connection may be granted. This must be a strong family association either by residence or employment of close family members in the area - that meets the residence or employment threshold in the policy. This means that the close family member must have lived continuously in the Central Bedfordshire area for 3 years at the time of registration and need to remain resident in the area to preserve that registration, or be in permanent contracted employment in the area and have been for a period of at least 6 months. Such cases will be considered by the Housing Needs Panel.

If the applicant gives or receives care, access to the housing register may be granted – see next page.

Employment criteria

Where an applicant wishes to move to the Central Bedfordshire area because of employment, they will be included on the Housing Register, once they have worked in the area for 6 months. This restriction to a minimum of six months may be varied where a specific commitment is being made to a business relocating to Central Bedfordshire, within the terms of a quota, within the Annual Lettings Plan.

The following conditions apply:

- The employment must be permanent employment and not simply engaged doing agency work on a temporary basis.

- The employment must be for a minimum of 16 hours a week
- Applicants may be self-employed with their business base in Central Bedfordshire.

Applicants that fall into this category – seeking to join the Register by virtue of employment – will have a full assessment made of their status by a member of the Housing Register Team, who will make a determination on eligibility. As with other decisions, this will be subject to a review if the applicant so wishes.

There are a number of exceptions to the residency criteria requirement. These are:

- A person who is serving in the Regular Armed Forces or
- A person who has served in the Regular Armed Forces within five years of the date of their application for an allocation of social housing under Part VI of the Housing Act 1996.
- In a class of people prescribed by regulation who cannot be deemed a non-qualifying person due to a lack of connection to one of the local authority areas. (For example MAPPA, MARAC, Witness Protection, owed a homelessness duty as a person fleeing Domestic Violence.)
- A 'looked after child' as defined by Children's Services in another region
- Giving or receiving care to a member of the family and to be denied access to the housing register would be detrimental to this. The Council will only give access to the Housing Register to somebody where care and support are an issue if there is no one currently living with the applicant who can reasonably provide the support they need.
- A person in receipt of care packages assessed and provided by social services in the CBC area.
- Covered by agreed reciprocal arrangements with members of the Homefinder Partnership.
- Their residence in Central Bedfordshire has been broken due to placement in an institution or care placement or supported living scheme outside the area; and had this placement not occurred they would have satisfied the residence criteria set out above.
- Applying for the Older Persons Housing Register
- Existing CBC tenant or tenant of a Registered Provider and living in the CBC area
- Where an applicant believes that they have strong grounds for needing to live in the CBC area, which are not detailed above, their case can be considered by the Housing Needs Panel.

People earning a high salary or significant assets

Applicants will not be entitled to join the housing register where there is a household income as set out below:

Over £30,000 per year where there is a one bedroom requirement

Over £40,000 per year where there is a two bedroom requirement

Over £50,000 per year where there is a 3 or more bedroom requirement

This figure, set as of 31st March 2013, will be increased annually by the rate of RPI. If the income threshold is exceeded following application to the Housing Register, the application will be cancelled.

The Council considers these figures per annum household income to be a sufficient financial resource to buy a home or pay market rent in the area and therefore such applications will not qualify to register for housing. However, this figure will be kept under review and an applicant may challenge on the basis of their individual circumstances, and the Council after a full assessment, will determine whether the applicant can afford to access the private market and whether access to the Housing Register is granted.

Applicants will also not be entitled to join the Housing Register if they have significant assets or savings to resolve their own housing difficulties. Savings or assets of £23,250 are considered to be sufficient to do this locally.

Home owners

Home owners will not qualify to join the Housing Register. This includes those who own a home abroad. However, the Council recognizes that a number of exceptional circumstances will exist where access to the Housing Register should be granted. These exceptional circumstances might include:

- When ownership is shared across more than one person/couple and the option to realise their assets to source their own housing solution is not available. The Council will insist that any action under the Matrimonial Homes Act is taken by the applicant where there is a right to do so.
- Households with insufficient equity in the property, so that once sold, they will not be able to resolve their own housing situation
- An older person who needs sheltered accommodation and does not have sufficient resources to secure this in the open market
- A disabled person whose home is deemed unsuitable for adaptations
- Emergency medical reasons to move e.g. cannot be discharged from hospital.
- Where an applicant is fleeing domestic violence and the ownership of the matrimonial home is still in the hands of the court.

The applicant will be required to provide appropriate documentation, e.g. proof of shared ownership, property valuation, income, report from social care team, hospital, GP, occupational therapist regarding the suitability and viability of adaptations in current property and any risk to health or life in order for an assessment and decision to be made.

Deliberately worsening circumstances to gain extra priority

Although relatively uncommon, it is appreciated that some people deliberately make their housing circumstances worse to give themselves an advantage over others. Examples include moving into accommodation that is unsuitable on health grounds and then applying for a medical priority, or moving others into their home to receive an overcrowding priority. The Council takes the inequity of this to the many others who ask to be assessed in line with the policy and who are simply waiting their turn very seriously.

Those who engineer their own circumstances so as to get an extra advantage over others will be penalised by the Council removing their application from the housing register for a period of 2 years and then reassessing the application on genuine circumstances upon reapplication.

Obligation to be truthful

Section 171 of the Housing Act 1996 makes it an offence to withhold information that the Council may reasonably require to assess your application, or to provide false information that leads to an applicant gaining a tenancy. The Council will take appropriate action (including legal action) against anyone who gains a tenancy, or tries to gain a tenancy, through knowingly providing false information. A person guilty of an offence under this section is liable on summary conviction to a fine. Legal proceedings may begin if:

- any false information is given, or information withheld, on application to the housing register
- any false information is given, or information withheld, in response to subsequent review letters or other update mechanisms
- any false information is given, or information withheld, by applicants during a review.

Applicants who give false or misleading information will be excluded from the Housing Register for a period of 2 years. Possession proceedings will be issued if a tenancy has already been granted.

The Council retains the ability, in exceptional circumstances, to exercise its discretion when making decisions with regard to including persons on the Housing Register. Such cases will be referred to the Housing Needs Panel for agreement.

All decisions made by the Council will take into account Article 8 of the Human Rights Act.

Right of review

The Council will write to anyone who is being excluded from the Housing Register detailing the reasons for this decision. Applicants will have a right to ask for a review of the decision made on their housing application. A fresh application will be considered if –

- The applicant's immigration status has changed
- The applicant can demonstrate good behaviour for a minimum of 12 months (see above)
- A minimum of 2 years has passed since the applicant has knowingly given false or misleading information, or withheld information that has been reasonably requested.
- The applicant's financial circumstances have changed and income and capital assets reduced below the threshold.

Proof of changes will be required to enable a review to take place and decisions at review will be made by the Housing Solutions Team

Section 2 – “Accommodation for Older People” Housing Register

To qualify for this section of the Housing Register, applicants must be over the age of 50 years. Applicants should note though, that scheme eligibility may vary, and will be included in any advertising criteria. Some schemes may be advertised with higher age limits.

The qualification criteria set out in the previous section – for general needs accommodation, will **not** apply. The following requirements will, however, have to be met.

Normally, anyone can join the Older Persons Housing Register so long as they are –

- Over the age of 50 years
- Are not prescribed by law
- Are not disqualified by the Council on any of the following grounds:-
 - They are unable to demonstrate a connection to the Central Bedfordshire area through residency, employment or immediate family living in the area.
 - They are guilty of poor behaviour
 - They owe debt to the Council or to a Registered Provider
 - They have a poor tenancy history i.e. non compliance with a previous tenancy agreement

Residency qualification

There is a more generous residency qualification for people over the age of 50, in recognition of the different needs of older people. Applicants should be able to demonstrate a connection to the area, either through residency, employment, or because they have immediate family living in the area.

Applicants will not physically need to apply for both registers if they wish to apply for both general needs and older person's accommodation – one application will suffice.

Sheltered housing

The same restrictions apply for sheltered housing as they do for the Older Persons Housing Register.

However, the Council is conducting a review of sheltered housing and may decide, in the future, to de-designate some accommodation, such that it becomes available for general needs.

This could reduce the supply of sheltered housing, in which case, new Policy provisions will be adopted by the Council that are specific to sheltered housing, which shall then replace this part of the Allocation Scheme.

Applicants with No housing need

Applicants who wish to register for Older Persons Housing, but who do not have a housing need will be placed in a special OP Band. This band will sit below Band 1 and 2, from which applicants will be shortlisted first. Applicants with no housing need, in the OP Band, will only be successful for properties where there are no applicants from Bands 1 and 2 who are shortlisted. The OP band is strictly limited for older person's accommodation. Applicants with no housing need under the age of 50 years will be deemed to be ineligible.

Employment Priority

The employment priority will not apply to the "Accommodation for Older People" Housing Register.

Older Person's Residency Priority

Applicants on the "Accommodation for Older People" Housing Register, who live within 2 miles of the advertised vacancy will be shortlisted above applicants who do not live within this proximity (within each band). This means that where more than one applicant in the same band bids for a property, priority for the property will be given to applicants who currently live within 2 miles of the vacancy.

Where there is more than one applicant living within 2 miles of the property for which they are bidding, priority will be given to the applicant who has been in the band the longest.

Where no applicant living within 2 miles of the property bids, priority for the property will be given in line with the allocations policy. Applicants who live more than two miles away from

the advertised property will be given no more priority for the vacancy than any other applicant.

The applicant must provide proof of residency at the qualifying address. Only originals of recent official documents, which must include the name and address of the applicant, will be accepted. The proof must be supplied at the time of application and verified at the time of offer.

Distance between the applicant's current address and the advertised vacancy will be calculated using Google maps to ensure consistency in the application of this policy.

6. The Banding System

The Banding Scheme applies to all housing register applicants– General Needs Applicants and applicants for Accommodation for Older People.

It does not apply to applicants for Extra Care schemes – this is being developed separately.

Applicants who apply to join the Housing Register will have their housing need assessed, and will be given a priority band if sufficient housing need exists. Where an applicant has no housing need, they will not be registered. Instead they will be able to access online housing advice and will be restricted to properties that may become available through the Available Now process.

If applicants have no need but wish to apply for the Older Persons Housing Register, they will be placed in the special "OP" Band.

Bands are the Council's way of making sure that homes go to people most in need. The bands take into account the people the Council has to give preference to by law and those people considered to attract additional preference for housing by the Council.

The Allocations Policy contains 2 bands. If a person is not assessed as being in housing need, in accordance with this Policy, they will not be awarded priority within either band.

These two bands are summarized below:

Band 1

Applicants placed into Band 1 have been assessed as qualifying for reasonable preference and have been granted additional preference in recognition of their emergency and extremely urgent need to move. Band 1 cases will be reviewed every month or where appropriate from the date of being awarded to ensure there is still an urgent need to move.

Applicants in Band 1 are expected to bid for the first suitable property.

Direct offers may be made to applicants that are not properly participating in the bidding process. Where a suitable direct offer is made and refused, the award of band 1 priority may be withdrawn.

A summary of Band 1 categories and criteria is set out in the table below:

<p>Band 1 – Emergency need to move. Reasonable preference plus urgent priority</p>	<p>Summary of criteria</p>
<p>Armed Service Personnel with urgent housing need</p>	<ul style="list-style-type: none"> • Serving members of the armed forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service • Bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner • Serving or former members of the Reserve Forces who need to move as a result of a serious injury, medical condition or disability sustained as a result of their service.
<p>Emergency medical or disability</p>	<ul style="list-style-type: none"> • Where the applicant’s condition is expected to be terminal and re-housing is required to provide a basis for the provision of suitable care • The condition is life threatening & the applicant’s existing accommodation is a major contributory factor and would be resolved by a move to alternative accommodation • The applicant’s health is so severely affected by the accommodation that it is expected to become life threatening • The applicant is unable to mobilize adequately in their accommodation and requires re-housing into accommodation suitable for their use • Applicants who are bed blocking in an institution or supported housing scheme at a significant cost to the authorities, and they have been agreed as suitable for independent living, and the relevant support is in place ready to go as soon as accommodation is found. <i>Please note this is a different definition to Band 2, ready to move on.</i> • Applicants who cannot manage stairs or be mobile within their existing accommodation, and the property cannot be adapted. <p>The Council will require a medical assessment to</p>

<p>Band 1 – Emergency need to move. Reasonable preference plus urgent priority</p>	<p>Summary of criteria</p>
	<p>be carried out. This will include contact with a range of health professionals where necessary.</p>
<p>Release of an adapted property</p>	<p>Where an existing social housing tenant who lives in the CBC area is willing to transfer to a suitable non adapted property, and no longer requires adaptations. This award is only given where there is a demand for that type of adapted property in that area.</p>
<p>Under-occupation</p>	<p>Where an existing CBC Council or RP tenant living in the CBC area will downsize to release 1 or more bedrooms, and is currently affected by the bedroom subsidy and as a result needs to move. Or where the applicant is moving into sheltered or designated older person’s accommodation.</p>
<p>Statutorily overcrowded</p>	<p>Applicants who are statutorily overcrowded</p>
<p>Private sector property that is in a seriously defective condition likely to significantly impact upon the health and/or safety of an occupant.</p>	<p>Where the Council’s appropriately authorized Officers have determined that the property poses a Category 1 Hazard under the Housing Health & Safety Rating System and the Council is satisfied that the problem cannot be resolved by the landlord reasonably or practicably, or in any case within 6 months; and continuing to occupy the property will pose a considerable risk to the applicant’s health. This includes a property that has severe damp, major structural defects, flooding, collapse of roof, seriously detrimental internal arrangements, and dangerous access arrangements.</p>
<p>Decant of Council Tenants where demolition is approved</p>	<p>Where approved for a move as part of a demolition programme that is authorized by the Council’s Executive or agreed via a partner RP.</p>
<p>Urgent management move</p>	<p>This will only be permitted in very exceptional circumstances where the applicant / tenant is facing a life threatening situation. This award can only be granted by the Housing Needs Panel</p>
<p>Existing tenants wishing to move to low demand properties and releasing 2 bedroom</p>	<p>This is only for existing CBC tenants or RP tenants residing in the CBC area. Where applicants wish to move from a 2 bedroom property into a 3 bedroom property, but do not have an assessed 3 bedroom</p>

Band 1 – Emergency need to move. Reasonable preference plus urgent priority	Summary of criteria
accommodation	need, but can afford to pay the rent because they are not LHA dependant. Note – these applicants will be subject to an affordability assessment by the landlord.
Applicants awarded band 1 priority under the quota arrangements	This is for applicants who are awarded priority under quota arrangements, where a partner agency has agreed that priority with the Head of Housing Solutions.

Band 2

Applicants placed in Band 2 will have been assessed as having a housing need to move and as a result have been assessed as qualifying for “reasonable preference”. Band 2 cases will be reviewed annually (from the date of being awarded) to ensure there is still a need to move. However, it is down to the applicant to ensure their application is maintained up to date and if there is a change that the Council has not been made aware of this could result in refusal of being short listed or an offer of accommodation.

A summary of Band 2 categories and criteria is set out in the table below:

Band 2 – Reasonable Preference (RP)	Summary of criteria
Armed Service Personnel	Where ex service personnel has one of the reasonable preference attributes noted within this table and does not have an urgent need to move
Under-occupiers	Where an existing CBC Council or RP tenant living in the CBC area wishes to move to smaller accommodation, but is not currently affected by the bedroom subsidy, or is not moving into sheltered accommodation or designated older persons accommodation.
Homeless households owed a duty by CBC RP category Sec 167(2)(b)	People who are owed a duty under Section 193(2) or 195(2) of the 1996 Housing Act by CBC – and where the duty has not been discharged by the offer of a private sector let or a direct let to a suitable housing association or council property . Where an applicant has received a direct offer of

Band 2 – Reasonable Preference (RP)	Summary of criteria
	suitable accommodation as a discharge of duty, they will not be eligible to apply for access to the housing register until a minimum of 12 months after the discharge of duty notification has passed.
Homeless households	This includes applicants who are homeless, but who are not in priority need and owed a rehousing duty by the local authority. It only includes applicants who have made a homelessness application and have received a decision on that decision. Applicants who are deemed to be not homeless under Part 7 of the Housing Act 1996, will not be able to claim RP under this section.
Overcrowded households RP category Sec 167(2)(c)	Applicants who are overcrowded according to the bedroom standard. This includes: <ul style="list-style-type: none"> • Overcrowded - Households lacking 1 bedroom (assessed with the Bedroom standard). Relevant to Housing Act 2004. • Severely Overcrowded - Households lacking 2 bedrooms (assessed with the Bedroom standard). Relevant to Housing Act 2004.
Medical grounds RP category Sec 167 (2)(d)	Where an applicant’s housing is unsuitable for medical reasons or due to disability, but who are not housebound or whose life is not at risk due to their current housing. Housing conditions directly contribute to causing serious ill health. A medical assessment will be carried out.
Living in unsatisfactory housing lacking basic facilities RP category Sec 167 (2) (c)	Applicants without access to one or all of the following facilities: <ul style="list-style-type: none"> • Bathroom or kitchen • An inside WC • Hot or cold water supplies, electricity, gas or adequate heating <p>Applicants who have shared facilities in shared accommodation will not qualify under this criteria.</p>
Hardship / welfare / exceptional need to move for care or support or housing need due to age or vulnerability	Move on from supported housing, where there is adequate support from relevant agencies and a recognized and assessed support need (e.g. mental health). On going floating support must be agreed to be provided once an offer of accommodation is made.

Band 2 – Reasonable Preference (RP)	Summary of criteria
<p>RP category Sec 167(2) (c) and (d)</p>	<p>Clients with mental health issues or a learning disability, who are assessed as being ready to establish a tenancy on a permanent basis, where on going floating support is to be provided once an offer of accommodation is made.</p> <p>Move on from hospitals or an institution where there is an agreed support plan in place e.g. hospitals / prison / supported housing scheme</p> <p>An up to date care plan, risk assessments, medical assessments would need to be provided to ensure an applicant is suitably housed.</p> <p><i>This may include non priority homeless applicants</i></p>
<p>People who need to move to avoid hardship</p>	<p>This category includes low paid workers who live in the private rented sector, who struggle to make ends meet and as a result experience hardship. Applicants may otherwise be adequately housed but are experiencing financial difficulties due to insecurity, high rent levels and low pay. Full definition is below.</p>
<p>People who need to move, to enable them to provide foster care to looked after children.</p>	<p>This category is intended to support parents of foster children, on the recommendation of the Assistant Director, Children’s Services. Each case will be considered on individual merit.</p>

OP Band

Applicants with no housing need, seeking Older Persons accommodation only.

Determining priority within bands

Applicants will be able to bid for advertised properties each advertising cycle. For each advertised property a shortlist is drawn up, consisting of all of the bids received. Applicants in Band 1 will be shortlisted above applicants in Band 2. Working applicants in each band will be shortlisted above non working applicants. More details on the short-listing process are set out in section 8 on page 40.

Employment Priority

The Council will provide advice and assistance to applicants who are not working, or seeking employment. Staff will be trained to provide advice to applicants, with regard to training and employment services. It is anticipated that there will be considerable joint working between housing and employment services in order to help lift people into work.

In implementing this policy the Council will monitor the recorded successes of the various access to employment schemes, in particular with regard to persons with protected characteristics to ensure that the policy does not indirectly discriminate against certain groups.

Applicants who are working will be shortlisted above applicants who are not working (within each band). The only exception to this is where applicants are being shortlisted for a sheltered scheme – employment priority does not apply to specific older persons sheltered schemes. The employment priority will not apply to the “Accommodation for Older People” Housing Register.

Applicants must be working at the time of verification (at shortlisting time) to qualify for the employment priority). The Council uses the following definition of working households:

- Applicants who are in permanent paid employment for more than 16 hours a week and have been in employment for at least 6 months (this includes those on apprenticeships where these conditions are met)
- Applicants who are on an apprenticeship scheme, and working more than 16 hours a week on the scheme
- Applicants who are self employed
- Applicants who are in long term stable volunteering positions, where a volunteering contract exists between the applicant and the organisation for which they work.

The applicant and or their partner must provide proof of their employment status. Only originals of official documents which must include contract of employment, payslips, bank statements showing the salary paid into the account, P45/P60 and tax returns will be accepted. Letters on headed paper from the employer will not be considered as acceptable proof. The proof must be supplied at the time of application and verified at the time of offer.

Where an applicant is self employed, they must provide proof of their self employment status and still satisfy the criteria at the point of offer. This must be evidenced through documented tax returns.

Disabled people of working age

Where an applicant or their partner is providing full time care (35 hours or more per week) to an elderly resident or disabled child and is in receipt of full carers allowance (except where carers allowance is not payable because of the age of the carer or other benefit restriction – evidence will be required to prove the applicant’s status in this regard), this will be considered to be in employment

Disabled applicants under retirement age who have been assessed as eligible for Support Element of the Employment Support Allowance due to their permanent disability which prevents them from participating in work related activities, will receive the employment priority.

Falling out of employment

Applicants must inform the Council in writing as soon as there is a change in their circumstances, which means that they no longer satisfy the employment criteria.

Assisting those tenants affected by the bedroom subsidy rules

The Banding scheme has been designed to give priority to those tenants who need to transfer because they cannot afford to remain in their current accommodation, because it is too large. Where they are adversely affected by the bedroom subsidy rules, these applicants are placed in Band 1 to facilitate a speedy move, in order to avoid significant hardship. Those wishing to move but not adversely affected by the bedroom subsidy rules will be placed in Band 2.

Tackling under-occupation

Where existing social housing tenants wish to transfer to smaller accommodation, but still wish to retain a “spare bedroom”, they will be registered for a move and allowed to bid for one bedroom in excess of their assessed need. This only applies to tenants transferring to smaller accommodation who can afford to retain that additional bedroom. An affordability assessment will be carried out to ascertain this. The landlord will conduct an affordability check and should be satisfied that the tenant’s income is sufficient to cover the rent and additional on-going bills.

Low paid workers

The Council wants to support low paid workers who are struggling to make ends meet in the private rented sector. This situation is not explicitly identified within legislation as attracting statutory reasonable preference; however, the Council is keen to see that a number of lets are made to these people who have resolved their housing need by renting privately, so for this reason, such applicants are identified as a Reasonable Preference group within Band 2. In order to qualify for this award, applicants shall meet the following conditions:

- Living in private rented accommodation in the Central Bedfordshire area
- Be working in a permanent role for at least 16 hours a week
- Be on a low income, unable to afford the rent that is currently being paid

A low income is defined as earning less than the gross monthly wage needed in order to be able to afford the average rent for a 2 bedroom house in Central Bedfordshire. This means that a low income is less than £24 000 per annum (before tax), or £2 000 per month.

Applicants with a Notice to Quit

The previous allocations scheme gave extra preference to those who approach the Council with an NTQ, when living with family or friends or in private rented accommodation. This has led to these applicants gaining advantage over others in similar situations but who do not present with an NTQ. This has been removed. Where applicants receive an NTQ, they will be assisted through the online housing options calculator tool or through housing options casework. No additional priority will be awarded.

Applicants without Reasonable Preference

Any applicant that has been assessed and NOT awarded Band 1 or 2 will NOT be placed on the Housing Register. These applicants will be provided with housing advice and assistance on alternative housing options available to them. The Council will do this via the provision of an online housing options calculator, to enable applicants to self assess.

Transfer Applicants

Tenants of CBC or a partner Registered Provider will be placed in Band 1 or Band 2 according to their assessed need. If they have no housing need for a transfer, they will not be able to join the Housing Register and will be given advice on mutual exchange and other HomeSwap / House Exchange options.

Transfer applicants will not be subject to the eligibility criteria of local connection, earnings or savings. These will not be considered in an assessment of eligibility for the housing register.

Shared Housing

In some instances, where there is no demand for family sized accommodation, these properties may be selected to be let as shared housing. This will provide accommodation for single people who will be nominated by colleagues from partner agencies / support workers. Nominations will be subject to approval by the Housing Needs Panel.

The Council's aim is to make best use of stock, but also to put in place an effective approach to meet the needs of single person households, in housing need. An approach to managing shared houses, with appropriate support to vulnerable people, will be developed during 2014/15

Available Now Window

All properties will be advertised on Homefinder (unless it is being used for a direct let). However, where a property is low demand and attracts no suitable bids from eligible applicants within the first bidding cycle, these properties will be offered first as a discharge of any homelessness duty to a homeless applicant or others due to particular urgent housing need, and then secondly they will be placed in the Available Now Window.

This is a three stage process.

Step 1 – properties advertised on *Homefinder* for 1 bidding cycle. If not let, move to stage 2 below

Step 2 – properties go into *property pool* for offer to homeless household as discharge of duty, or as a homelessness prevention offer to an applicant being caseworked by the housing options service, or to others deemed appropriate from the housing register due to their particular urgent housing need. These applicants may be living in homeless hostels or bed and breakfast accommodation.

Step 3 – *available now* window advert – short bidding cycle .

These properties will be well publicised on Homefinder, the Council’s own website as well as through other social media networks. Bidding for these properties will be via HomeFinder but vacancies may also be advertised elsewhere. Properties in the available now window will be offered to applicants with a local connection to Central Bedfordshire before being offered to those without a local connection. A local connection in this instance is defined as living or working in the area, or immediate family living in the area.

Applicants on the housing register will be able to bid on “available now” properties, but there is no special priority for them.

Given that the properties will previously have been advertised on the Homefinder site (for at least one bidding cycle), it is possible that the demand for these properties will be relatively low. It is not the Council’s intention to create a separate waiting list for these properties, but instead to provide a means by which Registered Providers are able to let any low demand properties in as short a timeframe as possible. A system for prioritisation will be published, if it becomes necessary to determine which applicant has priority over another, for an *Available Now* property.

The landlord will overlook a bid placed on an Available Now Window advert if the applicant(s) –

- Are not over the age of 16 years
- Are not prescribed by law (see below page xx)
- Are disqualified by the Council because
 - They are guilty of poor behaviour
 - They owe debt to the Council or to a Registered Provider
 - They have a poor tenancy history i.e. non compliance with a previous tenancy agreement

See Section 1 on page 14 above for further clarification.

Moving up and down bands

When an applicant first applies to the Housing Register, their application will only be accepted once all the required information is received when they will be assessed and placed in a Band with the date (and time) of acceptance as their ‘priority’ date. This is the date that will be used for any offers to be made to the applicant.

If the applicant subsequently has a change of circumstances their application will be reassessed and the applicant may:-

- Gain greater priority in accordance with the Policy and be awarded a higher Band. (Priority date will change to the date of the new banding).
- Lose priority or preference due to their circumstances and enter a lower Band. (Priority date will remain as original priority date).
- Be assessed as being in the same Band.
- May become ineligible to remain on the Council's Housing Register and be provided with housing advice and assistance on alternative Housing Options available to them.

7. The Registration and Assessment Process

It is intended that applications for the Housing Register can only be made online. These changes will be introduced during 2014 or 2015. There will be a period of transition to this system during which paper forms will still be available.

Applicants are encouraged to complete the online self-assessment followed by the online application form themselves. However, if completed at a Council Office, staff will be available to go through the form or online self-assessment to ensure that the required information is collected. Assistance for clients is also available through support providers if required. These workers will be trained by Council staff.

Where necessary, home visits will be carried out to assist in completing application forms.

Having received the application in full, including the required supporting information, then the assessment and awarding of any priority in recognition of the applicant's housing needs will be carried out by staff from the Council.

The Council will assess the size of property the applicant requires based on the number of people living in the household.

Overriding medical and welfare factors will be taken into account when determining any additional bedroom requirement. Guidance will be sought from a medical practitioner or involved professionals and a determination will be made by the Council on whether additional bedrooms are required.

Eligibility will also be dependent on whether the property can accommodate a household size, for instance properties with very small bedrooms may not accommodate larger households.

The Council may also exercise discretion in order to facilitate transfer of tenants under – occupying family accommodation and willing to move to a smaller property, or where there is a requirement for the tenant to permanently vacate their home due to refurbishment or planned redevelopment, or where permitted by the provisions of a local lettings plan.

An applicant may only include immediate family on their application for housing. Immediate family includes:-

- The applicant
- Spouse or partner, including same sex partners.
- The applicant's children or partner's children and live with the applicant all the time, or for four or more nights every week. Applicants will be required to provide the Council with formal (e.g. Court Order) documentation relating to any agreement that is currently in place regarding residency.

Immediate family does not include an applicant's or his or her partner's parents, grandparents, brothers, sisters, aunts, uncles, grandchildren, nieces, nephews, cousins, friends, or lodgers unless they have an extenuating need to live with the applicant.

People who need to live with someone in order to provide or to receive care or support.

Applicants can include a person on their application if they need to live with them in order to give or receive care or support. This may include a carer, if no one in the applicant's immediate household is able to provide that care. Applicants will need to explain on their application the reason why the additional person needs to live with them and demonstrate:-

- That they need to be supported or cared for and are dependent on this person (this may be for an elderly relative who requires care or an adult child who is still dependent as they are in full time education).
- That other satisfactory arrangements cannot be made.
- That the arrangement is 'permanent'.
- The member of the household will need to be resident in the UK.

A carer is someone who, with or without payment, provides care and support to a partner, relative, friend or neighbour who would not manage without their help. This could be due to age, physical or mental health, addiction, or disability. In all cases the carer must have been identified by the applicant as the person who is primarily responsible for providing them with care and the need to live with them or near them.

Even if a carer is in receipt of Carer's Allowance this does not necessarily mean that it is necessary for them to reside with the person who is being cared for. An application to include a carer in a housing application will be considered if the carer has been assessed by Adult Social Care as needing to provide overnight support. In these circumstances the applicant must provide supporting evidence from other agencies.

Divided Households

Where a household is living apart only one application can be registered. In order to determine which property provides the basis of the housing needs assessment the circumstances at both addresses will be considered. A notional housing needs assessment will be carried out of both properties as if the household were residing together. The lowest needs assessment will then be applied to the application.

Review of applications

It is the intention of the Council to review all cases on the Housing Register annually and this may be extended to review cases more frequently especially where a home seeker is not actively bidding for properties that are available. Where suitable properties are advertised and a home seeker fails to bid, after the review has been conducted, the application may be removed from the Housing Register for at least 12 months.

Failure to respond to correspondence in relation to the review will result in the applicant being deleted from the Housing Register. Applicants who are deleted will be notified in writing. If good reason can be shown why there was a failure to respond to the review within 1 month of the application being closed then the application may be reinstated.

A Review may be initiated by the Council at any time and is likely to happen where an applicant has not been actively bidding for properties which are suitable. Applicants should not wait for their “*idea*” property before bidding, but should instead be pragmatic in deciding which properties to bid for.

Changes of circumstances

All applicants are required to notify the Council immediately of any change to their circumstances which may affect their priority for housing. Applicants who have had a change of circumstances and have not informed the Council, but it comes to the Council's attention, may have their application status changed to 'application is pending' whilst an investigation takes place in order to determine eligibility.

Applicants should notify the Council of any change in their circumstances by completing the online change in circumstances form or by contacting the Housing Register Team. This will include for example:-

- A change of address, for themselves or any other person on their application.
- Any additions to the family or any other person they would wish to join the application (Please note it is for the Council to decide whether they will allow a person/s to join the application).
- Any change in income, assets or savings
- Any change in medical conditions or property requirements

Cancelling an Application

An application will be cancelled from the housing register in the following circumstances:

- At the applicant's request
- Where an applicant does not respond to an application review, within the specified time limit.
- If the applicant becomes ineligible for housing
- When the applicant has been housed by a local authority or housing association
- When a tenant completes a mutual exchange

- Where an applicant moves and does not provide a contact address
- When an applicant has not expressed an interest in any available properties for one year

When an application is cancelled, an applicant will be notified of this in writing. A right of review will be offered, so the applicant can challenge the decision if he / she believes it to be unjust. This challenge must be made within 28 days of the cancellation.

Statutory overcrowding

An applicant who is statutorily overcrowded as defined by the statutory minimum overcrowding standards will be awarded 'Reasonable Preference' and Additional Preference and placed in Band 1.

Statutory Overcrowding is defined by the Housing Act 1985. The Government's minimum standards of space that it considers a family needs to live in.

This is determined by using two separate calculations to determine:-

- How many 'people' are considered to be part of the household?
- How many of those people are expected to sleep in each of the rooms available for this purpose.

Rooms available for sleeping:-

- All bedrooms and living rooms in the accommodation are taken into account in the calculation, whether or not the household is or wishes to use them for sleeping.
- Open plan kitchen/living rooms are included as sleeping accommodation.
- Bathrooms and kitchens are not included as sleeping accommodation.
- Rooms with a floor area of less than 50 sq foot (6.5 sq metres) are not included as sleeping accommodation.

The minimum requirement for the size of a bedroom occupied by an adult is 70sq ft or 6.5sq meters. 50 (4.65 metres sq) to 70 sq foot is only suitable for a child under 10 years of age.

Double room – 110 sq feet (10.22m²) is suitable for two people.

The Council may decide to exercise discretion in some circumstances to apply the Housing Health and Safety Rating System (HHSRS) to the consideration of whether a household is overcrowded. This is a risk based assessment , that can be applied to overcrowding. It shall be the Council's decision whether to apply HHSRS or to consider overcrowding on the basis of the statutory minimum standards.

Determining the size / type of property applicants are eligible for

In order to make the best use of the available housing stock, it is essential to let vacancies to those who need that size and type of property.

When deciding the size and type of property for which applicants are eligible, the Government's Bedroom Standard used for assessing Local Housing Allowance will normally be used.

Bedroom Policy

The bedroom policy that the Council uses falls in line with the Local Housing Allowance standards. This provides a bedroom each for the following:

- Parent (single parent or couple)
- Children of different sexes where one child is over the age of 10
- Children of the same sex where one has reached the age of 16

This definition will be used to assess bedroom requirement upon application, and to assess whether a household is overcrowded and therefore attracts reasonable preference.

In exceptional circumstances the Council, delegated as appropriate, may exercise discretion in deviating from the Bedroom Policy. Examples are:

- Where applicants require larger accommodation on health grounds. This will be considered on a case by case basis, taking into account the advice of a qualified medical advisor.
- Where the applicant has been approved as a foster carer by Children's Services, and so will need a larger property than normally required by the household. Children Services in discussion with the housing Service will determine the property size required.
- Where the applicant or a member of the household needs the support of a carer who will need to sleep in the home and cannot reasonably be expected to share a bedroom with another member of the household.

The Council will also allow working families who have a 2 bedroom requirement but who wish to be considered for a 3 bedroom vacancy, and can comfortably cover the rent, to bid for larger accommodation than their assessed need. This will only be allowed where the household is working, is not in receipt of housing benefit, and the applicant passes an affordability test set by the relevant Registered Provider.

Verification

Applicants accepted onto the Housing Register are required to submit, when requested, proof of identity for all the persons on the application, and proof of residence for all persons aged 16 years or over, covering the last 5 years. Examples of acceptable proof are:

For main applicants-:

- Passport and birth certificate (photo identification)
- Marriage certificate
- Driving licence
- National insurance number card
- DWP payment book or benefit aware letters
- Mortgage statements
- Council and / or housing benefit letters
- P60
- Payslips
- Bank statements

For children-:

- Birth certificates
- Child Benefit notification letters

The Council will take all necessary steps to guard against misrepresentation and fraud. Enquiries will be carried out with relevant agencies at any time. In most circumstances, an applicant's housing situation will be verified by a home visit.

Housing Needs Panel

The Housing Needs Panel sits once a fortnight or more frequently if required, and will make decisions on the following areas:

The Housing Needs Panel primarily considers cases that are particularly complicated and/or urgent, and not fully covered by policy.

Urgent need is defined as a situation where there is a substantial risk to the applicant or a member of their household in remaining in their current housing situation or in other exceptional circumstances not covered by existing policies.

The Panel may decide on a joint agency approach in order to determine the best course of action, particularly where an urgent move can be avoided and other solutions are to be considered. For example in case of self neglected or where there are safeguarding issues.

Before a case is referred to the panel it must be fully investigated and an opinion reached that the household requires additional priority. Papers must include the application to the Housing Needs Panel, a written report, risk assessment and supporting documentation.

There is no process of appeal.

8. How properties are let under the policy

Adverts

Properties will be advertised on the Council's choice based letting framework – Bedfordshire Home Finder. Applicants should bid for properties for which they would like to be considered.

Property adverts will contain clear details of any applicants restricted from bidding on the property, or any preferences as to those categories of applicants who will be shortlisted first.

Property adverts will contain clear detail of applicants who will be given preference for a property (for example, people requiring adaptations contained in a property, decanting tenants, transfers households, etc.) Where preference is given to specific applicants but no eligible bids are received from these applicants, the criteria may be relaxed and the property offered to the highest priority bidder who does not meet the preference criteria.

Some properties may be subject to a local lettings policy (LLP). In these cases it will be clearly stated in the advert and this will include details of any restrictions on households who are eligible for the property (for example, minimum/maximum ages of children). Some properties will not allow tenants to have pets. Where this is the case, this information will be included in the labelling on the advert.

Some properties are built specifically to give preference to households with a connection to a parish or village (section 106 planning agreement: Rural Exception Sites). Preference will be given to households who meet these connection criteria. Where a section 106 planning agreement is in place it will be clearly stated in the advert. A copy of the Rural Exceptions Scheme is available in Appendix 2.

Where the property size indicates that restrictions must be placed on the number of persons who can be accommodated, this will be stated on the advert, e.g. small bedrooms.

There may be occasions when the Council or Registered Provider may need to withdraw an advertised property. Reasons for withdrawal may include:

- An error in the advertising details
- Extensive works are required to the property
- The existing tenant has withdrawn their notice

(The list is not exhaustive.)

The Council may allocate a property outside of the Allocations Scheme by means of a direct let. In these circumstances, the property will not be advertised through the CBL scheme (Homefinder).

As part of the Annual Lettings Plan, a review will be published of all lettings activity in the previous year, setting out the number of properties let through Choice Based Lettings (CBL/ Homefinder) and also lettings through direct let, transfer or Quota.

Making Bids

What is bidding?

“Bidding” refers to an applicant expressing an interest in an advertised property. Bidding does not involve any form of payment. A bidder is a person registered on the scheme who expresses an interest in a property advertised through the scheme. Applicants will be able to place 3 bids in each bidding cycle.

How to Bid

Applicants or their nominated representatives will be able to bid using the following methods:

- The internet at www.bedfordshirehomefinder.co.uk;
- In person at the Council;
- By Proxy (A proxy bid is a bid placed by a friend or family member of the applicant, or another person or representative that the applicant has requested to act on their behalf);
- Auto bidding (The auto-bid function automatically allows the computer system to place bids on any available properties that match the applicant’s requirements at the beginning of each bid cycle.)

When placing more than one bid applicants will be asked to place their bids in order of preference from first to third.

Where an applicant has difficulty placing bids by one of the above methods, help and advice is available from the Council.

Auto-Bidding

The auto-bid function places bids on any available properties that match the applicant’s requirements at the beginning of each bid cycle.

- Type of property
- The area in which the property is located.
- Floor level.

Auto-bidding is available to applicants who are unable to access any methods of bidding and do not have a representative who can place bids on their behalf. The Council will also allow proxy bidding where an applicant is unable to bid for themselves.

Shortlisting

Applicants may only bid on vacant properties if they are eligible for the type of property advertised. Of those eligible bidders, the order of priority will be determined as follows:

- By Banding – applicants in Band 1 will be shortlisted above applicants in Band 2.
- By employment status. Applicants who are in employment will appear on shortlists above those in the same band who are not (within bands). This does not apply to the “Accommodation for Older People” Housing Register.
- By Priority date. Where two or more applicants bid on a vacant property and have equal priority, preference will be given to the applicant who has the earliest effective date of application.
- Where two or more applicants with exactly the same level of priority and effective date on the scheme bid for the same property, a senior officer will make the allocation based on best use of the housing stock and needs of the applicants. A record of how the decision was reached will be kept for the purposes of a robust audit trail
- Where an applicant bids successfully for more than one property, the applicant will be offered one property only, in accordance with the order of preference of their bids.
- Where sheltered or older person’s designated accommodation is advertised the older person’s residency criteria will apply. Where an applicant lives within two miles of the advertised vacancy they will appear on shortlists above those in the same band who do not (within bands)
- Where a property is subject to restrictions as part of a section 106 planning agreement, preference will be given to applicants who meet specific connection criteria to the parish.
- Where a property has specific adaptations (e.g. wheelchair access, ramps, level access shower), priority will be given to applicants who require the adaption in the property. Details of adaptations and criteria of applicants who will be given preference will be contained in the advert to allow applicants to make an informed decision whether the adaptation is suitable for their needs.

Between the period of being successfully shortlisted for an offer of tenancy up to the point of tenancy sign up, the applicant will not be permitted to bid on other advertised properties.

The Council or RP will contact applicants who have been shortlisted for an offer of tenancy. It is the applicant’s responsibility to ensure that all contact details are up to date and that they respond within 24 hours to any contact made by the Council. If an applicant does not return contact they will be overlooked for the offer. Exceptional circumstances will be considered e.g. where an applicant is seriously ill or in hospital

At the point of short-listing, an applicant’s circumstances will be verified. This is to ensure that the application has been correctly assessed and there have been no changes to the applicant’s circumstances since assessment of the application that would alter the priority awarded to the application or the household’s eligibility for the specific property they have bid on. If any changes have occurred that would alter the priority awarded or eligibility, the application may be overlooked for the offer of tenancy. The applicant will be informed of this using the most appropriate method of communication for that applicant.

Applicants may not be offered certain properties e.g. where the medical officer has advised a specific type of property – for example, where an applicant has medical priority for a ground floor property but bids for upstairs flats without a lift, or where there is a court order preventing a person from living in a certain location.

Where an applicant refuses a property the property will be offered to the applicant who has the next highest priority (Band, date priority) on the shortlist.

Note – Where a landlord carries out an affordability test and deems the applicant to be unsuitable for a particular property on the grounds of affordability, this shall be agreed with the Council before the applicant is over-looked.

Rural Exception Schemes

Some homes in rural areas will be subject to the Council's Rural Exceptions Site Policy, which means that these homes will be let in a different way. The rural exceptions agreement is attached as Appendix 1. Homes will be let strictly in accordance with the criteria set out in this Policy

Because the Allocations Scheme does not allow for general needs applicants with no strong local connection to be registered, there will be a separate mechanism for applicants who qualify under rural exceptions criteria, to express an interest in a scheme. Applicant details will be registered only for the village that they qualify for under this policy (if they do not meet the main housing register eligibility criteria). This will enable all applicants with a connection to a rural area, or Parish with a housing scheme to be registered for accommodation, should a vacancy arise.

Ineligibility for an offer

Prior to an offer of accommodation being made to applicants, the Council will reconsider the applicant's circumstances to satisfy itself that the applicant remains eligible and qualifies for allocation of accommodation under the allocations scheme as set out in Section 5 – who can join the housing register (page 14). Where the Council concludes that the applicant is not eligible for allocation or is not a qualifying person no offer or allocation of accommodation will be made.

Viewing a Property

Upon completion of the shortlist, up to 3 applicants may be offered an accompanied viewing of the property. Viewings with multiple applicants may be used to ensure that if the highest priority applicant refuses the offer, the property can be offered to the next highest priority applicant and so on.

Refusals of Offer

A refusal will include both verbal and written refusals, including those made prior to a formal written offer being issued. Failure to attend an accompanied viewing will be deemed to be a refusal of an offer.

Applicants in Bands 1

If an applicant in Band 1 refuses a suitable offer of a tenancy, the application will be re-assessed, which may result in the priority banding being removed or the applicant will be placed in Band 2, with their original date of application being retained.

Applicants in Bands 2

After two refusals an applicant in Band 2 will be contacted to discuss their exact requirements. Any subsequent bids not meeting the applicants more detailed specification will automatically be overlooked. It is not expected that an applicant will refuse offers in the hope of obtaining the “ideal” property. This Policy is intended to discourage applicants from holding out to obtain their “ideal” property and instead seeks to encourage applicants to be pragmatic in bidding for available properties. **After a third offer of accommodation is refused, the applicant will be removed from the Housing Register for a minimum period of 12 months.**

Homeless applicants that successfully bid through CBL, or who have bids placed for them, or who have been made a direct offer will be expected to accept the offer. Failure to accept the offer will mean the Council ends its duty to rehouse the applicant unless the applicant submits a suitability review and is successful.

A homeless applicant can move into a property and request a suitability review. If the applicant is successful in this they will be made another offer.

Due regard will be given to the individual’s circumstances and the reason for refusal of the property. Failure to attend an arranged accompanied viewing will be treated as a refusal.

Withdrawal of Offer

There may be occasions when the offer of a tenancy may be withdrawn. Reasons for withdrawal could include:

- A change in the applicant’s circumstances
- The applicant is found to be not eligible for the property
- An error in the advertising details
- Where the offer might put a vulnerable person at risk
- Extensive works are required to the property
- The applicant has attempted to obtain the property by deception

This list is not exhaustive and withdrawal will be at the discretion of the Council.

Feedback on advert

In the interests of providing an open and transparent service, regular feedback is provided. This will enable applicants to determine the likelihood of future bids being successful. The Council will provide this information by;

- Information about lettings in printed documents available at the Council offices or on request.
- Information about lettings on the website.

Lettings to council employed staff & to Members of the Council

In order to ensure that the Council is seen to be treating all applicants fairly, any application for housing or re-housing from members of the Council, employees of the Council or associated persons must be disclosed. These applicants will be assessed in the normal way but any allocation of housing will require special approval by a senior officer in the Housing Service.

The same will apply to Registered Providers who will publish their own policies in this respect.

Local lettings plans

At times, it may be necessary to agree a local lettings plan to ensure balanced communities are achieved with regard to economic and social factors of households on an estate or area and to ensure that the agreed key objectives of the Authority's Allocation Policy being met. The following criteria must be met:

- Clear objectives are agreed aimed at preventing or tackling defined social problems or creating balanced communities.
- Defined set of outcomes agreed.
- Outcomes monitored and reported on annually.
- It forms part of a strategy for tackling defined social problems or creating balanced communities.
- It has clear objectives aimed at redressing any identified inequality in accessing housing.
- It will not have disproportionate negative effect on other key objectives negating value of action.
- It will be applied for an agreed fixed period.
- Arrangements must be monitored and reviewed against established objective.
- Recommendation to adopt such an action will be considered and agreed by the Assistant Director, Housing.

Ineligible successors

Where an applicant is ineligible to succeed to a property but the council wishes to make an offer of a smaller property to save the applicant having to separately approach the Housing Options Team, a direct offer of accommodation may be made. These offers will be in accordance with the Council's agreed policy on ineligible successors

Non-Successors may be offered a discretionary new tenancy depending on their circumstances and housing need. If a new tenancy is to be offered it will be a direct let and one offer only.

Successors who are under-occupying and the Council is exercising its right to gain possession will only be able to bid on suitable properties in 3 bidding cycles (suitable property to be determined by housing need and can be anywhere within the Central Bedfordshire area). If the successor is unsuccessful then an offer of a direct let will be made.

How medical assessments are progressed and considered

Medical priority is restricted to two groups: Priority 1 - those with an urgent medical need for alternative accommodation and Priority 2 - those with a non-urgent medical need for social housing.

The definition of both types of priority awarded is included in the Banding table on pages 25 to 29 of this Policy..

The Council will seek the opinion of a medical professional to inform its decision on the award of priority in some cases where it is deemed necessary.

Letting adapted properties

Applicants with mobility difficulties and who have a need for adapted or accessible accommodation will be assessed in accordance with the Accessible Housing Register guidance (AHR) and will be matched wherever possible to properties that match their assessed need.

Applicants seeking adapted properties will also be able to bid for properties that are generally advertised, where they believe that properties would be suitable. Officers on short-listing will make an assessment on suitability for adaptation, assisted by an Occupational Therapist as required.

Making best use of stock

The Council will, wherever possible, seek to make best use of existing stock. Where accommodation has no demand, the Council and its partners reserve the right to consider a change of use for that property. For example, converting a 3 bedroom property into accommodation for shared use.

9. Reviews and appeals

Requesting a review

An applicant has the right to request a review of decisions made under part VI of the Housing Act 1996, in particular:

- Decisions about the facts of the applicant's case which are likely to be, or have been taken into account in considering whether to allocate housing accommodation to the applicant;
- Ineligibility for an allocation or lack of any reasonable preference based on previous unacceptable behaviour;
- Ineligibility for an allocation due to immigration status.

Decision letters issued in respect of housing applications will advise the applicant of their right to request a review and provide appropriate guidance on how to do this.

A request for a review of a decision can be made in writing or verbally to a member of staff. The request should be made within 21 days of the notification of the decision. Reviews will be considered within 28 days of the request being received and the applicant will receive a written response outlining the result of the review.

An applicant will only be entitled to one internal review. If an applicant disagrees with the outcome of the review, on the basis that the material facts have not been taken into account, s/he can make a complaint through the Council's complaints procedure (see below), contact the Local Government Ombudsmen usually once the complaints procedure has been exhausted or seek to challenge the decision via a judicial review. Disagreements with aspects of the policy itself will be noted and considered as part of the annual Policy review process.

Reviews will be carried out by an officer who was not involved in the original decision, and who is senior to the original decision making officer.

Complaints

The Council has a Customer Relations Team who can advise you on how to complain and log your complaint. You can make a complaint to any member of staff over the phone, face-to-face, using the freepost form on one of our comment, compliment, complaint leaflets, writing to the manager of the service, or email Customer Relations.

You can make a comment with a suggestion on how we can improve the service. Comments are recorded to help us review the services we provide. We will write to you and tell you if there is anything we can do.

Contact us by telephone or email – customer.relations@centralbedfordshire.gov.uk

0300 300 6077

0300 300 4995

You can also contact us by **Post**: Customer Relations, Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford, Beds SG17 5TQ

A complaint will be acknowledged in 3 working days. We will tell you how we plan to deal with your complaint, who will be dealing with your complaint and how long it will take. We will offer to discuss this plan with you.

A review of a decision is not the same as a complaint about the way a decision was made or your experience of the service that has been provided to you. If you are in any doubt, please contact the Customer Relations team who will advise you whether to appeal or complain. You will be provided with support to ensure that the issue is resolved, if at all possible.

10. Confidentiality, data protection and access to information

Applicant's Rights to Information

Applicants have the right to request such general information as will enable them to assess:

- How their application is likely to be treated under the Allocations Scheme, including whether they are likely to be given reasonable preference.
- Whether housing accommodation appropriate to their needs is likely to be made available to them.
- Details of any decision about the facts of their case which is likely to be, or has been, taken into account in considering whether to allocate housing accommodation to them.

Data Protection

When an applicant applies to the Housing Register, the Council will seek only information that they require to assess the applicant's application and housing needs.

The data protection principles which underpin the Data Protection Act 1998, are that data must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in a way which maintains the data subject's rights to privacy
- Not transferred to countries without adequate protection.

Confidentiality

Confidential information held about applicants will not be disclosed to third parties apart from:

- Where the individual who is the subject of the confidential information has consented to the disclosure

- Where the Council is required by law to make such disclosures
- Where disclosure is made in accordance with an information sharing protocol.

11. Equality and Diversity

The allocations scheme aims to recognize and support diversity to ensure that no sections of society are excluded and that the service meets the needs of those who may require additional care and support. This policy seeks to meet the needs of all applicants regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and to comply with all relevant legislation.

Use, operation and outcomes will be monitored to ensure no sections of the community are excluded or disadvantaged.

Appendix 1

Annual Lettings Plan

A Lettings Plan will be published on an annual basis and lettings made will be monitored against this. The annual Lettings Plan is devised to ensure that the Local Authority meets its statutory obligations. All lettings made under Part VI, are counted for the purposes of the Lettings Plan.

The Plan will be monitored and reviewed annually. If monitoring shows that outcomes are not as per the Lettings Plan, the Council reserves the right to implement a quota system to ensure that it meets its statutory obligations. Such a plan is a strategic tool that enables lettings practice to be linked to wider strategic issues.

This Plan outlines the anticipated supply of lettings over the coming year.

Broad targets that are to be set and agreed can be monitored and adjusted (if necessary) to ensure that priorities are delivered and the needs of those groups with Reasonable Preference are met.

A sample of reports that will be produced will be:

- Number of offers made outside of the Allocations Scheme and therefore that do not count towards this Lettings Plan.
- The number of direct offers made outside of CBL.
- High and low demand areas
- The percentage of a particular Reasonable Preference group that has been re-housed within the year.
- The outturn of which properties across areas have been let to which bands.
- Full bidding activity on the CBL system.

APPENDIX 2 – Local Lettings Policy for Rural Exception Schemes, adopted by Executive (February 2013) as part of the Housing Allocations Policy

1. Rural Exception Sites are a valuable source of new properties to help meet the growing demand for affordable housing and to promote rural sustainability. The Council gives such properties special treatment under its planning policy and its Housing Allocation Policy.
2. The Council will apply special criteria when allocating such properties and separate allocation arrangements will be made. The availability of properties on such sites will be advertised through the arrangements described in the Choice Based Lettings Scheme for not less than three bidding cycles (typically 6 weeks) but the advertisement will make it clear that the properties will be let using the special criteria described in this Appendix.
3. The intention is that the properties on such sites will be let to applicants having a Local Connection with the Parish in which the site is situated. Where there are no eligible applicants with such a Local Connection, allocation can be made to eligible applicants with a Local Connection to a neighbouring Parish; and if there is still no such applicants, an allocation can be made to an applicant with a Local Connection to the Central Bedfordshire Council area. All allocations will be made in accordance with the priority set out in clause 5 of this appendix.
4. All applicants for properties on such sites must meet the eligibility conditions described in the Housing Allocations Policy. The applicant must be in need of affordable housing.
5. A Local Connection is (in order of priority)
 - 5.1 current residence in the parish for a minimum period of two years; or previous residence in the parish, for a period of not less than ten years; then
 - 5.2 a family connection through mother, father, brother or sister, son or daughter, being resident in the parish for a period of not less than two years; and then;
 - 5.3 employment in the Parish, as a main place of work, for a period of not less than two years; and then
 - 5.4 current residence; family connection, or an employment connection, where the time periods conditions referred to at 5.1 to 5.3 above have not been met. Priority will be given in the order set out above.
6. The priority for allocation is clearly set out in paragraph 5.1 to 5.4 above. However, within each of those specific priority groups, the individual bids will be ranked in accordance with the banding criteria set out in the Housing Allocations Policy and applicants shall be allocated in accordance with the priority given by the Housing Allocation Policy



A great place to live and work

Contact us...

By telephone: 0300 300 8302 - Direct line to the Housing Register Team

by email: customer.services@centralbedfordshire.gov.uk

on the web: www.centralbedfordshire.gov.uk

Write to the Housing Register Team, Central Bedfordshire Council, Priory House,
Monks Walk, Chicksands, Shefford, Bedfordshire SG17 5TQ

Appendix 2



**Social Care, Health and Housing
Overview and Scrutiny Committee
12th May 2014**

Draft Housing Allocations Policy
Response to Formal Consultation

1. INTRODUCTION

- 1.1 The Localism Act 2011, introduced changes in housing law giving councils more freedom to determine who can apply for council and Housing Association housing and how their applications will be treated.
- 1.2 As a result of this, Central Bedfordshire Council (CBC) proposed a number of changes to the current Housing Allocations Policy. The Policy governs who can apply to the housing register, the size of the property which a person can apply for, and the priority of housing applications.
- 1.3 CBC formally consulted on its draft Housing Allocations Policy for 12 weeks from 4th November 2013 to 31st January 2014.
- 1.4 Each of Central Bedfordshire's housing 1500+ applicants on bands C and D (medium need and low/no need), who may be impacted by a change in Allocations Policy, were written to individually to provide notice of the formal consultation and to provide information about they could respond to the consultation.
- 1.5 The formal consultation was managed via a formal consultation document. This was available in paper format; downloadable from the CBC website, or was obtainable by telephoning or writing to the contact details provided in the letters to housing applicants.
- 1.6 CBC staff and elected members were informed about the formal consultation, social media was utilised and press releases were issued to the media to raise awareness of the consultation with Central Bedfordshire residents.
- 1.7 As part of the consultation process for the proposed Housing Allocations Policy the Interim Lead Officer for Housing Needs, representatives from the Housing Register Team and the Senior Estates Officer discussed the proposed Allocations Policy and provided additional qualitative feedback.

2. RESULTS OF CONSULTATION: DEMOGRAPHIC PROFILE

- 2.1 In total, 103 people responded to the draft Housing Allocations Policy formal consultation.
- 2.2 25% of respondents were housing register applicants, 16% were council or Housing Association tenants, 6% were from Town or Parish Councils, 10% were professionals, 16% were recorded as "other" and 17% did not include this information.
- 2.3 29% of respondents were male, 67% were female and 4 % preferred not to say.

- 2.4 45% of respondents were aged 55 years or over.
- 2.5 19% of respondents stated that they had a disability.
- 2.6 78% of respondents stated that they were heterosexual.
- 2.7 77% of respondents were White: British and 13% of respondents preferred not to state their ethnicity.
- 2.8 51% of respondents' stated their religion or belief was Christian and 30% of respondents stated they had no religion or belief.
- 2.9 Appendix 1 provides a full demographic statistical profile of respondents.

3. RESULTS OF CONSULTATION: QUESTION RESPONSES

The formal consultation was designed to capture both quantitative and qualitative data from respondents, with results summarised as follows:

3.1 Q1. Do you agree that people with no housing need should be stopped from joining the housing register?

Yes	58	57%
No	40	39%
Don't Know	4	4%

58 respondents (57% of respondents) agreed with this proposal. 28 respondents, (27% of respondents) who did not support or did not know if they supported the proposal provided qualitative feedback; issues over housing affordability were raised and that not all circumstances appear to be considered in the policy as it does not allow for any imminent/foreseen changes in circumstances.

3.2 The council wants to ensure that social housing is let to people with a 'local connection' in Central Bedfordshire. It is proposing to allow people to go on the register only if they have lived continuously in Central Bedfordshire for three years.

Q2. Do you agree with this proposal?

Yes	68	67%
No	31	30%
Don't Know	3	3%

68 respondents (67%) agreed with the proposal. 28 respondents (27% of respondents), provided qualitative feedback. Respondents supporting the proposal stated that people who work within Central Bedfordshire should be able to be housed in the area, respondents who did not or did

not know if they supported the proposal indicated that 3 years was too long and that peoples individual circumstances should be considered before imposing timescales. Individual circumstances included being closer to an elderly relative or fleeing domestic violence.

Q2a. If yes, do you think that 3 years is about the right length of time?

Yes	41	60%
No	24	35%
Don't Know	3	4%

41 respondents (60%) of the 68 respondents that supported the proposed 'local connection' component agreed that 3 years was the right amount of time.

Q2b. If no, how long do you think someone should have lived in Central Bedfordshire before they are allowed to join the housing register as a local resident? (Please tick one box that applies).

1 year	2	8%
2 years	4	17%
4 years	2	8%
5 years	12	50%
10 years	4	17%
Other	0	0%

Half of the 24 respondents who did not agree that there should be a local connection for 3 years, believed that 5 years was a more appropriate length of time.

3.3 Under the new Allocations Policy, people who do not live in Central Bedfordshire can be treated as having a local connection if they have been employed in Central Bedfordshire for 6 months. This is in order to encourage employers and workers into the area.

Q3. Do you agree with this idea?

Yes	68	67%
No	28	27%
Don't Know	6	6%

68 respondents, (67% of respondents, supported this proposal; 2 of these respondents, (3%), provided qualitative feedback stating that this will ensure continuity of employment.

25 respondents, (25% of respondents), provided qualitative feedback consisting of mixed opinions over the 6 month period being either too long or too short a time period. There was some support for those in employment renting from the private rented sector.

3.4 The new Allocations Policy proposes not to allow people to apply to the housing register if they have enough income to buy their own home or rent a home privately. It is proposed that different (before tax) income thresholds should apply for different property size needs as follows-:

- **Needing a 1 bed property - £30,000pa household income threshold**
- **Needing a 2 bed property - £40,000pa household income threshold**
- **Needing a 3 bed property - £50,000pa household income threshold**

Q4. Do you agree with this idea?

Yes	71	70%
No	26	25%
Don't Know	5	5%

71 respondents, (70%) supported this proposal.

Q4a. If yes, do you consider the suggested income thresholds to be fair?

Yes	53	75%
No	8	11%
Don't Know	10	14%

53 respondents (75%), supported the threshold proposals as fair. No respondents provided qualitative feedback for this question.

Q4b. If you answered no to question 4, please give a reason for your view, if you wish.

24 respondents (24% of respondents) provided qualitative feedback. These respondents indicated that thresholds are too high and questioned affordability.

3.5 As proposed, the new Allocations Policy will prevent people being placed on the housing register if they have savings or assets of £23,250 or more.

Q5. Do you agree with this proposal?

Yes	60	59%
No	32	31%
Don't Know	10	10%

60 respondents (59% of respondents) agreed with this proposal; 1 person referring to this being the same level as assessed for older people entering residential care.
31 respondents, (30% of respondents), provided qualitative feedback. These respondents indicated that £23,250 is too low based on current costs of living.

3.6 The Council is proposing a much simpler system for banding applicants for housing. At present, applications are assessed in detail to see how urgent their housing need is and placed into one of four bands - URGENT NEED, HIGH NEED, MEDIUM NEED and LOW / NO NEED. People can move up and down within their band depending on their level of need in relation to other applicants. This makes it difficult for people to understand what is happening with their application.

Under the proposed new system, there are two bands; one for very urgent housing need cases, and one for all other applicants. People will wait for housing, in the bands, in date order.

Q6. Do you agree with this idea?

Yes	62	61%
No	28	27%
Don't Know	12	12%

62 respondents, (61% of respondents), indicated that they agree with this proposal.

35 respondents, (34% of respondents), provided qualitative feedback; indicating that respondents who do not support this proposal experience the current system as working well and believe that the new system may be too restrictive.

Qualitative feedback from staff supports the change in categories however raises concerns that non urgent housing needs could be a large group with varying need levels.

3.7 The council proposes the introduction of an 'employment priority' into its allocations, so that working households are prioritised for properties over non-working households.

Employed people will need to prove that they are employed for at least 16 hours per week, with a contract of employment.

Volunteering and apprenticeships will count as employment provided these are similarly formalised arrangements.

As a high proportion of households on the current housing waiting list are non-working, this will not mean that non-working households cannot get a property, but they may wait longer than a working household.

Q7. Do you agree with this proposal?

Yes	67	66%
No	27	26%
Don't Know	8	8%

67 respondents (66% of respondents) support this proposal, 2 of which (3%) provided qualitative feedback that working households should be recognised.

24 respondents, (23% of respondents), provided qualitative feedback that did not support this proposal and raised issues regarding the current economic climate and that the impact of disability could affect how they will be assessed under the proposed policy.

Qualitative feedback from staff consultation included concerns of how assessments will be made with regard to people regaining employment and suggesting the inclusion of those people actively seeking employment.

- 3.8 We propose to exclude people who are bad tenants from the housing register. This includes people who have a poor tenancy history, those who owe rent from a previous tenancy, and people who have been violent, abusive or threatening. The Council will ensure that those households who are excluded will be given support to change their behaviour so that their application may be reconsidered in the future.**

Q8. Do you agree with this proposal?

Yes	82	80%
No	11	11%
Don't Know	9	9%

82 respondents (80% of respondents) agree with this proposal.

Qualitative feedback stated that supporting people to change behaviour will benefit the community.

9 respondents, (8% of respondents), did not support the proposal.

Qualitative feedback raised concerns about; where excluded people will go; the impact on any younger household members and that assessments should be made on a case by case basis.

- 3.9 Low paid workers who rent their homes from a private landlord are not treated as being in housing need in the current Allocations policy. The new Allocations Policy proposes to give people in this situation a better chance of getting a Council or Housing Association home.**

Q9. Do you agree with this proposal?

Yes	87	85%
No	12	12%
Don't Know	3	3%

87 respondents, (85% of respondents), agree with this proposal. 3 of these respondents, (3%), provided qualitative feedback stating that private tenancies are not always secure and that assessments should be based on the housing person's needs.

10 respondents, (10% of respondents), provided qualitative feedback indicating they did not support or did not know whether they supported this proposal; raising questions about whether people who had secured private rented accommodation were in housing need.

Qualitative feedback from staff contained mixed views with regard to this proposal. Support was given to the proposal due to the higher rates of rents within the private sector,, counterbalanced by issues with regard to the need to rehouse tenants that are already in adequate accommodation.

3.10 The Allocations Scheme proposes that applicants seeking older persons' accommodation have to demonstrate 'housing need' before accessing the housing register. We are aware that some older persons' accommodation, particularly some sheltered schemes and 1-bedroom bungalows attract no bids. Not being able to easily let these properties in the future is not a good use of our housing stock.

Q10. Do you agree that older people who do not demonstrate 'housing need' should be able to bid for vacant older peoples' accommodation, where these properties attract no interest / bids?

Yes	12	12%
No	1	1%
Don't Know	2	2%

12 respondents, (12%) agreed with this proposal, with 85% of consultation respondents not answering this question.

2 respondents, (2%), provided qualitative feedback and did not support or did not know whether they supported this proposal; including a raised concern that there should be a housing support need.

3.11 Q11. Please give any additional comments you would like to make on the proposed changes to the Allocations Policy.

50 respondents, (49% of respondents), provided additional qualitative feedback.

There was support for the draft policy as travelling in the right direction with regard to local connections, promotion of employment and inclusion of low income tenants currently in private housing.

Issues were focused on the policy not fully considering the needs of disabled people with regard to allocation of bungalows originally intended for older people.

Concerns were raised that people may not be able to continue to live somewhere that they have lived for most of their life due to not meeting the new criteria, therefore impacting on their social needs.

3.12 A full account of the formal consultation qualitative feedback is presented in appendix 2.

4. SUMMARY

4.1 In summary, the majority of the 102 respondents were in support of each of the 10 proposals put forward in the formal consultation; however question 10 recorded far fewer responses, 85% less, than others within the survey.

Whilst there was support for the proposals as being fair and welcome, the consultation raised a number of wider issues; that the current banding and assessment and banding system is fair and satisfactory, a new system may make the housing process more complicated as the current economic climate and unemployment levels may impact on the need for social housing and proposed changes to the Allocation Policy.

**Appendix 1:
Results of Consultation: Demographic Profile of Respondents**

12. Please tell us which type of respondent you are:

	No.	Percentage
Housing Register applicant	26	25.5%
Council or Housing Association tenant	16	15.7%
Professional	10	9.8%
Town/Parish Council	6	5.8%
Other	16	15.7%
Not recorded	28	27.4%

13. Please tell us your gender

Male	30	29.4%
Female	68	66.6%
Transgender	0	0.0%
Prefer not to say	4	3.9%

14. Please tell us your age

18-24 years	2	1.9%
25-34 years	12	11.8%
35-44 years	19	18.6%
45-54 years	23	22.5%
55-64 years	22	21.6%
65-74 years	12	11.8%
75+	3	2.9%
Prefer not to say	9	8.8%

15. Do you consider yourself to be disabled?

Under the Equality Act 2010 a person is considered to have a disability if he/she has a physical or mental impairment which has a sustained and long-term adverse effect on his/her ability to carry out normal day to day activities.

Yes	19	18.6%
No	74	72.5%
Prefer not to say	8	7.8%
Not recorded	1	0.9%

16. Please tell us your sexual orientation

Heterosexual	80	78.4%
Bisexual	1	0.9%
Gay	2	1.9%
Lesbian	1	0.9%
Prefer not to say	15	14.7%
Not recorded	3	2.9%

17. Please tell us your ethnicity

White: British	79	77.4%
White: Irish	3	2.9%
White: Gypsy or traveller	1	0.9%
White: other	3	2.9%
Mixed: White and Black Caribbean	0	0.0%
Mixed: White and Black African	0	0.0%
Mixed: White and Asian	0	0.0%
Mixed: other	0	0.0%
Asian or Asian British: Indian	0	0.0%
Asian or Asian British: Pakistani	0	0.0%
Asian or Asian British: Bangladeshi	1	0.9%
Asian or Asian British: Chinese	0	0.0%
Asian or Asian British: other	0	0.0%
Black or Black British: Caribbean	0	0.0%
Black or Black British: African	0	0.0%
Black or Black British: other	0	0.0%
Other	2	1.9%
Prefer not to say	13	12.7%

18. Please tell us whether you have a religion or belief

No religion	31	29.4%
Christian	52	50.9%
Buddhist	0	0.0%
Hindu	0	0.0%
Jewish	0	0.0%
Muslim	1	0.9%
Sikh	0	0.0%
Other	1	0.9%
Prefer not to say	16	15.7%
Not recorded	1	0.9%

Appendix 2: Results of Consultation: Qualitative Feedback

Q1. Do you agree that people with no housing need should be stopped from joining the housing register?

- I would differentiate between "need" and "deserve" People who may not meet the legal definition of "need" may still be in difficult circumstances which would be alleviated by rehousing, and may be more deserving in having lived in and contributed to the community for a long time.
- The very fact that currently those with 'no' housing need are able to secure tenancies indicates that these properties would lie dormant and unused for an indeterminate time. The fact that these properties may subsequently be separately advertised is a decent compromise on this but it would be hoped that those seeking housing advice with 'no' housing need are made very aware of this and to keep looking at these properties too.
- If a tenant is living in a 3 bedroom house but would like to re-establish their household in another area of the district for personal reasons I cannot see the justification for not letting them do this through the housing register. Subject to doing an affordability check, I would argue that they are in 'housing need' by definition of being in one of our properties; they are unable to afford a property in the private sector so cannot move. In many cases tenants wish to move to improve their situations, i.e. being nearer a family member that can provide childcare so that they can work or access a school that will suit the child of the family and thus improve their life chances. Forcing someone to stay in an area that they do not want to seems unjustified and likely to negatively affect their social wellbeing and therefore employability etc. Mutual exchanges are not always available for the exact places that all parties would like and it will be frustrating to have vacant properties come up in an area that a tenant would like to move to but they will not be allowed to bid for. We should be to reward tenants by letting them have the opportunity to move should they wish to. A tenant 'stuck' in a property and area they do not like is less likely to make a positive investment in either.
- Applicants in privately rented accommodation do not have security of tenure
- It is social housing and should be open to everybody
- I don't feel I know enough about it.
- I feel that each individual's situations should be taken into account. For example if a person owns the property jointly and the relationship collapses they may need to move so as not to develop financial problems

- I feel this is discrimination
- People could be in accommodation they can't afford.
- Even people in gainful employment struggle to find the money for the extortionate rents being charged in this region. The situation will worsen after January 1st when no doubt, thousands arrive from abroad. I know families that struggle to pay bills and buy food, in an effort to keep a roof over their heads!
- As people in those bands have very little chance of getting a home anyway are you just getting rid of "extra work".
- It may be that their circumstances are changing or due to change so are being both sensible and practical in advance. Our situation is that we are both adequately housed in two separate counties but policy and councils do NOT cooperate with each other in arranging suitable property, instead we have the equivalent of four bedrooms in two properties but only require a two bedroom property.
- I fled a violent partner and rent I have to pay a high rent and the house is not in great condition. I cannot get my ex out of the house and would have it repossessed if I lived there. If I gave up my job claimed benefit and went into a refuge I would be in a higher band. But I work and cannot get legal aid (I earn eleven pounds over) I cannot force him to sell the house. There is no equity in it anyway. I live in poverty due to my rent and have worked hard to provide a home for my kids and get no help and can not afford to heat the house or put on the immersion heater. We are poor and if I gave up my job claimed benefit and went into a refuge I would be considered. I am surely providing a good example to my children but do not qualify for consideration but I took my children away for their protection and mine.
- Why should outsiders get priority over LOCAL people
- Not a good idea if it stops younger adults getting on the register to move out of parental homes, otherwise ok
- I am single on a low income, and I get help with my rent which I am really grateful for. I am 55 years of age and renting privately. It scares me that if my landlady decides to sell her property I could be made homeless as I can not afford to rent at a higher PRICE.
- The reason we don't agree with it is because me and my partner have lived in Luton all our lives and we have to move from one place to another, we are 52 yrs of age we don't have any money to buy and private renting is not permanent so we always have this worry of some where to live...we both suffer bad with arthritis and it will get worse as

we grow older, we think it all depends on how long you have lived in this country and of course if you cant afford to buy...

- If people need to move boroughs to be closer to family they should be allowed to bid
- People who live in villages cannot afford to buy a property there or rent privately. So they have no choice but to leave their family and the village they grew up in. This is not fair. If there are council owned properties in a village then people from that village should be given priority above anyone else even if it is a 2 or 3 bedroom property and they are a single person they should be given priority over anyone from outside that village.
- The system at the minute is not that easy to work with and does not allow you to move if you only have slight need changes .This to me does make people get stuck in a rut and does hinder the customer and you weather that is through you getting rent or tax payments or the customer being more able to earn that money. For example my lifestyle requires the same size property but with direct garden space to make my life slightly simpler .I find social housing some times a good thing as it is a good first step for people with needs if they have had social issues .At the same time they can very quickly be abused by this same social system if you are working on something else and you do not fit the social trend at the time. I also think that there could be more direct communication on moving issues to make things flow better or to get the next person on the chain to get your first level of help.
- They are most likely struggling to pay private rent, have debts & child support agency to contend with or are in negative equity
- They should remain on the register because there situation could change at any time.
- It depends on the reason why they are classified as having low priority - for instance a young mother with 2 boys under the age of ten living in a first floor maisonette in Morcom Road, Dunstable. She would like a 2 bedroom house with a garden for her children but she will be classified as being adequately housed with low need. If she is working and able to pay the difference with the bedroom tax, then she should be considered for a three bedroomed house in addition to a two.
- Your definition of "Housing Needs" is very narrow. Many young people & people on a low income would struggle to raise the money for a deposit on a house, or to pay rent from a private landlord. What are they supposed to do?
- People who know that they will have a housing need in the near future (say, within 12 months) should be able to register an interest

- No I think everyone should have a chance to be able to say if they wish to stay on the housing register
- Some peoples 'housing' circumstances can change drastically so social housing can be their only hope
- Medical Grounds

There are a range of views here, with 57% of responders in support of this proposal. The Council proposes to introduce an online housing options calculator as part of the implementation of the new Allocations Policy. Where applicants are not eligible for the housing register, they will be steered towards a range of other housing options. One of these will be the ability to register for the Available Now Window. This is a window on the HomeFinder website where properties that are lower demand and have not received any bids from applicants in housing need will be made available. Clients who are assessed as not in housing need will be able to put themselves forward for these vacancies. We also plan to publicise this Available Now Window locally, with a range of employers, to give housing opportunities to other local people.

We are aware that applicants living in private rented accommodation lack security of tenure, but if we were to register applicants simply on that basis then there will be many thousands on the housing register. It is better to register them because they have another need as well as security of tenure. Additionally the draft policy makes provision for those who are struggling financially.

There will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases.

The definition of housing need used is one set down in law. We think this is a good place to start. The waiting time for accommodation in Central Bedfordshire isn't too long – less than a year on average, for those people likely to be rehoused. Those who think they have a future need can register as soon as that need arises and can still be rehoused quite quickly.

Q2. The council wants to ensure that social housing is let to people with a 'local connection' in Central Bedfordshire. It is proposing to allow people to go on the register only if they have lived continuously in Central Bedfordshire for three years.

Do you agree with this proposal?

- People who work in the area should also be allowed to go on the register
- If someone from outside the area obtains a permanent job in the area, and meets other criteria, they should be considered for housing
- Some people are in danger in other areas. You'd be excluding people
- People may need to relocate for work/ job prospects/ families etc.
- 3 years is far too long for people in housing need to wait
- This is telling people where they can and cannot live. I don't think this right.
- I agree in principle with local housing being for local people, but there needs to be consideration of various people and exceptions made for them. People fleeing domestic violence, coming from care and a wide variety of other reasons may require housing in a different area to where they have a local connection. It is very imaginable that someone may not have a local connection with any place if the requirement is they need to have lived somewhere for the last 3 years. This is very difficult for Local Authorities to work with because each policy is local, but actually that is not the person in need's fault and exception needs to be made in that case. Something along the lines of a person showing they could not get local connection status with any area they have recently lived in and therefore should be allowed to have local connection or allowed to be on the housing register in the area they have most recently lived in (unless they are fleeing that area for some reason) should be included. With this proposal we risk excluding those who have led a transient life, either through choice or not, which is fundamentally wrong. Where else can they go if no-one will take them?
- The criteria are too strict. Local connection should also include working in Central Bedfordshire or having immediate relatives living here currently (as per current policy)
- Should be same as Hertfordshire which is 5 years local connection
- People should have a choice where they live. E.g. to be near family or to seek work
- In exceptional circumstances, some applicants may be fleeing Domestic or other forms of violence. These cases may be applying from areas outside of Central Bedfordshire.
- Because it makes it more difficult to move to the area if they find a job.

- Because of people moving to the area for work or for family reasons and three years is to long
- If you have to move to an area for employment, you would need housing, also if an elderly parent needs support they might need to move closer to family
- People often need to move to a different area to find work and they will require housing and schools etc. in that area.
- Central Bedfordshire is a small geographical area and as far as I know is part of the eastern region and United Kingdom I see no legitimate reason for a person living in say Cambridgeshire not applying for a CBC property. You cannot claim to be supporting people to get jobs on the one hand and then restricting their ability to move to get a job on the other.
- In exceptional circumstances, some applicants may be fleeing Domestic or other forms of violence. These cases may be applying from areas outside of Central Bedfordshire.
- Anyone should be able to move around there own country for a number of reasons. I find your proposal a bit offensive.
- People in the forces may wish to return to their home county but have no longer any family
- I think people should be allowed to be considered for any area as you may want to move to be closer to an elderly relative. I wanted to be closer to my farther in Kesoe but Pilgrims took me off their list. He now has a carer paid for by the state when I could have popped round and checked on him daily if I was housed in that area or people might want to cross the border for work connections
- There may be examples of families where parents have separated (through domestic abuse, drug & alcohol addiction of one partner etc.) who have close extended family in CB which would give the much needed support network a single parent may need to prevent them from slipping into targeted children's services.
- Again if an elderly person has family living in area and they need to move to be closer to family
- If you're in an area then I feel you should be able to register.
- As I am on the Central Beds transfer list myself and have been for some time. I think if you have been on the list for a certain amount of time you should have as much rights as anyone else. I live in Luton but

Central Beds allocate properties in the Dunstable and Houghton Regis area which is just up the road from where I live.

- The question being asked is different in meaning to the definition in the proposals document. The wording in Question 2 should be kept, but with the addition of 'for any period within their lifetime' rather than 'for three years'.
- They should be allowed if they were born in Bedfordshire, not just Central Beds....
- For people who have relocated for various reasons and have no other way of being rehoused
- it should depend on somebodies circumstances e.g. a person maybe transferred in his work or found work in an area not where he was born e.g. I am a Londoner but found housing and work 34 years ago in Bedfordshire.

Responses from the consultation were mixed in their support for this recommendation, with the majority (67%) in support of the proposal. The policy defines local connection as having lived in CBC for 3 years, or having worked in CBC for 6 months, and as such the policy seeks to support wider corporate priorities in terms of the growth of the economy and sustaining employment. The policy defines local connection as living within CBC as the policy applies to the area within the Council's boundaries. Neighbouring boroughs are not included.

Members of the Armed Forces and Former Service Personnel are considered to have a local connection providing their application for housing is made within five years of their discharge. Bereaved spouses and civil partners of members of the Armed Forces will also qualify for a local connection, as too will serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result

These provisions recognise the special position of members of the Armed Forces (and their families) whose employment requires them to be mobile and who are likely therefore to be particularly disadvantaged by local connection requirements; as well as those injured reservists who may need to move to another local authority district to access treatment, care or support.

Some respondents felt that three years was too long a period, whilst others felt that five years was a more appropriate time period in which to establish a local connection. The Code of Guidance recommends that two years residency should be the minimum time frame in which to establish a connection. On balance it is felt that three years is an appropriate time.

For people wishing to move to Central Bedfordshire with no local connection, advice and assistance will be available in how to access other forms of accommodation, including private rented accommodation. Homeswap is available to assist social housing tenants wishing to relocate.

Concern was expressed that this approach would exclude households fleeing domestic abuse or other forms or harassment of violence. There are clear safeguards in law to protect those at risk of violence, including the provisions within the homeless legislation. Moreover there will be provision within the policy for dealing with exceptional circumstances.

Views were also expressed in relation to the policy failing to take account of those needing to move to the area to either give or receive support. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases.

Q3. Under the new Allocations Policy, people who do not live in Central Bedfordshire can be treated as having a local connection if they have been employed in Central Bedfordshire for 6 months. This is in order to encourage employers and workers into the area.

Do you agree with this idea?

- No - if people are in employment then they should rent from the private sector.
- I don't think 6 months is long enough. Some people would just do it to get housed.
- Should be at least 1 year
- People might take up short term employment just to get onto the list, and then drop out of work. Suggest they should work for at least 18 months.
- Employment can change so frequently, 12 months is a better suited time period
- 6 months is too long to wait for someone who gains employment in the area. They may be unable to take up a job offer if they have to wait 6 months before being able to make a housing application, bearing in mind they will not know how long they will need to wait before receiving an offer of tenancy.

- As long as the employment is permanent. I am unsure whether I agree with this morally, if applicants are working and able to help themselves they have more options than applicants that are not working. However, I do think that all applicants should be encourage to try and help themselves in whatever way, to resolve their own housing need but we should not penalise them for trying and not achieving work.
- 6 months is too long- where are they supposed to live if they've just got a job in the area? If people are unemployed they presumably don't have an income, so how are they supposed to find somewhere to live?
- It would mean a family would have to be separated and run two homes for at least 6 months. I work in the supported housing sector, and am concerned that if employed people get priority for properties with an over 50 criteria, where we supply support, our service will be greatly diminished, these properties should be held for people with a support need. I assume the priority for employed people does not include over 60 for sheltered housing?
- I think it should be slightly longer, maybe 8 months.
- If people have to work for 6 months in the area before being eligible to live here then where?
- I think it should be 12 months not a 6 months employment period. I do not agree with "those who owe rent from a previous tenancy" because the private renting is extremely high and can cause the rent arrears
- How on earth are workers to afford to travel or keep two places to live? They should be able to move asap.
- I could not get a local job and work in Cambridge.
- This will reduce the housing stock available for CB families. Persons moving for work must make an economic assessment as to whether the move is financially beneficial for themselves and their family in the same way that everyone else will do.
- I do not believe that people who choose to live in the area purely for work should be allowed to go onto the register unless there is a clear reason (i.e. perhaps specific skills required in the area could be given dispensation - e.g. shortage of nurses or rare skill where there is a desperate need in the area). If someone chooses to move into the area to work, that is their choice. It is far different from someone who grows up in the area and is unable to leave home due to affordability.
- Because they can drive to work or get transport via train and bus
- Should be at least 5 years working there.

- There needs to be very local employers for this to happen. People are some times within this system regardless of there working lifestyle a move or home does or could enable change to earn
- 6 months is a very short time, as many employment contracts are for short term periods. The period should be a minimum of 1 year's work. Also their current place of residence should be taken into account so that if they live within a 'reasonable' commuting distance (say 30 miles/40 minutes travel) of their employment then their priority on the housing register should be lessened.
- 6 months is too short, it should be a minimum of two and a half years.
- I think that this is considered to be a good part of the allocations policy but feel that six months is not a long enough period of time.
- I think that the period should be longer - at least 12 months. This would ensure continuity of employment
- I think the time period should be 12 months from starting the employment as this gives both the employer and the person employed to see if they are suitable for the position and if not and leave this then leaves them have been allocated a house/flat they could continue to live in it an be out of work stopping another more suitable applicant from being housed.
- Priority should be given to people who live in Central Bedfordshire.
- 2 years
- It needs to be 3 yrs. MIN or it could be used as a 'loop hole' to Instant housing, then they could commute to London with a house in Beds. Nice one eh!!

In the National Housing Strategy published in Autumn 2011, the government recommended local authorities to consider giving additional priority for social housing to working households.

The majority of respondents (67%) supported this proposal, however there were mixed views on whether the six months is too long or short a period in which to establish a local connection.

Respondents were concerned that people could access social housing by working in the area for a relatively short period of time. However the Policy aims to support working households and to support wider corporate priorities in terms of the growth of the economy and sustaining employment.

Others expressed concern that six months was too long to wait, especially if this meant a household had a long commute or had to pay for two lots of accommodation. However households accepting employment offers in CBC will be aware of all of the facts when deciding to accept the offer of accommodation.

On balance it is felt that six months employment is the correct time in which to become eligible to join the register, having to wait for a longer period of time may have a negative impact upon people's ability to sustain employment.

Some respondents felt that working households did not need access to social housing as they could afford to resolve their housing situation themselves. The aim of the Policy is to support low paid workers, and support households to remain in work. In addition to this it is hoped that the Policy will create mixed and sustainable communities. This part of the policy will only apply to households on relatively low incomes, as households with incomes over the income thresholds will not be eligible to join the register.

Q4. The new Allocations Policy proposes not to allow people to apply to the housing register if they have enough income to buy their own home or rent a home privately. It is proposed that different (before tax) income thresholds should apply for different property size needs as follows-:

- **Needing a 1 bed property - £30,000pa household income threshold**
- **Needing a 2 bed property - £40,000pa household income threshold**
- **Needing a 3 bed property - £50,000pa household income threshold**

Do you agree with this idea?

- This is basically saying that anyone with a wage of 30,000pa should buy a property or rent one privately. This is surely infringing on any ones right to housing. When housing around Dunstable Houghton Regis is very low. Why aren't the new builds advertised many would wish to live in them and would be giving up there own homes
- Every person's situation is different. Some private rents are very high and would not necessarily secure a nice property. There are very few one bedroom properties for rent, or available to buy on a £30k income.
- Income threshold too low. Start at £50K for 1 bedroom.
- Even with that income it's impossible to get a home loan. The amount should be adjusted

- I believe these levels of income are not necessarily enough to allow easy renting or purchase
- Everybody should be allowed on register with priority given to those on lower income
- The threshold should be lower for those requiring a one, two or three bedroom property. As social housing should be focussing on those who are in financial difficulty. I believe that the threshold should be 1 bed property £25k, 2 bed property £32k, 3 bed property £40k.
- I think someone with £20.000 has enough income to purchase a 1 bed. £25.000 is enough to buy a 2 bed and £30.000 is enough to purchase a 3 bed
- I earn 30.000 but do not have the means to put down a deposit and am also of the wrong age to do so.
- The figures given do not represent the cost of buying property in this area.
- A low income family will require a larger property than a one-bed flat!
- Because although their income is at this figure on application it could go down if/when a child is involved
- DISCRIMINATION
- The ability to buy or rent a home based on income is flawed by too many other factors.
- If the applicant has a disability e.g. in a wheelchair and needs specific adaptations then no landlord who private rents a property will be obliged to adapt the property and if only one person on the application is a high earner due to their partner being disabled then they still might not be able to qualify for a mortgage high enough to buy a property in the area.
- Private landlords do not give long term secure tenancies.
- If a person has a good wage they would look after the property better than the landlords do.
- If they have a medical need for special housing they should be allowed on the housing register.
- Everyone who haven't got own house should have chance for council house

- As I have previously pointed out, DEBT is a huge issue at the moment. So even if they are earning high their outgoings are more than likely higher too. Why else would they apply for housing i.e. Divorce, debts, Child Support Agency. There are more than likely people on a high level of debt
- The cost of living is sky high !..... if you earn £30,000 per year then you have to pay tax, then you have to pay the following: council tax, gas, electric, internet/TV, water, mobile/landline, TV licence, upkeep of property, furnishing house, clothing, food, etc. etc., and what are left with, NOTHING ! And if you own a car to go to work then you can add all those costs as well!
- Property prices too high to make these figures realistic, but there should be 3-5 yr. contracts.
- Age is also an issue, over a certain age mortgages are not available.
- The thresholds should be higher and it should be noted there is no security in renting privately. Association/social housing is a better 'feeling' to be in than private. You pay rent back to 'society'.

71% of respondents agreed with this proposal, and 75% considered the thresholds to be fair. Concerns were raised that the thresholds were too low, and that many households on those income levels would not be able to afford to access homeownership or private rented accommodation. The figures within the policy are well informed and have been modelled on the average property price, using property prices in the lowest end of the spectrum for each property size.

The Policy has a sliding scale of income thresholds that take into account both the family size and total income.

Assistance is available to households wishing to access home ownership through a range of low cost homeownership products including the Government's Homebuy scheme. A range of support and advice is also available for households to enable them to access the private rented market.

Views were expressed that outgoings should also be taken into account. In the interests of having a simple and transparent Allocations Policy this is not considered to be appropriate. However there will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases

Q5. As proposed, the new Allocations Policy will prevent people being placed on the housing register if they have savings or assets of £23,250 or more.

Do you agree with this proposal?

- This seems a high amount - but I am guessing that it is the same level of assets for an elderly person going into care. And I can't see a prospective tenant giving you a bona-fide savings book showing such a high level of savings!!
- This amount of savings would not necessarily be enough to secure a deposit on a mortgage.
- Savings or assets are too low. These savings are regularly for emergency funds. Why penalise savers!!! Any level should be at least £50K
- I agree with this proposal for people of working age, but someone retired with only £23k assets would be unable to buy, and this would not last long as rent.
- Tenants will be unable to receive Housing Benefit with savings, but their savings will soon deplete if paying higher private rents.
- How much you have in savings shouldn't matter.
- I think that we may be causing some people to fritter away their savings and then they may have to apply to us a few years down the line when their savings have been exhausted. This should be done on a case by case basis, for example, an older person may wish to have this money to pay for extra care should they need it.
- The savings levels will be affected by the number of people to be housed and a fixed figure for all is not applicable
- Should be open to everybody with priority given to those with lower income and/or savings
- I would be concerned for people with severe disabilities who may inherit money which may exclude them from accessing appropriate housing specifically designed for their needs. So I think there is a case for exceptions. Otherwise I think it would be fair to have savings thresholds
- I do not feel this sum is high enough.
- Some times they have to use this to live on

- How long before they drop below the limit, and then need to get on the register?
- I agree that there should be a savings/asset limit, but this amount may be insufficient - not enough to buy, unless in reasonably paid employment; could privately rent, but may not last long.
- Are we not supposed to save for old age?
- In today's world £23,250 isn't all that much. Not enough for furniture a new home, plus all the bills a figure more like £40,000 would be fairer
- Saving towards a deposit e.g. for shared ownership should be encouraged. A higher level should be set (40k) and the policy should index the amount annually to house price growth
- I think cases should be considered individually - my concern is the amount of deposit required to buy a property, and the type of employment. For example in some industries in the area it is 'standard practice' to be self employed and in this situation it is almost impossible to get a mortgage until you have at least 5 years of 'solid' accounts. Also, £23,250 is not much when you take into consideration the cost of stamp duty, legal fees, basic furniture etc. when setting up home. I think the savings cap should be more around £30,000. Also 'assets' is not the same as having actual money available.
- If they have a medical need for special housing they should be allowed on the housing register.
- Savings are savings and are not a regular source of income. Once they are gone they are gone. So if you have to put a limit on savings you should say £100,000 as savings that would prevent.
- Savings and assets should be considered very carefully because pension pots should not be included. In any event the figure you suggest is far too low.
- Actually NO I did agree but thinking about it even if someone had enough money for a deposit to buy a house what if they couldn't get a mortgage due to bad credit rating
- We would wish to see a more accurate definition of what would be included under assets. The monetary figure quoted is far too low given the current price of accommodation throughout the area.
- So if you 58yrs old and you have saved all your life and you now have £23,250 you should not be allowed on the register !... so should that person go to a bank for a mortgage ?... what mortgage company will give him a mortgage ?... and when he retires what should he live on ?..

- Would like some greater consideration given to this clause as "assets" may not always be items which a family would comfortably dispose of in order to fund their housing needs (for example items of sentimental value). Their unwillingness to part with such items could therefore make their application to this scheme invalid.
- This penalises savers and elderly
- Your new policy precludes people who have a very low income and do not qualify for a mortgage e.g. because they are on benefits and would not be accepted by a private landlord either
- It requires further qualification, it should not preclude those who cannot obtain a mortgage or can't rent privately.
- Regarding the 'Thresholds for Income and Savings': Savings seem a bit low, knowing how hard it is to get a mortgage these days. Anyone self-employed (more and more people are) will need to produce 5 years of decent accounts to even be considered. The current threshold would mean anyone in a self-employed situation and steadily saving up for a deposit on a house will get to the point where they are penalised. We would be happier if the savings threshold is adjusted to around £30k. We are not sure if the threshold is 'household' or 'per person' – assuming it is 'household' it is a bit low.
- Ridiculous discriminating £23,250 possibly somebodies life savings yet a little to help in a pension income. Savings or assets should be much higher
- In this day and age assets of the above sum aren't very high. Owing to the view, the cost of living keeps rising.
- Both couples (man & wife) should be allowed that money each. I have worked all my life 60 yrs, saved and paid all taxes.

59% of respondents agreed with this proposal. Comments were received that this figure was too low, and that this amount of money would not enable access to home ownership, there were also views expressed that savers were penalised under the Policy. Social housing is a scarce resource. The demand clearly outstrips supply, and as such those who have the financial means to access either private rented accommodation or home ownership will not be able to access social housing.

The savings threshold relates to the savings and assets of the whole household, and is in line with tests applied by the DWP and Social Care.

This income and savings threshold will not apply to the Older Person's Housing Register.

In relation to the savings of vulnerable groups there will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases

Q6. The Council is proposing a much simpler system for banding applicants for housing. At present, applications are assessed in detail to see how urgent their housing need is and placed into one of four bands - URGENT NEED, HIGH NEED, MEDIUM NEED and LOW / NO NEED. People can move up and down within their band depending on their level of need in relation to other applicants. This makes it difficult for people to understand what is happening with their application.

Under the proposed new system, there are two bands; one for very urgent housing need cases, and one for all other applicants. People will wait for housing, in the bands, in date order.

Do you agree with this idea?

- I have disability and I have stairs in my flat. I have tried transfer and find it totally wrong housing associations don't communicate with each other for available properties. I am presently in band 3 and can't manage the stairs. I think these changes would create more people sleeping rough. I think people need to have HOPE which you will be taking away
- Presumably those prospective tenants who do not meet the criteria will not be included in the second band? And that would mean that only applicants who are genuinely likely to get a property, because of their circumstances, are banded.
- I agree in essence. However, if urgent refers to people who have just entered this country and have nowhere to live, then I disagree.
- Existing system is fairer
- Bands do not provide fair assessment of needs.
- I do worry that with having only 2 strict bands there will be applicants in need that will not be accommodated and this could impact on other services; mental health, depression, homeless housing options, financial problems with debt because they are unable to live and pay their rent.
- Steps should be taken to reduce waiting time not increase it. This could increase it.

- I understand the need to simplify the system but I do think there needs to be a balance between this and having a hierarchy of need. In practice what your proposal suggests is that those with urgent need are treated as in high need and those with low need are banished from the register, and I am concerned that those with urgent need will lose out as a result.
- I think that the current system works well and brings more social benefit to the community. It also means that hard to let, or low demand properties should still be let fairly quickly to those who choose them rather than high need applicants being dumped in them. The low need band can still have an income threshold. I believe that we have sufficient housing stock to allow a 4 band system. The proposed system is likely to leave many properties empty for longer and then perhaps go to those with no need at all through available now.
- Some harder to let properties are let to people in lower bands. Housing associations will struggle to let those properties if there are only 2 bands
- The needs for social housing are many and various and I do not believe that two bands would truly reflect all applications.
- I believe current 4 tier banding works well
- They should keep the 4 bands system
- It doesn't give any flexibility for people's circumstances.
- There are many people on the register at present who are not covered in band 1 or 2 that I feel still should be considered
- Two bands would be too generalised and those in band 2 would find it extremely difficult to be housed yet they would have strong needs to be housed
- I see no issue with the current arrangements. An open housing register must be the most transparent
- DISCRIMINATION
- Cause I've been waiting long enough to be rehoused. No one seems to care that three of us are squashed into a small one bedroom flat with rubbish heating and mould running down the walls causing health problems.
- Would the date remain the same as it is now or will they be reset? Should they stay the same then I agree with this

- I know by my own experience that we cannot trust your method of assessing the need of applicants. When your date comes round, what then. Sorry you don't meet the needs chart so you'll need to apply again?
- Each case needs to be individually assessed
- Urgent to me means damage by fire or floods NOT COMING IN FROM OUT OF THE DISTRICT like foreigners (NO I am not a racist, but charity begins at home for those that have paid their dues and taxes).
- Two bands are very restrictive; most people will fall into band 2. Although the policy refers waiting in date order this is not strictly true as the employment priority proposal will override this.
- I think people who have lived in this country for more than ten years should have highest band.
- I feel that this would make people with mental health issues even less of a priority. It's all ready bad enough for mental health sufferers to get extra medical needs points.
- A more one on one system need requirement but with banding levels for new customers
- The system is unfair, British people that were born in this country should automatically go into band 1 - 2..... Immigrants should be placed in band 3 -4....
- This is too restrictive and doesn't allow enough flexibility according to individual circumstances.
- Please clarify- is this not the same as Q1?
- But being simpler does not necessary mean less hassle/frustration for customers to be rehoused.
- Very Urgent will have to be strictly defined or, it will be used as 'almost Very urgent and flexible there fore VERY wide OPEN to be abused
- We are concerned about 'overcrowding' being in band 1, as we feel this to be an open invitation for people to get higher up the list just by having babies. Surely there should be a system whereby people can request a larger house because they wish to start / add to a family, rather than have to become a case of overcrowding first and then get bumped up the list.
- Don't know of this system is fairer, couldn't somebody be on the list for ever without being housed? Monday to Friday I live in my lorry in

motorway service stations and return to my elderly parents home 40 miles away. 7pm Friday evenings until 3am Monday morning and I was offered band D

61% of respondents are in support of this proposal. Concern was raised that people with no housing need would no longer be able to join the housing register. Whilst the current policy enables people to join the housing register in practice these individuals have very low priority. The new policy aims to be a more open and transparent system, whereby individuals are much clearer about their prospects of being able to access social housing. We feel that this new system provides a fairer and more honest service for customers, in so far as customers understand their chances of accessing social housing, and if these are poor can be supported in accessing alternative housing options.

Social housing is a scarce resource; demand outstrips supply, and therefore social housing needs to be targeted at house holds in housing need.

Whilst there is support to continue to have 4 bands, the current position is unsustainable. The current housing register continues to grow annually and is largely made up of individuals with no prospect of being rehoused.

In order to ensure that all social housing, including low demand properties, are let in a timely manner an Available Now window will be introduced. These properties will be made available to individuals who are not on the housing register.

The new policy is not anticipated to lead to an increase in waiting times to access social housing; there will be fewer individuals on the housing register and as such less bids for each vacancy. Applicants will still need to actively bid for properties to ensure access to social housing.

Applicants eligible to join the new housing register will retain their existing joining date. Within each band, priority will be giving to those who have been in the band the longest. Those in employment will be given priority over households not in employment as defined within the Policy.

In response to concerns that the policy provides no flexibility to consider individual circumstances there will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases

- Q7. The council proposes the introduction of an 'employment priority' into its allocations, so that working households are prioritised for properties over non-working households.
Employed people will need to prove that they are employed for at least 16 hours per week, with a contract of employment.
Volunteering and apprenticeships will count as employment provided these are similarly formalised arrangements.
As a high proportion of households on the current housing waiting list are non-working, this will not mean that non-working households cannot get a property, but they may wait longer than a working household.**

Do you agree with this proposal?

- Again discrimination. If in employment in the area then try letting agencies but still allow them some banding so as to get into CBC. Also making sure the work is consecutive during the 45 wks of the year. This will not be cost effective for council and will push council who are already dealing with fraudulent claims etc. to their limits by making sure this person is going to be working solidly....If agency work it may only be temporary then what??
- In some cases stabilising people who are not working by providing a settled home may be an incentive to find work
- This discriminates against people who are unable to work e.g. due to health and disability reasons etc.
- Unemployed people are penalized enough.
- Social Housing should be provided for those who are most in need of housing and cannot get it through other means. This proposal means that those most in need, i.e. those who are not able to fund their own accommodation through work, lose out to those who are working and could potentially find their own accommodation, not least because they could have assets up to £23k and still qualify! Your proposal leaves leeway for those with 'disabilities'. Closer inspection shows this to mean people who receive the ESA support component. This therefore excludes a large swathe of people who the DWP consider to not able to work due to illness or disabilities and has placed them in the Work Related Activity Group. Whilst the Work Related Activity Component is meant to be for those who can't work now but could maybe work soon, that group in reality is shunted to JSA and then cannot claim because they are too ill to work, so have to appeal and get their decision changed at a Tribunal. This is not your system, but it is broken and you should not rely upon it. In other words I think you should consider those in either ESA group as not able to work and therefore give them Employment status, if you are to go ahead with prioritising those with Employment status for housing. You also have not considered that sustainable housing is often a prerequisite to sustainable employment.

In summary, I think this particular part of the policy is fundamentally flawed. The private sector by and large shuns those reliant on benefits, so the social housing sector, being state led and not market led, MUST provide that gap.

- This is a bit 'chicken and egg'. It is a simplistic way of looking at allocating social housing. While the idea of 'something for something' is laudable it does not address the complexities of individuals applying for social housing. I believe that it is difficult for someone to sustain employment while they are in housing need. For many people I believe that they should be able to establish secure and suitable housing before they can concentrate on employment, this policy will discriminate against those individuals that require more support in this area.
- Social housing should be more for people that cannot obtain housing any other way. Working households stand more of a chance in buying or renting privately. Also discriminating against people that CANNOT work for medical reasons etc. Everyone deserves a second chance. People may get penalised for bad behaviour when it may not have been directly their fault i.e. in a bad relationship or they may have been young, naïve or vulnerable at the time. Should be given the chance to demonstrate their behaviour has improved.
- Each application should be taken on its own merits and non working applicants should not be penalised if they are unable to find work. This will also push non working households into private rented property thereby increasing the amount of Housing Benefit claimed.
- Many people would like to work but cannot gain employment for various reasons.
- Would applicants that have been made redundant be considered?
- I don't see why people should be penalised because they are unable to work or find employment
- I don't agree. The purpose of council housing should be to assist those with the greatest need. Especially in a poor economic climate.
- Surely people that are unemployed will be needier of a property. At best I don't think it should.
- Most jobs advertised now are part time or zero hours. Where will non working people live who need to be housed? You can't get a job without a permanent address!

- So what is the proposal for these non working households? The streets, a workhouse? Whilst there are no doubt a proportion of these people that can work and choose not to.
- May be difficult to monitor if applicants are in and out of work. What will happen to very urgent?
- To discriminate by income is a crime surely. If not it should be. I thought your role was to provide for the people that appear to need and not only for those that can afford to pay there own way. Where do those people without a wage go from here?
- Employed people will pay their way AND look after a property whereas unemployed don't look after properties; also have to be subsidised by the council.
- This is not equal opportunity, CBC are penalising those people who do not have a job. In the current climate a job is not always easy to achieve. This is a fundamentally unfair criterion. From a voluntary sector viewpoint Volunteers do not have 'Contracts' because of employment law this would not be a term used in any arrangements we with volunteers. This would put both volunteers & us in an entirely different legal relationship. The VS might use the term roles and expectations, (not job descriptions for example), and would not have the normal expectations required of an employee – e.g. in terms of hours, regularity, fulfilment of actions etc.
- I am assuming this does not include people past retirement age. Extra support means spending more money!!!
- I don't agree with this some people are unable to work due to medical grounds. My husband had to.
- Agree in principal that working households should be recognised for their status but, thereafter, individual circumstances (such as ill health) should be taken into account.
- If someone is in work, they are more likely to be able to afford to rent privately or to buy. Council housing should be reserved for those who are not able to do so for whatever reason.
- Yes in principal providing the reason for not working is properly assessed.
- Secure & certified Employment must be for a MIN of 6- 18 months and not just a 6 months short term shortcut to housing.
- I lean to the idea that 'working households' should be priority in housing. But every case should be looked at individually.

66% of respondents agreed with this proposal. Concern was expressed that often individuals who were out of work were in the greatest need. In the National Housing Strategy published Autumn 2011, the government recommended local authorities to consider giving additional priority for social housing to working households. The Policy aims to support working households and to support wider corporate priorities in terms of the growth of the economy and sustaining employment.

Households not in employment will be given advice and support to access employment. The housing options team will work closely with partner agencies to ensure that targeted advice is given to households in housing need wishing to access employment.

The Policy will not discriminate against households who are unable to work due to medical reasons. Those in receipt of DLA because they are unable to work will receive same priority as working households.

In order to ensure that the Policy is not abused, people's circumstances with regard to continuing employment will be regularly reviewed. All Housing Register applications will be reviewed annually. Moreover verification checks will be made at the point of offering a property.

Q8. We propose to exclude people who are bad tenants from the housing register. This includes people who have a poor tenancy history, those who owe rent from a previous tenancy, and people who have been violent, abusive or threatening. The Council will ensure that those households who are excluded will be given support to change their behaviour so that their application may be reconsidered in the future.

Do you agree with this proposal?

- Needs to be looked at on a case by case basis.
- I don't think the council should be responsible or spend their budget on having to improve a person's behaviour it should be common sense to each person how to behave.
- Those in this situation are most likely to have a high need for help. There may also be reasons why they behave that way, e.g. difficult upbringing.
- The council must see that whilst being a bad tenant cannot be condoned. There seems very little thought as to what to do with these people. "Support to change their behaviour" is great but where will they live for this support to be given

- Although I agree that these people should be excluded from the housing register, the new housing allocations scheme needs to define who will be deferred from the register. If the allocations policy does not go into detail and each case is considered on its own merits, it will take the housing register team a lot longer to come to a decision on each application.
- You already do this. I mean exclude applicants. What future and when? I think there are many considerations that should affect this attitude.
- Although in principle I agree with this statement, there are concerns for families where one partner falls into this category and all the family including the children suffer. There needs to be flexibility and individual case reviews.
- I feel people need to live somewhere and the stagnant system does not help with these issues.
- We are concerned that there should be very robust support for those being excluded. It is also suggested that, in line with the Council's intent on giving support to those who change their behaviour, after the words 'abusive or threatening' should follow 'within the 5 years immediately prior to their application'.
- This is all very well, but where are such people to go? Private landlords will not take them if they are aware of their behaviour or rent arrears.
- Frustrating knowing that the council manage to successfully evict a tenant who breaks their tenancy and then they come straight back into the system. They need to learn in order for us to reconsider them; they need to change their behaviour.
- I would say YES only if they, and ALL members of the Family have continually changed there ways for 9 - 18 months for ALL of the Family and not just the parents.

80% of respondents agreed with this proposal. Views were expressed that applicants should be considered on a case-by-case basis and that there would be a need for flexibility and individual case reviews. The Policy states that cases will be assessed on their own merits. Applications will usually be reconsidered after 12 months. Earlier reviews may be considered in exceptional circumstances.

A detailed procedure guide will accompany the Allocations Policy, which will ensure a fair and consistent application of this and all parts of the Policy.

Households will be supported in changing their behaviour and there will be close working with key partners to access appropriate support.

Concern was expressed in relation to where individuals excluded from the Housing Register will live. The housing options team will continue to provide advice and assistance to households to enable them to access appropriate accommodation and support.

Q9. Low paid workers who rent their homes from a private landlord are not treated as being in housing need in the current Allocations policy. The new Allocations Policy proposes to give people in this situation a better chance of getting a Council or Housing Association home.

Do you agree with this proposal?

- If people already have a suitable, decent home, why do they need to be on a Council register?
- They have a right to bid on properties as some properties will never be their own. Some private landlords do not allow decorating etc. How will these people feel secure as the tenancy could be taken away from them within 3 months WITHOUT them being proved bad tenants? Also low paid workers means just that low paid. Not a lot of landlords want low paid. They insist on a month's rent plus a month in case of damage etc.
- Because most of the low paid workers are not from this country
- Should be based on housing need
- If they are in private rental accommodation and not struggling with the rent/bill why would they need to be given a higher priority? Surely they are adequately housed in accommodation they have chosen. However if they are in private rental accommodation and just about paying their rent with no money to live then yes their priority should be higher. I agree that people that live in Central Bedfordshire should have a local connection because they have lived continuously in Central Beds for a period; but what about applicants that have moved to the area and have been living in the area for 6-12 months (3 years is a long time to wait before you are eligible for housing if you are in need). It does seem unfair that family local connection has been removed from the policy because applicants sometimes need to move back to the area for family support/child care/elderly vulnerable applicants needing family support
- Those reliant on benefits - particularly through illness or disability, may not be able to manage their tenancies in the private sector if their rent is above the relevant Local Housing Allowance. Exception should be made for this group also. But overall it is good that some people will be allowed to move in from the private sector.

- Contradicts the proposal of those in private rented not being a priority
Some people need/ want to move to an area for family support etc. so should be allowed on the register if they can demonstrate this.
- No, they are currently adequately housed.
- Housing should not be based on ability to pay but on social need.
- Not sure on this as surely they were low paid prior to taking on the commitment of a property.
- What do you consider low paid? How much better chance?
- Just because they are low paid doesn't mean anything.

85% of respondents agreed with this proposal. There was a view that households in the private rented sector were adequately housed. However the Council wishes to support low paid workers who are struggling to make ends meet in the private rented sector. A low income is defined as an income less than £24,000 per annum.

In the National Housing Strategy published Autumn 2011, the government recommended local authorities to consider giving additional priority for social housing to working households. The Policy aims to support working households and to support wider corporate priorities in terms of the growth of the economy and sustaining employment.

Concern was raised that households in the private rented sector unable to work due to health issues or disability may also be struggling financially. There will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases

Q10. Do you agree that older people who do not demonstrate 'housing need' should be able to bid for vacant older peoples' accommodation, where these properties attract no interest / bids?

- I do agree with this, but wanted to say that only if there is a support need.
- Why would anyone that does not need a bungalow want to bid? I think your interrogation process will establish if they saved for there retirement or have a house or a villa in Spain. Give me one of these places.... Yes please!!!

Of those respondents that answered this question 80% agreed with this proposal. Housing related support will be provided to those households where a support need is identified.

Q11. Please give any additional comments you would like to make on the proposed changes to the Allocations Policy.

- Why has it taken you so long to come up with half decent proposals to focus on need as opposed to allowing the abuse of the system by spongers?
- A lot of these changes will cause a lot of problems. I don't work and disabled and only in band 3 my housing association has never contacted me although I have been on the transfer list for over a year now. I would like a 2 bed because I receive DLA I think we should be considered allowed to bid on 2 bed. Especially if it is hard to fill. After all our DLA is to help us with our disability and I am epileptic and suicidal tendencies and would be willing to pay for that extra bedroom.
- The income bands are set too high. Someone earning £30K can easily rent a one bed house in the private sector
- Your threshold earnings are far too generous. They should be set lower. For instance I have people renting one bed houses at £400 to £475 per month. This is good enough to pay a mortgage a £30,000 income threshold is too generous and allows too many well paid to compete for a limited resource when they should be in the first time buyers market.
- The new proposals seem sensible and solve some of the issues previous policies have not addressed. I assume that the current allocations policy for affordable housing with priority to people in that particular parish getting priority will be continued.
- Ethnic Brits should have priority over immigrants who have not been UK residents, working and making a contribution, for less than 5 years.
- If the older person's accommodation is difficult to let why would there be restrictions on the older people accessing the housing register, surely you would need as many older people on the register so that the difficult to let properties are filled quicker.
- I would like to see a bit more help for people like me and my family when it comes to anti social tenants. We moved through the choice based lettings scheme, to get away from such people, only to be told that one of those families is to put on the village where we have moved to. Nobody cares about the situation that we are being placed in. We have been very happy where we now live, but when this family are moved in, we are going to go back to being miserable again, and my

children not being able to walk down the street in peace, having to put up with verbal abuse, and more.

- I believe for sheltered /supported housing the age should go back to 60 years. I know of schemes where 55 is allowed now, the people in them still work and do not even have supported calls so surely do not need this type of home. This age group also do not mix in with the community as once they come home they just close the door on the outside world.
- I am concerned that this is just about reducing the number of people of the housing register regardless of the detrimental effect on members of our community who apply for social housing. Statistics should not come before the benefit of the community and the individuals within it. I am also concerned that this will increase void periods of many social rented properties.
- It would be interesting to know the reasons for the proposed changes to the Allocations Policy. These should be published alongside the consultation document.
- Get rid of the bad tenants have a zero tolerance policy and stop being so liberal its very nice in Grimsby send all the criminals, druggies and low life up there. Stop allocating traveller sites to gypsies that no longer travel rehuses them in Bedford town centre.
- I am particularly concerned about older and more vulnerable people accessing social housing, and also the impact of bedroom tax leaving our housing association at least with a complete imbalance of 2 and 3 bed houses. I believe the current policy works fine and should be left as it is.
- Stay with the original 4 banding process. I agree homeowners should be excluded unless they are being repossessed or due to the home no longer being suitable due to deterioration in health. I think anybody with ASB in the past or present should be excluded from joining the register as I don't think it is fair to other council tenants who pay their rent on time and are peaceful tenants to have to put up with problems neighbours. I think if anybody has any type of housing debt they should be excluded from the register until all the debt has been cleared.
- I would like to see priority for housing being given to citizens who are British and have lived in this country, and worked in this country for a period of 10 yrs. I am very concerned about the amount of people from EU countries who are being given new properties above UK citizens who have lived here for a long time. I constantly see Polish and Eastern European Citizens getting brand new houses and flats in my area and we are really sick of this. There will be social unrest in this country if this carry's on. Would we be given new flats and houses if we went to their country? I think not. They are very nice people however;

they should not be able to jump the queue for housing above British people....

- Your basic problem is that there aren't enough houses, particularly not for people needing social housing. You should only give planning permission for new developments if at least one third of the properties are available for rent by people in housing need. Your current proposals are merely shifting the deckchairs on the Titanic.
- I am concerned over the older people section. I do not feel that Extra Sheltered should be the only new build for this section. I believe bungalows should be increased in the whole of Bedfordshire. I also believe all Retirement people should be able to apply for two bedroom properties especially bungalows. Bungalows in this area generally small and virtually impossible to have guests. In this day and age when we actively encourage inclusion and with families not staying in the same area we should help people to not feel isolated. I hope if a working person over 50 would not take priority over a retired person wanting to down size to a bungalow? How would a retired person stand if living in their own property but requiring a level access property due to health needs? I really feel that Bedfordshire should be looking at the housing stock and allocations more thoroughly for the increased elderly population due in the coming years and not just Extra Care as I state above.
- I have been on the list for 3 and a half years, living in 3 rental properties in this period with my 2 daughters aged 11 & 6. I work part time; I pay my bills & have a good credit history. I have always impressed these points when bidding on the system. As far as I can tell, the new proposals will actually benefit me. I am fully aware of people in other positions being advised to quit their jobs, claim every benefit they can to enable them to further their applications, & actually being rewarded with a council property. I do not see how this is fair, unfortunately it is the system, People should be encouraged to earn their own money & pay their way in society, set an example to their children. Work should reward, not benefits.
- Please make sure that 50+ tenants are treated fairly and able to bid on properties even though they may not be working.
- This survey looks like the council want to make political ideological changes hidden behind a poor economical climate as an excuse.
- I see this council discriminates against people still, just like they have my dad , and where is he now been homeless for nearly a year and he works in your area , have left him out to freeze still when he is ill, what a disgrace , we would like to know where he is as we haven't heard from him since he contacted you in Feb or March and told us you wouldn't help him such a disgrace of a council

- Do married couples get more priority than none married?
- I think all the proposed changes to the housing register would be fair to all good applicants.
- I do feel that the overcrowding does need to be addressed a little bit more, my own personal circumstances are that we live in a 2 up 2 down property with one bathroom and 6 people living here, 2 adults, 3 girls (21) (7) & (5 1/2) they all share the same small bedroom then our 4 year old son shares with us this has enormous problems and does have an effect on family life, we have been on the register since June 2011 and nothing There always seems to be loads more people with more needs as we currently only have 2 needs so hopefully this may make a difference (hoping)
- I am not expecting anything you read from this exercise will have any affect on the conclusions you give us.
- I agree with most of this..... but there are people who might need to move due to circumstances. and might need to go on the bidding system, as some people are on the exchange list and not getting anywhere as the exchange website are not going anywhere fast and bidding might be the only way they can move.
- Consider that not just the elderly need bungalows for accommodation. Some applicants are wheelchair bound and are not being offered properties of the right specification because they are not the age specified. Disabled people should be assessed for their housing need and taken into consideration for over 50 and 55 properties if these fulfil their needs. Adapting a general property for disabled person requirements may end up costing central Bedfordshire council and social services more money in the long run than offering them suitable accommodation that is already adapted.
- The introduction of Housing Transfers should be reintroduced. Instead of working purely on points the Council needs to work on common sense needs as well.... we have a three bedroom property in Letchworth and a one bedroom property in Potton, we only want a two bedroom property but common sense does not prevail when different authorities will NOT work together creating homes that are needed and allowing those wishing to marry to downsize.
- I am a single parent of two children and would like to live closer to help an elderly relative. I work and rent privately as I wanted to show my kids a good work ethic but this does not help much as we live in heat poverty and my daughter has cried as their has not been much food in the cupboard. I am disadvantaged because I work and rent privately.
- Elderly in privately owned properties who wish to downsize (due to death of one of the parties or ill health) SHOULD BE ALLOWED (AT A COST TO THE COUNCIL OF 10% OF THE SELLING PRICE OF

THEIR OLD HOME) to go on a housing list AND be marked as priority as this would allow a family to move into their old home. Too many unmarried mothers are given priorities. There are too many elderly homes being pulled down to make way for unmarried mothers in Biggleswade. Where can the elderly go now, not many vacancies elsewhere AND WHY SHOULD WE MOVE OUT OF THE AREA WE

- I personally feel this Housing Allocations Policy needs more work on the impact assessment of the different circumstances of people and families. One instinctively feels it will penalise some families who should not be penalised and may lead to more money being spent by CBC through needing to provide other council services. HAVE LIVED IN ALL OUR LIVES??
- No mention of allowing very local e.g. village ties to provide some priority in allocation. I would like to see more housing available on a very local basis to people who have lived a long time in a particular location. Village exception schemes are NOT enough.
- I am very concerned about the next generation not being able to live in their 'home town/village' because they would not be eligible. I welcome the proposed opportunity you are giving to people in that situation to be able to put their names on a list. I also wonder if some sort of 'start up' scheme could be introduced so that young people starting out can have accommodation with very cheap rent for the first 5 years to enable them to save up and get off the social housing requirement (freeing up space for the next person). Perhaps you could also consider a scheme where two young people could apply for a two bedroom start up so that two friends (or siblings?) could share the cost. I would also like to point out that under the 'Statutorily overcrowded' definition, people can still get to the top of the list simply by having babies. This system needs to be improved - those who wish to increase the size of their family should be able to put themselves down on a list for a bigger property (and be considered under 'level 2' not 'level 1' in terms of priority) and then - once they have the room - have more children. The council should allow people to do this by having a way for them to state they wish to have another child and therefore would like to have a bigger property if it becomes available. If one does not become available, they should have to put up with being 'overcrowded' or delay having another baby until they have the room.
- I think people who have lived in this country for more than ten years who are over 50 should be.
- Please give maximum priority to people who live the closest/ have grown up and have family there and need their own place. Also be more understanding of people with mental health problems such as depression, social anxiety and Obsessive Compulsive disorders.
Thanks.

- I feel it was right when I was issued it was not easy and is still hard work now I feel that the issues surrounding moving or getting a property after a year or two that is more suited to your needs has really let CBC down and has made me loose money and has made you lose money I feel it has been a waste of two years that was vey wrong. But at the same time there are very few properties in this area that do meet these other needs.
- I think the policy should have stayed as it was and be able to have as much rights as anybody else even if you live out of the border.as I have already explained some of the areas for central beds are only up the road from where I live.
- People apply like myself as they have no other option and cannot buy a property and are struggling paying high private rents. We are on reasonable pay, but have been declined a mortgage due to not enough deposit, poor credit rating and the amount of outgoings i.e. Loans, car payments & Child Support Agency (Crippling amounts), solicitor fees (divorce). We are struggling to live day to day after paying the outgoings and the extortionate private rent that we have to pay. But we have to pay it as we work in the area and our family are here. We have no holidays, don't go out and yet we could afford to pay a housing associations rent where as people on benefits are living rent free and have holidays etc.
- This policy should not just give priority to Central Bedfordshire residents, but should be refined to favour those in the immediate area where they live, work or have supported family. We are concerned that the policy directs elderly people to access information about available properties via the internet. Many elderly people do not have access to computers or have support networks to assist them to do so. Elderly applicants should be notified in hard format of any available properties fitting their requirements, or additionally an 'auto-bid' system should be set up so that once an elderly person has registered their need and type of property required, the system automatically 'bids' on the behalf, removing both the need for that elderly person to access the internet each time and the delay in response time this would invoke.
- There is a lack of housing and the main reason for this is immigration. 10% of all our housing stock has gone to immigrants and this is not fair. Immigrants should be placed in band 4 no matter what their circumstances. Once they have been here for 10yrs and worked full time during this period then they should be allowed to go into band 3 or even 2..... British people that have been born here and paid into the system are being treated unfairly. British people should go into band 1.... We are the ones that have lived here all our lives, our parents have lived here and our grand parents, we go back generations... example: if a single person who was born in Britain is currently living in a bedsit or with parents, that person will automatically go into band 4.... If an immigrant man comes here with his wife and 4 children and has

no where to live, the first thing the council does is to put this family into emergency accommodation. The immigrant family automatically become a priority and go into band 2 or even band 1.... the whole system is unfair, British people are being penalised while immigrants are given flats/houses... why doesn't central beds council put British people first instead of bending over backwards to help immigrants all the time.... British people that were born in Bedfordshire feel like second class citizens because of the way we are treated when it comes to social housing !.... no wonder there is so much animosity towards immigrants!

- I believe the proposed changes to be good and much fairer to people. I currently am on a lower wage and my husband and I, whom is a fire-fighter, pay a high rent to a private landlord and constantly struggle, month to month. I hope and want the new proposed changes to help people like us who work hard, enjoy our jobs but don't earn a great deal off the back of it.
- I think that this Allocations Policy is a step in the right direction and allows for those who genuinely have a housing need to bid and it will also help make many areas safer.
- On behalf of the members of the Sheltered Action Group, we do not agree with the current age limit for Sheltered Properties 55+. Once the review of the Sheltered Schemes has completed, any remaining Sheltered Schemes should have the age limit increased to 60+. Any remaining Schemes could they be used for 50+ housing as there is a huge shortage in suitable properties for that age group. Allowing people 55+ to move into Sheltered Accommodation drastically changes the ambience of the Scheme and seriously affects the 'Community spirit and involvement' 55+ do not wish to mix with older residents some of whom are well into the 80s and 90s.
- Having read the Policy Document I consider that you have taken account of most of the situation that can arise in the allocation of Council properties, however there need to be a system in place that can check the a person assets are within the figure you have stated, this then looks like a means test would be needed and would people perhaps not be willing to go along this part. If they did not want to be means tested you could not allow them to be considered for allocation of a property.
- I am nearly 37 years old and have been ill with Chronic Fatigue Syndrome, and unable to work for the last 16 years. As a result, I am still living with parents, but my father is 37 and will not be able to look after me for much longer, so I need to find somewhere of my own. My father has recently gone round old people's homes on my behalf, to ask if they would take me at 40 years old, but they only admit people aged over 55 or 60 years old. He has also phoned social services on my behalf to ask what accommodation they provide for people in my

situation, basically nothing. They said that I should contact you. I have some savings, but not enough to buy out right and would not qualify for a mortgage as I am on benefits. My parents live in an isolated village with an infrequent bus service and no shop, post office, bank doctors or dentist. I would struggle to survive if anything happened to them, as I find it difficult to get out with help and would find it almost impossible to get out and do anything on my own. Please tell me where I am supposed to live? How can I survive if no one is prepared to help me? Where do I go from here?

- Agree on the whole with the new changes, but simpler does not always mean less frustrating for customers. If customers are not in the urgent need band, then this could cause more resentment and customers trying to increase their band no matter what. I have tenants in my job already that put pressure on their social worker to get them an urgent band, when they do not need it. I think the amount of bands we have is ok, just need the fine tuning of the current changes.
- With the rapidly growing number of OLDER people, who live in small towns and Villages wanting to down size, they should be considered for a special category of OLDER PERSONS AFFORDABLE Needs. Pregnant teenagers should be refused any housing and only qualify for Social support. They should be encouraged to stay with their parents... Live alone pensioners, War pensioners and disabled should be helped to downsize within their Local Community, where family support and friends are already available...thus less strain on CBC adult services and making it easier to 'Live in the community with established friends / family' Planning permission should be REFUSED for developers and others buying village bungalows and the like and instantly extending and developing them into a 4/ 5 bed high profit units, depriving the village of an asset for locals. The 80 units available at PRIORY VIEW, the new occupants who vacate their present accommodation, that accommodation should be offered to local OLDER PERSONS, rather than developers and get rich quick sharks.
- For decades many have argued yet been ignored as 'racist' by the establishment that immigration causes/creates and makes worse the housing situation for this over crowded country, especially social housing for the low paid indigenous population. I believe all social housing should be for the indigenous i.e. English population only!
- My medical condition which is emphysema which will never improve. Living in my lorry Monday - Friday is not helping my medical condition. I have been divorced for 12 years and have two sons aged 15 - 13 the youngest one is disabled and has severe learning difficulties. I have fortnightly access to my children, but I have no accommodation in which to take them. For the past 5 years I rented privately in Leighton Buzzard, but due to rent increases and utility increases I gave up my flat so as not to incur a large debt. I was born in Leighton Buzzard and lived there for 47 of my 49 years. I have worked for an Eaton Bray

Haulage Company for over 25 years. All that I was offered from Central Bedfordshire was a Band D

- We have been on the list for 15 yrs and have been offered two properties and taken away through the amount of savings we had. We are both disabled and have medical problems, and registered disabled.

This section below only responds to comments not covered under questions 1-9. Where comments relate to the consultation questions, they are covered within that subject heading.

The development of the new Allocations Policy has taken considerable time; this was to ensure that the new Policy is a robust and detailed document that meets the housing needs of Central Bedfordshire's residents. It was critical that the views of applicants, tenants and stakeholders informed the development of the Policy. Engagement has underpinned the development of the Policy.

The key objectives of the draft Allocations Policy are to:

- ***Help applicants in housing need to find suitable housing.***
- ***Provide housing applicants in Central Bedfordshire with a fair and transparent system.***
- ***Provide an incentive for applicants to seek employment.***
- ***Create a simpler system.***
- ***Make efficient and best use of social housing stock in the area.***
- ***Encourage applicants to take a measured and long-term view on housing options and to take responsibility for planning their own housing provision.***

More specifically the policy seeks to achieve the following outcomes:

- ***Encouraging applicants who are out of work to seek employment.***
- ***Balancing reasonable preference with local priorities.***
- ***Providing support for low paid workers in the private sector.***
- ***Practical help for those threatened with homelessness.***
- ***Supporting households who work locally.***
- ***Offering choice.***

Some homes in rural areas will be subject to a rural exceptions agreement, which means that these homes will be let in a different way. This is outlined in appendix 1 of the Allocations Policy.

The Policy proposes to have a separate Older Person's Housing Register for applicants over the age of 50 who wish to apply for sheltered accommodation for older people and designated older persons accommodation. Vacancies that fall within this category will only be open to this group of applicants. Older people wishing to apply for general needs vacancies or older persons designated bungalows who are in housing need may also apply for accommodation through the General Needs Housing Register.

In order to ensure that all social housing, including low demand properties, are let in a timely manner an Available Now window will be introduced. These properties will be made available to individuals who are not on the housing register.

The Banding scheme has been designed assist households impacted by the bedroom subsidy rules by giving priority to those tenants who need to transfer because they cannot afford to remain in their current accommodation.

Central Bedfordshire Council continues to work with key partners to develop units of affordable housing.

The policy does not differentiate between married and unmarried couples.

A full equality impact assessment has been undertaken to ensure that no groups are prejudiced as result of the new policy. This document is available upon request.

Support is available for vulnerable households and other households unable to access ICT. Support will be given with both the application process and bidding. There will also be an auto bid function which will place bids on available properties that match the applicant's requirements at the beginning of each bid cycle. Auto-bidding is available to applicants who are unable to access any methods of bidding and do not have a representative who can place bids on their behalf.

Further response received from Clophill Parish Council is documented below:

Housing Allocations Scheme - Response to Central Bedfordshire Council's Consultation Draft

1. Introduction

- 1a.** This paper is the response by Clophill Parish Council to Central Bedfordshire Council's Consultation Draft for its Housing Allocations Scheme.

2. General

- 2a.** Clophill Parish Council considers that the draft for the Housing Allocations Scheme is, within the constraints of its permitted legal framework, a

sensible and caring proposal. It addresses well the many varied and difficult issues and Clophill Parish Council congratulates the authors.

- 2b.** Clophill Parish Council has two concerns, described below. However, it appreciates that they are most concerned with the practical application of the Scheme, rather than in the wording of the Draft. However, these concerns are addressed below, with the hope that the draft might be strengthened to meet these concerns.

3. Concerns

- 3a.** Clophill is a Conservation Village with a tight Settlement Envelope. Land within this envelope is sold at very high prices. As a consequence, developers seek approval only for expensive, executive homes. Over time, the village is losing its historic, valuable mix of residents. The Parish Council owns no more land within the envelope which it can sell to potential developers of affordable housing at required low prices. Even when legally required to provide a percentage of affordable housing, a developer was recently able, legally, to "buy-off" this requirement with CBC. Clophill Parish Council would like to see the need for affordable housing to be emphasised in the Scheme. However, it is appreciated that this might not be possible within the restrictions of this consultation.
- 3b.** "Trading Down". Several years ago when new, affordable houses were available in Clophill and, exceptionally, reserved for Clophill residents and those with links, a widow who had occupied a three-bedroomed council-linked house was not allowed to trade down to a two bedroomed house, despite yielding a three-bedroomed dwelling. She has since left the district. The Parish Council notes that the Consultation permits such "trading down", but suggests that this should be given more emphasis as this will produce more needed dwellings and be more energy-efficient.

4. Suggestion.

- 4a.** The Parish Council suggests that future developments contain a higher proportion of two-bedroomed dwellings over single-bedroomed dwellings. It is suggested that two-bedroomed dwellings are more flexible and more useful for both occupants and for CBC. The predominance of elderly occupants frequently leads to the need for relatives or, in more severe cases, carers produces situations where existing occupants require rehousing. CBC will also benefit from the additional flexibility of being able to allocate the dwellings to a wider range of applicants. However, it is again appreciated that this suggestion may be outside the terms of reference of the Consultation.

Whilst this suggestion is outside of the remit of the development of the Allocations Policy, it is noted.

5. Conclusion

5a. Clophill Parish Council welcomes and supports the proposals of this Consultation. It congratulates those responsible on its content and proposals. The Parish Council appreciates that its concerns and suggestion may be outside the immediate terms of reference. However, if this is the case, it hopes that more emphasis on the points made be added to the Scheme when finally issued.

Clophill Parish Council

28th January, 2014

Further response received from a parish councillor is documented below:

Housing Allocations Scheme – Response to Consultation

It is felt that the formulation of this Policy should give consideration to older / retired people who live in rural areas, the opportunity to downsize from their current council property which may now be too large for them, to move to a smaller property but in the same locality.

It is here where they will have a group of friends and possibly family who can assist them in their needs on a day to day basis if required. This will take some of the burden off the Social Care requirements for the council in the early years of retirement.

However to make this happen the Council will need to make persons aware of the chance to downsize and the application system simple. Many older people who have never touched a computer can easily be put off applying because of this type of application process.

The need to provide a range of alternative methods of applying for housing for some client groups has been picked up by the EIA. The main alternative way will be by phone, or if required home visit.

The idea of enabling older people to stay within their locality as they move is an interesting concept and the council will explore opportunities for doing this. One such way is to introduce a locality priority for older people, giving those that already live near to a vacancy priority for that vacancy, over others who live further afield. This concept will be explored as par of the policy development process.

Qualitative Feedback and Recommendations from Staff.

Work as a Basis for Housing Allocation.

This is the central theme of the new policy and it is recognised that Members want to reward people in work with additional priority for housing. The policy also makes it clear that it is intended to support people into work. However as the policy stands it will actually exclude many people looking for work from being on the register. They will only be able to register once they have work. This seems counter intuitive as an incentive to work as the applicant has the potential reward of housing only if they actually working and not be rewarded for seeking work.

This approach does not therefore recognise that many people e.g. those that have lost jobs, find it difficult getting work because of their protected characteristics (e.g. BME and disabled applicants) or those just unable to secure work due to poor skills or qualifications, despite their trying are overlooked.

One way to be more equitable is to allow people onto the register if they are actively seeking work and can demonstrate their activity by reference to Job Centre Plus. Where people comply with their JSA conditions e.g. completing their work search activities, attending appointments with advisers or training sessions they should be included on the register. If on the other hand they have been sanctioned by the DWP or have lost their job through being sacked they should not be allowed on the register.

The absence of supporting the genuine aspiration of people on full housing benefit and adequately housed in the private rented sector could be challenged as discriminatory at worst (should they be a disadvantaged group) or at least seen to condemn people with little income to a poverty trap.

In addition the policy awards people who have found their own solution to housing through the private sector but then makes it difficult for them should they subsequently lose their employment. The policy then suggests that an assessment of their likelihood of getting back into work is made. This will entail best guesses or arbitrariness in deciding what chance these people have of regaining employment. This makes the policy seem a very hard one as it will not support people who have fallen on hard times.

The policy tries to address the issue of hardship. In doing so it suggests that if you are working it is not acceptable to have to suffer financial hardship but if you are not in work this hardship is somehow acceptable. Within the private rented sector people who are unemployed may suffer more hardship than

people working. I would expect that people working to pay their rent can afford to do so – should they not then they will either seek alternative solutions or approach the Council as homeless (where they will either be accepted or not). I would also imagine that people working feel they are better off working than if they were not. Without an assessment of this we are guessing people's circumstances.

It is interesting to note that currently we house lots of people from private sector lets. These will often be working and in band 3. If we think people should be removed from the private sector into social housing because we believe rents are too high for working households why are we supporting it for homeless households (and who may well be workers)?

Hardship applies to working households and unemployed households alike. If we look to support households suffering hardship this should be applied to all applicants in a clear and understandable test based upon income and expenditure as notional rents do not tell the whole story. Having said this, this would create more administration and will be subject to challenges.

Recommendations:

- **allow anybody onto the register who can demonstrate that they are working or actively seeking work that are not subject to DWP sanctions or have lost work through their own fault**

or

- **exclude all adequately housed households in the private rented sector on the basis that they are adequately housed**

This latter option fits in with the Council's support for using the private rented sector to house homeless households as discharge of duty

Households not in employment will be given advice and support to access employment. The housing options team will work closely with partner agencies to ensure that targeted advice is given to households in housing need wishing to access employment.

In the National Housing Strategy published Autumn 2011, the government recommended local authorities to consider giving additional priority for social housing to working households. The Policy aims to support working households and to support wider corporate priorities in terms of the growth of the economy and sustaining employment.

The Council wishes to support low paid workers who are struggling to make ends meet in the private rented sector. A low income is defined as an income less than £24,000 per annum.

The Policy will not discriminate against households who are unable to work due to medical reasons. Those in receipt of DLA because they are unable to work will receive same priority as working households. It

would be difficult in practice to verify if an applicant was actively seeking work, or that they have not lost employment through their own fault. To ensure the Allocations Policy remains simple and transparent it is considered appropriate that households in the privately rented sector who are working are able to join the register, whilst those who are not working cannot join.

The Council will review the policy after it has been in operation for a period of six months. This will be an area that will be reviewed and the impact assessed.

Forming Households and Removal of Bands 3 and 4

Is there a distinction between non working and working forming households living with friends and relatives? What if they are adequately housed – we have doubts as to whether they should be on the register as they could make their way via the private rented sector as a means to get on the register.

If the policy is seeking to reduce the amount of people on the register the inclusion of forming households and working households in the private sector will allow lots of people into band 2. This will make band 2 large and with the demise of multiple needs in band 3 and band 4 itself will lead to many cases of allocation being decided by officers.

There is an argument for putting some applicants in a new lower band i.e. households at home and adequately housed working households (and those seeking work – notwithstanding the recommendation above about working households). This would recognise them within the scheme but also does not accord them the same priority as other groups.

We support the removal of composite banding but having only two bands makes it too narrow a field and lumps most people in together creating virtually a waiting list and not a register based primarily on housing need. This will also give some distinction between those in housing Reasonable Preference Categories and those as local priority groups.

Recommendations:

If we accept forming households and adequately housed working households in the private rented sector put them in a new band below the proposed band 2.

Noted – the notion of forming households having priority has been removed from the policy after discussions with staff groups of the policy has been taken out after consultation feedback

Available Now Window

The intent behind this suggestion is clear in that should properties not be bid for they need to be let quickly. There is no question that delays to letting need to be minimised. However it is our view that the mechanism as proposed poses operational difficulties and is a roundabout way to house those not in housing need. Having done away with band 4 and part of band 3 this seems counter productive as we will once again be encouraged people to approach the Council for housing even if the chances are low.

If we have a register on the basis that we accept it is those on it that have housing need (or other special reason i.e. local priority groups) then we should be seeking to ensure that these people are being housed. Therefore we think that the Available Now idea is extended beyond the homeless households' pool to include all existing applicants. Therefore should there be any properties left unbid for after advertising, we make direct offers to people who have not bid for them in accordance with their needs. This approach will ensure that those in need are either being housed (the purpose of the register) or they are down banded or removed from the register should they refuse the offer. This will help impose a discipline upon those on the register to bid and reduce properties going to those without a recognised need.

This approach will also be easier to administer. We are concerned that to enable the proposed Available Now approach will require some form of registering people outside of the main policy to bid on properties when they become available. To enable this will require administration both in terms of setting them up but also in terms of selecting and verifying bidders. If we are of the view that we do not want to band applicants that are currently in band 3 or 4 then having the Available Now window is affectively a return to this by another route.

We have recently undertaken reviews of band 1 and band 2 applicants who have not been bidding. This has shown that many applicants are just inactive on the register waiting until such time they believe something they really want crops up. We believe this is not what the register should be about and that it needs more active management. The ability to make direct offers after bidding rounds will enable this intervention to take place and is administratively easier and quicker. The end result is the same i.e. that 'hard to let' properties are let but with the advantage it is to people in need.

Recommendation:

Change the Available Now approach from being only applicable to homeless households and then open to public 'non register bidding' to one that will be based upon direct lets to non bidders on the register.

Noted - we have worked with staff to make this part of the policy much clearer and together we have developed a good process for capturing applicants data so it can be used in the available now window. The new policy sets this out.

Banding of workers and non workers

The policy says that all workers in each respective band will be shortlisted above all non workers in each respective band. This in effect gives rise to four bands as follows:

- Band 1 (workers)
- Band 1A (non workers) could be called band 2
- Band 2 (workers) could be called band 3
- Band 2A (non workers) could be called band 4

Notwithstanding previous recommendations should the scheme proceed on the basis of prioritising workers over non-workers, in terms of administering the scheme it will be easier technically to denote each group as a separate band to aid the short listing process. It will also be easier for applicants to understand the process.

Although there will still be four numbered bands the register will be quite different from the existing one in that some adequately housed groups e.g. non workers and tenants will be excluded and composite needs will also have disappeared.

By having four distinct bands the appearance of a waiting list is also reduced and idea that different needs have greater priority is recognised easier.

Recommendation: Split the proposed two bands into four bands to enable clear distinction between workers and non-workers.

This proposal would not have an impact upon who is successful in getting a property, and in order to ensure a simple and transparent Policy the Council feels that a two band system meets its objectives, and the needs of applicants.

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The Public Sector Equality Duty

The Equality Duty requires public bodies to have **due regard** to the need to:

- Eliminate unlawful discrimination harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

Protected Characteristics:

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Marriage and Civil Partnership (elimination of discrimination only)
- Race
- Religion or Belief
- Sex
- Sexual Orientation

Due Regard means consciously thinking about the three aims of the Duty as part of the process of decision-making. For example:

- How they act as employers
- How they develop, evaluate and review policy
- How they design, deliver and evaluate services
- How they commission and procure from others

Advancing equality of opportunity involves considering the need to:

- Remove or minimise disadvantages suffered by people because of their protected characteristics
- Meet the needs of people with protected characteristics
- Encourage people with protected characteristics to participate in public life or in other activities where their participation is low

Fostering good relations involves tackling prejudice and promoting understanding between people who share a protected characteristic and others.

Complying with the Equality Duty may involve treating some people better than others, as far as this is allowed in discrimination law. This could mean making use of an exception or positive action provisions in order to provide a service in a way that is appropriate for people who share a protected characteristic.

Officers should:

Keep an adequate record showing that the equality duties and relevant questions have been actively considered.

Be rigorous in both inquiring and reporting to members the outcome of the assessment and the legal duties.



Final approval of a proposal, can only happen after the completion of an equality impact assessment. It is unlawful to adopt a proposal contingent on an equality impact assessment

Title of the Assessment:	Housing Allocations Scheme	Date of Assessment:	18/06/13 28/10/13 24/02/14 08/04/14
Responsible Officer	Name: Tony Keaveney	Extension Number:	75210
	Title: Assistant Director Housing Services		
	Email: Tony.Keaveney@Centralbedfordshire.gov.uk		

Stage 1 - Setting out the nature of the proposal and potential outcomes.

Stage 1 – Aims and Objectives	GUIDE
<p>1.1 What are the objectives of the proposal under consideration?</p> <p>The scheme describes the criteria that Central Bedfordshire Council uses to prioritise applications for housing in Council homes, homes owned by Aragon Housing Association and homes owned by Registered Providers (RPs) and let through nomination agreements with the Council.</p> <p>The Council has divided its Housing Register into two main sections, to reflect how lettings will be made. These are:</p> <ul style="list-style-type: none"> • General Needs Housing Register • Older Persons Housing Register <p>The Allocations Scheme sets out the eligibility criteria for each part of the Housing Register and the criteria used for advertising and letting within these.</p> <p>The Allocations Scheme describes how the Council prioritizes housing applicants to ensure that those with housing need, as described by the legal definition of “Reasonable Preference” are given access to the majority of available social housing lets. This Allocations Scheme sets out in detail who is and who is not eligible to become a member of the Housing Register and how this assessment is made. It sets out how applicants can apply for housing, how they are assessed and what service standards an applicant can expect to receive.</p> <p>The key objectives of this Allocations Scheme are to:</p> <ul style="list-style-type: none"> • Help applicants in housing need to find suitable housing, • Provide housing applicants in Central Bedfordshire with a fair and transparent system • Provide an incentive for applicants to seek employment • To create a simpler system that closes any loopholes or ability for applicants to chase additional priority, • Make efficient and best use of social housing stock in the area,, • To encourage applicants to take a measured and long term view on housing options and to take responsibility for planning their own housing provision. 	
<p>1.2 Why is this being done?</p> <p>The Housing Act 1996 (as amended), requires Local Authorities to provide ‘Reasonable Preference’ in their Allocation Scheme to people with high levels of assessed housing need. The Localism Act 2011 allows significant control over who qualifies for housing and the priority given to national and locally determined groups that are assessed as being in housing need. These flexibilities are now reflected in the policy.</p> <p>The Council is faced with a substantial demand for social housing, and an insufficient supply to meet the demand within Central Bedfordshire.</p>	



1.3 What will be the impact on staff or customers?

1) Section 1 of the Housing Register is for all general needs applicants.

Normally, anyone can join the housing register so long as they:

- Over the age of 16 years – conditions apply, see below
- Are in housing need
- Have **lived in the area continuously for the last 3 years OR have worked in the area for the last 6 months**
- Are not guilty of poor behaviour
- Do not owe debt to the Council or to a Registered Provider
- Have poor tenancy history ie non compliance with a previous tenancy agreement
- Do not have a household income of more than £40k per annum (before tax).
- Are not a home-owner

The law requires that **reasonable preference** is given to the following categories:

- People who are homeless, including those who are intentionally homeless and not in priority need
- People who are owed a re-housing duty under the homelessness legislation, where this duty has not been discharged by an offer of private sector accommodation
- People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
- People who need to move on medical or welfare grounds, including grounds related to a disability
- People who need to move to a particular locality, where failure to meet that need would cause hardship to themselves or to others

In this Allocations Scheme, all of these categories are equal – if an applicant falls into any of the categories, he or she will be admitted to the Housing Register. The categories all have equal standing – having housing circumstances that cover more than one of those categories does not warrant additional priority.

Encouraging housing applicants that are out of work, to seek work is a key aim of this Allocations Scheme. To facilitate this, **applicants who are working will be given priority for vacancies** above applicants who are not working. Applicants who are not in work, will be given advice and practical assistance in finding work from the housing options team and by other key agencies in order to give them better prospects of re-housing via the Housing Register

If the applicant's employment status changes they may be allowed to retain the priority as long as there is a realistic prospect of re-employment. The decision will take into account their previous employment history, age of the applicant and other relevant factors. However they must have been in employment for at least 16 hours a week for 3 months at the time of the offer of accommodation. [Following consultation this aspect of the policy has been revised. If an applicant's employment status changes they will be reassessed and their prospects for re-employment will not be taken into account.](#)

Where an applicant is self employed, they must provide proof of their self employment status and still satisfy the criteria at the point of offer. This must be evidenced through documented tax returns.

Applicants who are in training or who are volunteering will not attract the employment priority. [Following consultation this aspect of the policy has been revised and volunteering will now count as employment.](#)

Connection due to employment

Where an applicant wishes to move to the CBC area because of employment, they will be included on the Housing Register. This includes two types of applicant:

- Where they already have a job in the CBC area
- Where they have an offer of a job in the CBC area and need to relocate in order to take up that



offer

The following conditions apply:

- The employment must be permanent employment and not a temporary fixed term contract. Short term or agency work does not qualify for inclusion
- The employment must be for a minimum of 16 hours a week
- Applicants may be self-employed with their business base in Central Bedfordshire.

People earning a high salary or significant assets

Applicants will not be entitled to join the housing register where the household income is greater than £20k per annum [for a single person and based on a sliding scale for families](#). This figure, set as of 31st March 2013, will be increased annually by the rate of RPI. If the income threshold is exceeded following application to the Housing Register, the application will be cancelled

Deliberately worsening circumstances to gain extra priority

Although relatively uncommon, it is appreciated that some people deliberately make their housing circumstances worse to give themselves an advantage over others. Examples include moving into accommodation that is unsuitable on health grounds and then applying for a medical priority, or moving others into their home to receive an overcrowding priority. Appreciating the inequity of this to the many others who ask to be assessed in line with the policy and who are simply waiting their turn, the Council takes this very seriously.

Those who engineer their own circumstances so as to get an extra advantage over others will be penalised by the Council removing their application from the housing register for a period of 12 months and then reassessing the application on genuine circumstances upon reapplication

2) Section 2 of the Housing Register is for applicants over the age of 50 years who wish to apply for supported housing for older people. This includes sheltered housing and extra care accommodation, including shared ownership properties. Vacancies that fall within this category will only be open to this group of applicants.

Older people wishing to apply for general needs vacancies (flats) or older persons designated bungalows, who are in housing need may also apply for accommodation through the General Needs Housing Register.

Sheltered housing - There are no eligibility restrictions for this type of accommodation as there is a reasonable amount of supply of housing.

Extra Care Schemes - Extra care schemes are very popular and attract a high number of applicants. Therefore the same eligibility criteria applies as for the general needs housing register.

The Banding Scheme applies to all housing register applicants– General Needs Applicants and Sheltered Accommodation Applicants.

Applicants who apply to join the Housing Register will have their housing need assessed, and will be given a priority band if sufficient housing need exists. Where an applicant has no housing need, they will not be registered. Bands are the Council's way of making sure that homes go to people most in need. The bands take into account the people the Council has to give preference to by law and those people considered to attract additional preference for housing by the Council.

The Allocations Policy contains 2 bands.

Band 1 – Emergency Need to Move. Reasonable Preference plus Urgent Priority

- Armed Service Personnel with urgent housing need



- Emergency medical or disability
- Release of adapted property
- Under-occupation
- Statutorily overcrowded
- Private sector property that is in a seriously defective condition likely to significantly impact upon the health and/or safety of an occupant.
- Decant of Council Tenants where demolition is approved
- Urgent management move - facing a life threatening situation

Band 2 – Reasonable Preference

- Armed Service Personnel
- Homeless households owed a duty by CBC
- Overcrowded households
- Medical grounds
- Living in unsatisfactory housing lacking basic facilities
- Hardship / welfare / exceptional need to move for care or support or housing need due to age
- People who need to move to avoid hardship - includes low paid workers who live in the private rented sector, who struggle to make ends meet and as a result experience hardship.
- Ready to move on from supported housing scheme

Applicants in Band 1 will be shortlisted above applicants in Band 2. Working applicants in each band will be shortlisted above non working applicants. Where two or more applicants bid on a vacant property and have equal priority, preference will be given to the applicant who has the earliest effective date of application. Where two or more applicants with exactly the same level of priority and effective date on the scheme bid for the same property, a senior officer will make the allocation based on best use of the housing stock and needs of the applicants. A record of how the decision was reached will be kept for the purposes of a robust audit trail

The Council or RP will contact applicants who have been shortlisted for an offer of tenancy. It is the applicant's responsibility to ensure that all contact details are up to date and that they respond within 24 hours to any contact made by the Council. If an applicant does not return contact they will be overlooked for the offer.

An applicant may only include **immediate family** on their application for housing. Immediate family includes:-

- The applicant
- Spouse or partner, including same sex partners. A partner must be established for 12 months before being accepted as a joint application. [Following consultation this aspect of the policy has been removed.](#)
- The applicants children or partner's child(ren), if they are aged under 21 and live with the applicant all the time, or for four or more nights every week. Applicants will be required to provide the Council with formal (Court Order) documentation relating to any agreement that is currently in place regarding residency.

Immediate family does not include an applicants or his or her partners parents, parents, grandparents, brothers, sisters, aunts, uncles, grandchildren, nieces, nephews, cousins, friends, or lodgers unless they have an extenuating need to live with the applicant

Review of Applications

It is the intention of the Council to review all cases on the Housing Register annually and this may be extended to review cases more frequently especially where a homeseeker is not actively bidding for properties that are available. Where suitable properties are advertised and a homeseeker fails to bid, after the review has been conducted, the application may be removed from the Housing Register for at



least 12 months. Failure to respond to correspondence in relation to the review will result in the applicant being deleted from the Housing Register. Applicants who are deleted will be notified in writing. If good reason can be shown why there was a failure to respond to the review within 6 months of the application being closed then the application may be reinstated.

Housing Needs Panel

The Housing Needs Panel sits once a fortnight or more frequently if required, and will make decisions on the following areas:

The Housing Needs Panel primarily considers cases that have an urgent need to move but which do not fall within other priority categories. Cases considered should be either Council tenants on the Housing Register, Transfer List or homeowners wishing to join the Housing Register.

Urgent need is defined as a situation where there is a substantial risk to the applicant or a member of their household in remaining in their current housing situation or in other exceptional circumstances not covered by existing policies.

The Panel consists of:

- Head of Housing Needs(CHAIR)
- A Housing Needs Team manager
- Head of Housing Management

The Panel may decide on a joint agency approach in order to determine the best course of action, particularly where an urgent move can be avoided and other solutions are to be considered. For example in case of self neglected or where there are safeguarding issues. There is no process of appeal.

Refusals of Offer

A refusal will include both verbal and written refusals, including those made prior to a formal written offer being issued. Due regard will be given to the individual's circumstances and the reason for refusal of the property. Failure to attend an arranged accompanied viewing will be treated as a refusal

Letting Adapted Properties

It is proposed that applicants with mobility difficulties and who have a need for adapted or accessible accommodation will be assessed in accordance with the Accessible Housing Register guidance (AHR) and will be restricted to properties that match their assessed need.

Data Protection

When an applicant applies to the Housing Register, the Council will seek only information that they require to assess the applicant's application and housing needs.

1.4 How does this proposal contribute or relate to other Council initiatives?

Reforms in related areas such as to rent models, allocations policies and measures to address homelessness also impact and in some case overlap with tenure issues. In preparing the Strategy, the Council has therefore had regard to its current Tenancy and Homelessness Strategies, which is required by Government. Consequently, Central Bedfordshire Council has produced a local Housing Green Paper which should be read in conjunction with the Tenancy Strategy and seen in the same light. The Green Paper sets out the complete vision for housing in Central Bedfordshire and like the Tenancy Strategy, is very much evidence based.

The Council's Economic Development Plan includes a focus on creating jobs and supporting people into work.



The Council's All Age Skills Strategy aims to help Central Bedfordshire fulfil its economic potential through addressing a number of skills priorities. This includes priorities around developing the future and current workforce and around raising individuals' aspirations and achievements. It aims to ensure that local people have the skills required by local businesses to secure employment opportunities, whilst supporting the development of the existing workforce to facilitate business growth.

The Council's Child Poverty Strategy includes an objective to maximise opportunities for families in poverty to access employment by developing employability and job readiness skills.

1.5 In which ways does the proposal support Central Bedfordshire's legal duty to:

- Eliminate unlawful discrimination harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

The draft policy includes a number of positive provisions for vulnerable groups for example in relation to disability, domestic violence, carers, looked after children, foster carers, helping people escape the bedroom tax, helping low paid workers who may have families and be living in poverty etc. Further details are provided in section 2.5.

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1.6 Is it possible that this proposal could damage relations amongst groups of people with different protected characteristics or contribute to inequality by treating some members of the community less favourably such as people of different ages, men or women, people from black and minority ethnic communities, disabled people, carers, people with different religions or beliefs, new and expectant mothers, lesbian, gay, bisexual and transgender communities?

In developing the strategy appropriate consideration needs to be given to the longstanding and persistent barriers certain groups can experience in accessing employment and training opportunities. The strategy needs to provide more clarity in relation to what is meant by the terms incentivising work and encouraging tenants to seek employment.

Some groups with protected characteristics are also more likely to be represented in social housing and so careful consideration must be given to the potential impact if changes in eligibility criteria are made. These groups may also need a range of additional support.

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Stage 2 - Consideration of national and local research, data and consultation findings in order to understand the potential impacts of the proposal.

Stage 2 - Consideration of Relevant Data and Consultation

And 2



In completing this section it will be helpful to consider:

- **Publicity** – Do people know that the service exists?
- **Access** – Who is using the service? / Who should be using the service? Why aren't they?
- **Appropriateness** – Does the service meet people's needs and improve outcomes?
- **Service support needs** – Is further training and development required for employees?
- **Partnership working** – Are partners aware of and implementing equality requirements?
- **Contracts & monitoring** – Is equality built into the contract and are outcomes monitored?

2.1. Examples of relevant evidence sources are listed below. Please tick which evidence sources are being used in this assessment and provide a summary for each protected characteristic in sections 2.2 and 2.3.

Internal desktop research

	Place survey / Customer satisfaction data		Demographic Profiles – Census & ONS
√	Local Needs Analysis	√	Service Monitoring / Performance Information
	Other local research		

Third party guidance and examples

√	National / Regional Research		Analysis of service outcomes for different groups
	Best Practice / Guidance		Benchmarking with other organisations
	Inspection Reports		

Public consultation related activities

√	Consultation with Service Users	√	Consultation with Community / Voluntary Sector
√	Consultation with Staff		Customer Feedback / Complaints
	Data about the physical environment e.g. housing market, employment, education and training provision, transport, spatial planning and public spaces		

Consulting Members, stakeholders and specialists

√	Elected Members	√	Expert views of stakeholders representing diverse groups
	Specialist staff / service expertise		

Please bear in mind that whilst sections of the community will have common interests and concerns, views and issues vary within groups. E.g. women have differing needs and concerns depending on age, ethnic origin, disability etc

Lack of local knowledge or data is not a justification for assuming there is not a negative impact on some groups of people. Further research may be required.

2.2. Summary of Existing Data and Consultation Findings: - Service Delivery Considering the impact on Customers/Residents

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- **Age:** e.g. Under 16 yrs / 16-19 yrs / 20-29 yrs / 30-44 yrs / 45-59 yrs / 60-64 yrs / 65-74 yrs / 75+

The UN Principles for Older Persons includes:

- Older persons should be able to live in environments that are safe and adaptable
- Consideration of personal preferences and changing capacities

National Research:

Housing:

- 21 per cent of people over 65 live in social housing,
- 24 per cent of people aged 75 or over live in social housing
- Older people can live in some of the worst housing in the country, often inappropriate to their changing needs

Employment:

- Many retired people regard themselves as having been forced to some degree to retire when they did, for example because of the onset of disability.
- Gender related issues contribute to the factors that inhibit continued work (health for men, caring responsibilities for women) and the kind of work options available
- 62% of over fifties feel they have been turned down for a job because they are considered to old, compared with 5% of people in their thirties
- more than 15% of the youth population is not in education, employment or training

Local Research: Local Economic Assessment:

- People aged 16-24 years old claiming Job Seekers Allowance is still high at 24.2% in April 2013 however has fallen from 26.7% in April 2012

Local Consultation Sheltered Housing Standard 2013 :

Information captured from the questionnaire and consultation event indicates that further consideration should be given to matching / placing tenants in schemes where the profile and circumstances of existing tenants more closely mirrors their own. For example, consultation event attendees raised concerns that the age criteria for sheltered housing is too low; currently set at 55 years of age and above. Younger residents tend to be single, working men, some of which present as being vulnerable (including with mental health issues). However, the general profile of SH residents are widowed women their mid seventies. It was felt that this mix in age and circumstances was causing problems within some schemes and that the needs of younger residents could be met in alternative housing or specific schemes.

Allocation Policy Local Consultation 4th November 2013 to 31st January 2014:

45% of respondents were aged 55 years or over

- **Disability:** e.g. Physical impairment / Sensory impairment / Mental health condition / Learning disability or difficulty / Long-standing illness or health condition / Severe disfigurement

National Research:

Housing:

- Disabled people are twice as likely to experience worklessness as non-disabled people, they are more likely to live in unsuitable or inaccessible housing without essential amenities
- There is a serious shortage of accessible housing for disabled people, leading to a lack of choice and inappropriate housing

Qualifications:

- According to Alkire et al, 2009:231, participation in adult learning by individuals with disabilities is half the rate of those without a disability (46% in Great Britain for non-disabled, 23% for disabled)

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Employment:

- Disabled people are generally more likely to be out of work,
- They are also more likely to exit work and, once out of work, they are less likely to move back into employment than non-disabled people and other groups.
- People with mental health conditions and people with learning disabilities have the lowest employment rates. They are more likely to be economically inactive and are therefore further from the labour market than people with other forms of disability

Local Research: Local Economic Assessment:

- Disabled women in Central Bedfordshire have a higher economic activity rate (68.2 %) than nationally (52.3%). However the economic activity rate for disabled males of working age is lower at 59.2% compared to 61.4% in England
- Employment rate of non disabled females in Central Bedfordshire was 13.4% higher (70.2%) than females who are disabled which stood at 56.8% in December 2012

Allocation Policy Local Consultation 4th November 2013 to 31st January 2014:

19% of respondents stated that they had a disability

One stakeholder commented in relation to employment status:

“This in itself excludes many of the vulnerable who require social housing - those who are long term unemployed with poor employment prospects and particularly those who are too ill or disabled to actually work but considered to be able to engage in “work-related activity”. In not excluding that group of people from the ‘work test’, CBC has shown complete ignorance of how the ESA benefit system actually works. Those in the work related activity group cannot currently be expected to work, their doctor supports this as they will have initially signed them off work, and the DWP has also accepted this through medical examination tests (and/or Tribunal involvement). ‘Work-Related Activity’ means at best considering what options they will have in future for work and what they can do despite their illness or disability to help themselves towards that. Support Group status does not equal disabled either; someone undergoing chemotherapy will also fall into the support group for example.

For CBC to punish people for being in this position of being too unwell to work but not extremely unwell is highly irregular to say the least.

It in effect turns social housing from a provision for those in need, into a provision awarded to a privileged group of people who, aside from their housing need, meet a particular set of circumstances. the policy needs to at very least exclude ESA Work-Related Group recipients from being penalised by the work test, even better would be any recipient of ESA because those newly claiming or appealing a decision will still be being supported by their GP as unable to work.”

- Carers: *A person of any age who provides unpaid support to family or friends who could not manage without this help due to illness, disability, mental ill-health or a substance misuse problem*

National Research:

Employment:

- Between 46% and 62% of carers are not getting adequate services to help them work.
- Less than half of ‘longer-term’ carers aged 16-64 were in paid employment: 45% of those caring for 1-19hours per week; but only 21% of those with the heaviest caring roles.
- Only just over half (56%) felt their employer was carer-friendly and supportive.

Allocation Policy Local Consultation 4th November 2013 to 31st January 2014:

One stakeholder commented;

It discriminates against any culture which views looking after parents as important. Although it says it will make exceptions where the parent or whatever relative has an extenuating need to live with the applicant, it is not clear what extenuating means or how they will come to this decision. I think the



implication is they don't want to consider it unless the person is unable to care for themselves and that is the reason. It is not inappropriate that someone in their 50s may wish to have their parent in their 70/80's living with them to look after them even though they are not extremely disabled or unwell.

- Gender Reassignment: *People who are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex*

National Research:

Housing:

- Trans people may be particularly at risk of housing crisis and homelessness arising from transphobic reactions and harassment by family, neighbours and members of their local community.

Employment:

- Trans people are more likely than others to experience difficulty in finding work or retaining it if their background becomes known to others. High numbers report feeling obliged to change jobs because of workplace harassment and abuse. (EHRC)
- They have been found to be in jobs that are below their skills and educational capacity and appear more likely to work in lower-paid and insecure employment in the public sector, or to be self-employed

- Pregnancy and Maternity: *e.g. pregnant women / women who have given birth & women who are breastfeeding (26 week time limit then protected by sex discrimination provisions)*

Qualifications:

- Teenage mothers are 20% more likely to have no qualifications than older mothers (aged 24 plus).
- A survey of 122 recruitment agencies revealed that more than 70% had been asked by clients to avoid hiring pregnant women or those of childbearing age
- [One in 7 women are made redundant after maternity leave](#)
- [a tenth had been replaced by the person who had covered their maternity leave](#)
- [The campaign group Maternity Action said the number of new mothers seeking advice over discrimination had doubled every year for the last three years since the economic downturn.](#)
- [In 2005 research found 30,000 women each year lost their job as a result of unlawful pregnancy discrimination.](#)

- Race: *e.g. Asian or Asian British / Black or Black British / Chinese / Gypsies and Travellers / Mixed Heritage / White British / White Irish / White Other*

National Data:

Housing:

- 26 per cent of ethnic minority households live in social housing

Housing - Race Equality Foundation:

- The black and minority ethnic populations, and their proportion of England's overall population, are growing. The demand for affordable housing from black and minority ethnic households is likely to increase in the future
- High house prices, together with tightened credit regulations and lending criteria, have made it increasingly difficult for newly formed households to access home ownership. This may lead to lower home-ownership rates in the future, especially among Pakistani and Bangladeshi populations
- The locational preferences of black and minority ethnic households are changing, but fear and threat of racism continue to restrict black and minority ethnic households' area choice
- Although cultural preferences regarding the design of the dwelling continue to exist, preferences are



generally influenced more by household size and type than by ethnicity per se

- Bilingual and culturally sensitive services are of great importance, especially to recent migrants and to older people born outside the UK.
- Large properties of four or more bedrooms form only 2% of England’s social housing stock (SEH, 2005- 2006), making it difficult for large households to access suitable properties in the social rented sector, especially via mainstream service providers. Like white British households, most BME households with children want or need larger homes (with three or more bedrooms), preferably with gardens. If the number of children is high, an even larger home is required. At the moment, overcrowding is common among certain BME groups in both the social rented and the private sector (London Housing, 2004; SEH, 2003-2006). In fact, overcrowding caused by inability to afford sufficiently large homes in the private sector may well be one of the key reasons for BME populations’ high interest in social rented housing.

Qualifications:

- Attainment amongst some ethnic minority groups, including individuals from Black, Pakistani and Bangladeshi communities, is below that for the population as a whole.
- Black Caribbean people stand out as having lower levels of functional literacy even among those for whom English is a first language. For other ethnic groups, the level of basic skills is similar for those that have English as a first language.
- In some ethnic and religious groups there are large numbers of women without any qualifications: Among Black Caribbean women, Mixed Race women and Muslim women, between a quarter and a third have no qualifications compared to 1 in 8 White women. Large groups of Pakistani and Bangladeshi men have no qualifications. Nearly 1 in 3 Bangladeshi men and 1 in 4 Pakistani men are in this situation compared to 1 in 8 White men.
- Attainment is particularly low amongst individuals from Gypsy and Traveller backgrounds

Employment:

- Overall black and minority ethnic people are more likely to be unemployed, irrespective of their qualifications, place of residence, sex or age. They are less likely to hold senior management positions. (Equality Review (ER))
- Recent experiments show clear evidence of discrimination in whether people are offered employment opportunities, with interviews depending on the apparent ethnicity in their CVs.(National Equality Panel)
- People from an ethnic minority community are 13% less likely to find work than a white person. (Labour Force Survey 2008)
- Pakistani and Bangladeshi women with the same characteristics as White women are 30% more likely to be out of work. (ER)
- Black African and Bangladeshi men, can also experience significant employment penalties. (ER)
- Gypsies and Irish Travellers can face barriers to employment due to low literacy levels. (Commission for Race Equality)
- Based on current rates of progress it is predicted that it will take nearly 100 years for people from ethnic minority communities to attain the same job prospects as white people. (Government Equalities Office)

Central Bedfordshire Population Data;

Ethnic group	2011		2001
	Number	%	%
White	238,700	93.8%	97.3%
- White British	228,100	89.7%	94.0%
- White Irish	3,100	1.2%	1.3%
- White Gypsy or Irish Traveller	500	0.2%	n.a.
- White Other	7,000	2.8%	2.0%



Mixed	4,800	1.9%	0.9%
Asian or Asian British	6,400	2.5%	1.1%
Black or Black British	3,600	1.4%	0.5%
Other ethnic group	900	0.3%	0.2%
Total	254,400		

Local Research: Local Economic Assessment:

- A greater proportion of Black/African/Caribbean and Black British people work in lower managerial, administrative and professional occupations in the area than nationally

Local Research: Central Bedfordshire Labour Market Inequalities Report:

- While there is a smaller proportion of people from an ethnic minority in the CB area than nationally, a higher proportion of them are in employment compared with the British white population.
- British white women aged 16-64 have employment rates of 66.8% compared with their ethnic minority counterparts, who have an employment rate of 85.6%.

Allocation Policy Local Consultation 4th November 2013 to 31st January 2014:

77% of respondents were White: British and 13% of respondents preferred not to state their ethnicity

- **Religion or Belief:** e.g. *Buddhist / Christian / Hindu / Jewish / Muslim / Sikh / No religion / Other*

National Research:

Housing:

- Certain faith groups tend to have larger families and therefore require larger dwellings

Qualifications:

- According to the 2001 Census however, 23.5% of Muslims and 28.9% of Sikhs aged 16 to 24 had no qualifications. This compares to 15.8% of Christians and 11.7% of Hindus. Similarly, the percentage of young Muslims and Sikhs qualified to level 2 is also lower. There is variation by age however, with a lower proportion of Muslims aged 50-59 having no qualifications than Christians, Hindus and Sikhs.

Employment:

- Only 61% of Muslim men have jobs compared to 80% of Christian men and 82% of Hindu men. (Government Equalities Office)
- There is emerging evidence that Indian and White Muslims experience employment disadvantage when compared to Indian and White Christians

Allocation Policy Local Consultation 4th November 2013 to 31st January 2014:

51% of respondents' stated their religion or belief was Christian and 30% of respondents stated they had no religion or belief.

- **Sex:** e.g. *Women / Girls / Men / Boys*

National Data:



Housing:

- Many women live alone with the proportion increasing, as they get older. Older women living alone are more likely to be living in poverty and provision of appropriate shared accommodation might be financially and socially beneficial for some groups.
- Women-headed households tend to be more reliant on social housing – local authority and housing association accommodation. This applies in particular to lone parent households, 60% of whom live in social housing, compared to 23% of other households with dependent children. For these households, larger size dwellings are more appropriate and can reduce the stress of living in overcrowded conditions.
- The vast majority of homeless and temporary accommodation households are headed by, or include, women.

Qualifications:

- Generally, girls perform better than boys educationally. Nationally, in 2009/10, 51.1% of boys achieved five or more GCSE passes at grades A* to C, including maths and English, compared to 58.6% of girls.
- Only 18% of poor White British Boys achieve 5 or more GCSE passes. Less able boys are virtually unemployable because they lack interest, drive, enthusiasm and social skills
- Women are far less qualified in the older part of the population than men, but are more or less equally qualified below the age of 35

Employment:

- Over the last 30 years, three groups below retirement age stand out as suffering particularly large and persistent employment disadvantages or penalties:
 1. disabled people;
 2. mothers;
 3. Pakistani and Bangladeshi women.

They are all significantly more likely to be out of work regardless of their qualifications or where they live. The effect of non-employment in their working years continues to cause these groups additional disadvantage in older age.

- Many women bear the majority of the responsibility for childcare with the result that 44% of women work part time compared to 10% of men. Part-time work can limit career progression; lead to lower pay and reduced pensions. (EOC)
- 38% of mothers and 11% of fathers have left a job or been unable to take one due to caring responsibilities

Local Research: Local Economic Assessment:

- Female unemployment rate has continued to increase during 2012 and is now above comparator areas at 8.2% in December 2012

Local Research: Central Bedfordshire Labour Market Inequalities Report:

- Women in the CB region are less likely, in relation to men, to have achieved NVQ4+.
- More women than men are without any qualifications in CB than in England as a whole
- For those aged 16-19, female employment is far higher than male employment.
- However, within the 20-24 age band, this is reversed. Female employment rates do not recover after this. This may relate to the age of first maternity
- CB appears to show a highly gendered breakdown in occupations, with more than double the percentage of men in higher managerial, administrative and professional occupations than women.
- For younger women, the major barriers include a desire to be with children when they are small and lack of transport. The desire to be with their children when they are small can be attributed to a variety of causes, including the quality and/or cost of childcare, and a 'maternal desire' to care for them in person. It is not possible to clearly delineate the respective influences each cause has in respect of younger women's choices.
- For older women, health problems, the attitudes of employers and practical issues relating to moving off benefits, internet access, childcare and transport are the biggest problems.

Allocation Policy Local Consultation 4th November 2013 to 31st January 2014:

29% of respondents were male, 67% were female and 4 % preferred not to say



- **Sexual Orientation:** e.g. *Lesbians / Gay men / Bisexuals / Heterosexuals*

National Research:

Housing

- Some younger LGB people may experience homelessness as a result of having to leave the family home and may live in poor quality accommodation as well as facing hate crime. Older LGB people are 2 ½ times more likely to live alone

Qualifications

- 65% of young lesbian and gay people have experienced homophobic bullying. This can contribute to increased truancy and subsequently reduced levels of attainment. Lesbian and gay young people are also more likely to leave school at 16.

Allocation Policy Local Consultation 4th November 2013 to 31st January 2014:

78% of respondents stated that they were heterosexual.

- **Other:** e.g. *Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion, Marriage and Civil Partnership*

1) Poverty / Deprivation National Data:

Poverty & Work

New Policy Institute Analysis of the latest data on poverty in the UK 2013 indicates that

- more than half of the 13 million people living in poverty in the UK in 2011/12 were in a working family;
- while the labour market has shown signs of revival in the last year, the number of people in low-paid jobs has risen and average incomes have fallen – around five million people are paid below the living wage;
- there is substantial movement in and out of work – 4.8 million different people have claimed Jobseeker’s Allowance in the last two years;

Housing:

- 18% of all households in England live in social housing
- 60% of social housing tenants are economically inactive (31% are retired and 29% are otherwise economically inactive)
- 6% of social housing tenants are unemployed
- There are also large numbers of disabled people, and people on housing benefit living in social housing. Vulnerable groups are concentrated in the social housing sector, where there are low rates of employment and low income levels:
 - The median gross income for households in social housing in 2007/08 was £10,900, compared with £23,320 for households across all tenures.
 - 44% of households in social housing have an annual income of less than £10,000.
 - Only 7% of all households in social housing have a gross annual income of £30,000 or above
- Poverty can lead to **overcrowded and poor quality housing conditions**, placement in temporary accommodation, often in disadvantaged areas where there are insufficient social facilities or public transport levels.
- Children living in such conditions are more likely to experience lower educational attainment and poorer health outcomes. Housing policy can make a real difference to the quality of children’s lives, especially those who are living in poor quality, overcrowded and inappropriate accommodation. Dwelling sizes also need to allow for space for children to carry out their homework without interruption and should have sufficient levels of play space and natural light



Qualifications;

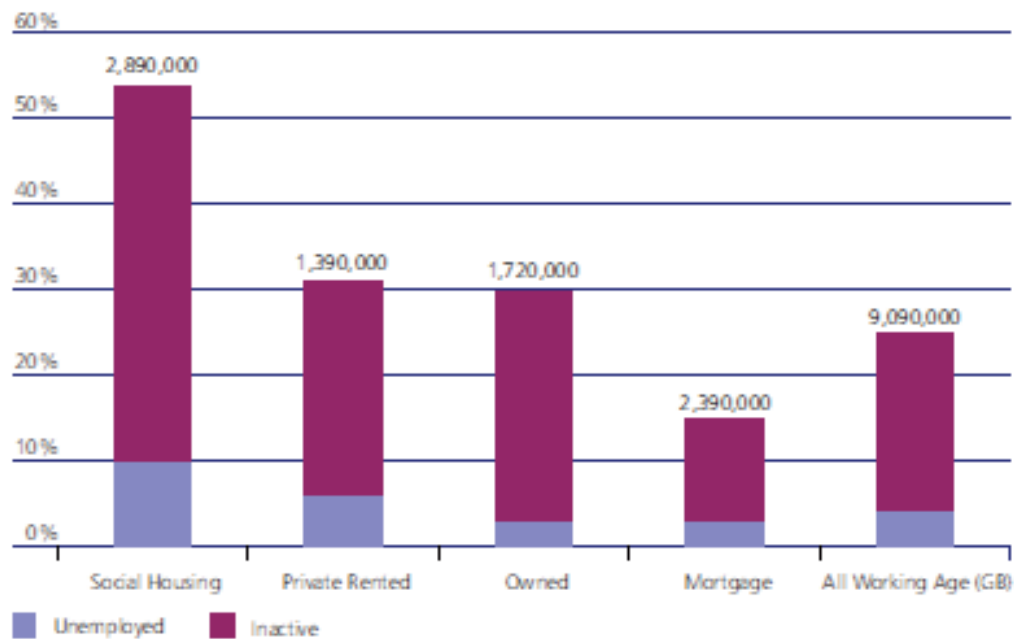
- Poverty and deprivation are strongly linked with educational attainment. Children who grow up in poverty are less likely to achieve qualifications or to go on to higher education. This then has an impact on their employability and contributes to an intergenerational cycle of poverty
- One in eight adults of working age have no qualifications
- A quarter are not qualified to Level 2
- Just under half are not qualified to above Level 2
- One third of adults do not hold the equivalent of a basic school-leaving qualification
- One half of adults (17 million) have difficulty with numbers

Employment & Living in Social Housing;

(Source Ends and means: The future roles of social housing in England John Hills 2007 - Centre for Analysis of Social Exclusion London School of Economics)

- The employment rates of those living in social housing with particular disadvantages or with multiple disadvantages are substantially lower than those of people with similar disadvantages but living in other tenures.
- Even controlling for a very wide range of personal characteristics, the likelihood of someone in social housing being employed appears significantly lower than those in other tenures.
- Of those with no qualifications, 43% are workless if they do not live in social housing, but 70% of those living in social housing.
- 35% of lone parents are workless outside social housing, but 64% within it.
- For those with none of the specified labour market disadvantages, 13% are workless outside social housing, but 29% within it.

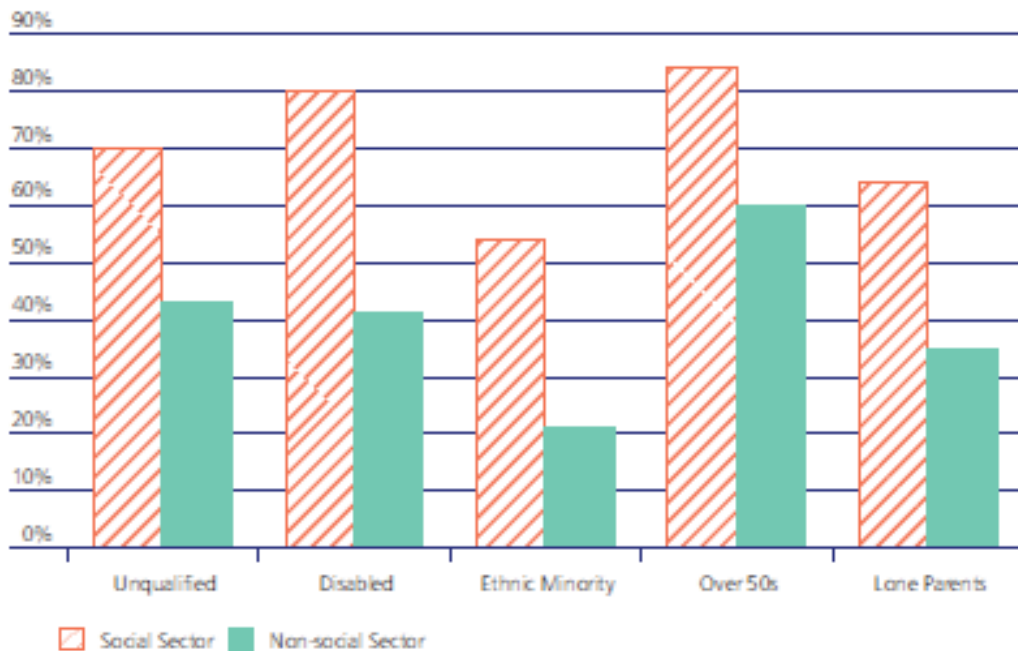
Figure 10.1 Worklessness by tenure in Great Britain, Spring 2006



Source: Labour Force Survey, Spring 2006. Includes students.



Figure 10.2 Worklessness by DWP public services agreement target group, Spring 2006



Source: Labour Force Survey.

- Social tenants are more likely to have overlapping disadvantages in the labour market – 37% have two or more disadvantages, compared to 29% of owner-occupiers and 13% of private tenants.
- But for any given number of overlapping disadvantages, those in social housing have lower employment rates. For instance, for those with two of these overlapping disadvantages, the overall employment rate is 53%, but for social tenants, it is less than 33%.
- Current Allocations policies create concentrations of poverty with a detrimental impact on both community cohesion and sustainability.
- Hills recommended an examination of “the way allocations and access policies work to try to reduce the extent to which they are sometimes an engine of polarisation, even within the social housing stock.”

2) Child Care Costs and Employment

Families on low-incomes across the UK are having to turn down jobs or are considering leaving work because they can't afford to pay for childcare, according to new research from Save the Children and Daycare Trust. The survey also found that parents, regardless of income, say that they can't afford not to work, but struggle to pay for childcare. And despite many parents cutting back their spending, almost a quarter have got into debt because of childcare costs.

Parents in Britain spend almost a third of their incomes on childcare - more than anywhere else in the world - and such high costs have the greatest consequences for the poorest families. Of those families in severe poverty, nearly half have cut back on food to afford childcare and 58% said they were or would be no better off working once childcare is paid for.

The cut to the working tax credit has also dealt a massive blow to hard working families struggling in severe poverty with four in ten of those affected considering giving up work because they will no longer earn enough to cover the childcare bill. The cut has added on average £500 per year on to the childcare bill of low income families.

Other key findings:



- A quarter of parents in severe poverty have given up work and a third have turned down a job mainly because of high childcare costs - more than twice as likely as better off parents.
- Of those parents in severe poverty and currently in paid employment the majority (80%) agreed with the statement "Once I have paid for childcare, I am in a similar position to as if I was not working".
- The majority of parents living in severe poverty (61%) said they were struggling to pay for childcare compared to around a third of parents on higher incomes (37%).
- Families in severe poverty were twice as likely as better off families to move home because of the high costs of childcare.
- 26% of parents in severe poverty have been unable to take up education or training because of high childcare costs.
- 63% of parents, regardless of income, say they can't afford not to work but struggle to pay for childcare.
- The costs of childcare are on a par with 41% of families' mortgage or rent payments.
- A quarter of parents, regardless of incomes, said the cost of childcare has caused them to get into debt

3) Looked After Children:

- Young people leaving care are one of the most vulnerable groups in our society:
 - they are three times more likely to be cautioned or convicted of an offence
 - they are four times more likely to have a mental health disorder
 - they are five times less likely to achieve five good GCSEs, eight times more likely to be excluded from school and less likely to go to university
- 30% of homeless people have been in the care system.
- For the majority who do stay housed, there's the challenge of balancing college or work with the need to be completely self-reliant.
- 27% of 16 year olds are given council accommodation, benefits and are left to get on with it.
- Almost half of young people leaving care think they are made to do so too early and say they receive very poor preparation for coping with adult life on their own

4) Local Housing Data:

The new housing requirement for Central Bedfordshire identified in the 2009 SHMA is:

- 18 000 new units of market housing
- 6 500 new units of social rented housing
- 2 500 new units of intermediate market housing (housing for people who can afford more than a social rent, but cannot afford to buy on the open market).

In 2011, 230 new social rented properties and 140 new units of intermediate market housing were built, exceeding the target to build 300 new affordable homes per year.

At 31 March 2012, there were a total of 4213 households on the housing register for Central Bedfordshire. Of these, 1956 households are in housing need, according to the legal definition.

An estimated 1198 households are under-occupying Central Bedfordshire council tenancies – this is around 20% of tenants. Just over half of these households are aged 65 and over whilst the remainder are headed by a person of working age.

Lettings of Social Housing:

During 2011-12, there were a total of 1,068 lettings of social housing. These 1,068 lettings include 230 lets of newly built social rented housing, and 838 lettings of social rented properties which became empty because the previous tenant moved out.

Analysis of waiting times shows that on average, the households allocated these properties had been on



the housing register for 40 weeks. Around 80% of households had been waiting for less than one year when they were allocated their property.

More detailed analysis shows that in general, households had longer to wait if they were in low housing need; and that no allocations of two, three and four bedroom houses were made to households in the lowest housing need (in Band 3A). Waiting times were also generally longer for one bedroom properties and 2 bed houses.

Analysis of lettings by location showed that a higher proportion of lettings in the south of Central Bedfordshire were made to applicants with urgent housing need than in the north. Lettings to Band 3 are 63% of all lettings in the north, and 52% of all lettings in the south

Social rented housing is currently allocated through the Choice Based Lettings system, which allows people to bid (apply for) properties:

- Most applicants are from Central Bedfordshire, and Central Bedfordshire applicants are more likely to be successful than people from outside CBC.
 - For the four months from May to August 2013 there were an average of 2,850 bids (applications) for properties within Central Bedfordshire each month. 58% of these bids were placed by people already living within the area, an average of 1,660 applicants each month
 - Central Bedfordshire residents are more likely to be successful bidders winning around 75% of properties in the area, or an average of 58 out of the 76 properties let each month.

Housing Register:

There were a total of 4213 households on the Housing Register in Central Bedfordshire at 1 April 2012. Of these, 1956 are in 'social housing need', in Bands 1, 2 and 3. A further 2257 households are in Band 4. These households are not assessed as being in social housing need. This definition is drawn from the legislation and means those that the law requires us to give reasonable preference to in the allocations scheme. Only 100 of the lettings made in 2011-12 were made to applicants from Band 4.

Where households have had extended waiting times on the housing register, this can be for a number of reasons. It can simply indicate that the household has not been successful in bidding for properties, and that the system has therefore not been able to meet the household's needs. It may also be that the household has been holding out to bid for a particular type of property in a particular area and is prepared to wait for that vacancy to be advertised. However, long waiting times can also be caused by households having a period of 'reduced preference' when they are on the list but unable to bid, for example because of issues with anti-social behaviour. Some very old applications are 'inactive', meaning that the applicant has found their own housing and given up their application, but not told the Council to take their name off the list.

A total of 168 Central Bedfordshire Council tenants were registered for a transfer to a different social rented property at 1 April 2012. Of these, 100 are in social housing need, meaning that their current property is unsuitable for them in some way.

Amongst transfer applicants, 40% of those applicants that are in social housing need have been waiting longer than one year.

Homelessness Demand:

During 2011-12, Central Bedfordshire Council accepted a full duty to house 169 homeless households. Of these, the majority were homeless because they had been asked to leave their current home by their parents.

During 2011-12, Council officers carried out 523 Homelessness Preventions. This is where a council officer helps the applicant who is threatened with homelessness to stay in their current home, or to make a planned move to alternative accommodation

Allocations to Working & Non Working People and How this Might Change Under the New Policy:

- All homes are good standard. Some will be "more suitable" than others, depending on personal



circumstances. e.g. distance to school, or a mobility problem.

- Last year, CBC let 860 lets, the year before 1060.
- 10% were to band 4's, so not in the reasonable preference categories i.e. people with low housing need.
- 750 minimum are allocated to the reasonable preference categories.
- On sign up, about 35% of applicants are working. Therefore about 235 homes go to working people and about 515 to non working. Plus about 100 to "no real need at all"
- In modelling, it is envisaged that CBC is not likely to have increasing numbers of people with reasonable preference. The number in the year is reasonably fixed - assume 750 per annum. The question to consider is whether "employed people" will always be at the top of the list, causing not employed people to never be successful.
- It is unlikely that there are enough eligible, "employed people" in Central Bedfordshire, who also fall into a reasonable preference category to cause non employed people to wait (very much longer).
- To put this simply, the employed people who are also in housing need run out very quickly. Plus, CBC will still agree a substantial number of lettings to non working people (about 500).
- It is estimated that average wait times might increase from 40 weeks, for non working people – to a maximum of 60 weeks. Employed people are likely to average a wait of 20-25 weeks

5) Local Research: Local Economic Assessment:

- The jobs growth rate whilst increasing by 700 in 2011 is not keeping pace with the population growth rate. This would need to double in order to meet the Council's aspirations of 1,350 jobs per year in line with the Development Strategy
- Attainment at most NVQ levels has fallen over the past year and there is now a higher percentage of people of working age with no qualifications than national and regional levels for the first time since 2006 at 9.6%
- The unemployment rate has been increasing during 2012 (6.3% in December 2012) in particular for women and young people with levels higher than pre-recession and there remain pockets of deprivation in parts of Central Bedfordshire.
- At the same time, the level of young people not in education, employment or training although lower than nationally and regionally however has witnessed a slight increase
- The cost and provision of public transport remains a significant barrier for residents accessing the local labour market. This is particularly an issue for young people and women.
- **Job density** is a measure of the total number of filled jobs in an area compared to the resident working age population. It reflects the degree to which employment opportunities are available locally. In 2011 the job density in Central Bedfordshire was 0.65, meaning **there are 0.65 jobs for every working age resident**. This means less than 1 job per working age resident. This has risen from a low of 0.60 in 2009, but still remains below all comparator areas, as can be seen in the table below and shows the highly mobile nature of the Central Bedfordshire labour market in terms of out-commuting to high value jobs elsewhere. It has remained the same in both 2010 and 2011

Area	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Central Bedfordshire	0.64	0.63	0.63	0.64	0.65	0.64	0.64	0.65	0.60	0.65	0.65
South East Midlands	0.80	0.79	0.81	0.83	0.83	0.8	0.82	0.81	0.79	0.79	0.80
England	0.8	0.8	0.8	0.8	0.81	0.8	0.8	0.79	0.78	0.78	0.78
East	0.77	0.78	0.78	0.77	0.78	0.78	0.78	0.77	0.76	0.75	0.76

Local Research: Central Bedfordshire Labour Market Inequalities Report:

- The downturn in the economy, changing support services for long-term unemployed people and alterations in the types of work and contracts offered has meant that those people who find it harder to get jobs (often for reasons associated with protected characteristics) are increasingly



marginalised

- The report 'Employability and Skills in the UK: Redefining the debate'¹ (2010) suggests that there will be an increasing demand from employers for a 'high skill' workforce
- Labour Market Outlook – Spring 2013² identifies that on average 50% of candidates do not feel suitably qualified for low skilled jobs.
- 1000 HR professionals questioned for this survey reported that 29% of the jobs offered in the next quarter would be temporary jobs
- The report also looks at the employability of school leavers, long-term unemployed people, older people nearing retirement, graduates into their first job and lone parents. 24% of employers said that they would not consider recruiting from one or more of these groups, with school leavers being rejected by 14% of employers and long-term unemployed people by 11%.
- The report 'The Three Divides', written in 2010³ by the Institute of Education, University of London, looks at the major barriers to employment for jobseekers. It focuses initially on literacy and numeracy challenges, but moves on to say that digital illiteracy is an increasing barrier to job seeking and a vital job skill. If individuals do not have this skill or access to technology they are, and will continue to be, marginalised in the employment market.

Central Bedfordshire Resident Impact Analysis 2013

- An estimated 7,000 people (5.3%) were unemployed in June 2013, lower than the national average of 8.0%. Although there is some fluctuation each quarter, this figure has been relatively stable over the last two years.

Allocation Policy Local Consultation 4th November 2013 to 31st January 2014:

58 respondents (57% of respondents) agreed that people with no housing need should be stopped from joining the housing register

- 68 respondents (67%) agreed that social housing is let to people with a '**local connection**' in Central Bedfordshire
- respondents who did not or did not know 34% if they supported the proposal indicated that 3 years was too long and that peoples individual circumstances should be considered before imposing timescales. Individual circumstances included being closer to an elderly relative or fleeing domestic violence
- 68 respondents, (67% of respondents, supported this proposal people who do not live in Central Bedfordshire can be treated as having a local connection if they have been **employed** in Central Bedfordshire for 6 months
- 62 respondents, (61% of respondents), indicated that they agree with the proposal to introduce a much **simpler system** for banding applicants for housing.
- 67 respondents (66% of respondents) support the proposal, to introduce an '**employment priority**' into its allocations,
- 24 respondents, (23% of respondents), provided qualitative feedback that did not support this proposal and raised issues regarding the current economic climate and that the impact of disability could affect how they will be assessed under the proposed policy.
- Qualitative feedback from staff consultation included concerns of how assessments will be made with regard to people regaining employment and suggesting the inclusion of those people actively seeking employment.
- 82 respondents (80% of respondents) agree with this proposal **to exclude people who are bad tenants from the housing register.**
- 9 respondents, (8% of respondents), did not support the proposal. Qualitative feedback raised concerns about; where excluded people will go; the impact on any younger household members

¹ <http://www.theworkfoundation.com/Reports/273/Employability-and-Skills-in-the-UK-Redefining-the-debate>

² CIPD in conjunction with Success Factors – www.cipd.co.uk/hr-resources/survey-reports/labour-market-outlook-spring-2013.aspx

³ www.nrdc.org.uk/digitaldividesummary



and that assessments should be made on a case by case basis

- 87 respondents, (85% of respondents), agree with the proposal to **support low paid workers** who rent their homes from a private landlord
- Qualitative feedback from staff contained mixed views with regard to this proposal. Support was given to the proposal due to the higher rates of rents within the private sector,, counterbalanced by issues with regard to the need to rehouse tenants that are already in adequate accommodation.
- In summary, the majority of the 102 respondents were in support of each of the 10 proposals put forward in the formal consultation. Whilst there was support for the proposals as being fair and welcome, the consultation raised a number of wider issues; that the current banding and assessment and banding system is fair and satisfactory, a new system may make the housing process more complicated as the current economic climate and unemployment levels may impact on the need for social housing and proposed changes to the Allocation Policy.

One stakeholder commented that:

- *the **income limit** is too restrictive. It is right there should be an upper limit, but there should be different limits depending on whether it is a couple of single person applying. If there isn't, it will penalise a couple for both working. Two people working full time at minimum wage will earn more than £20k per year.*
- *The policy excludes children over 21 from living with their parents. This is very short-sighted. 3 bed properties currently have a low demand and high supply, and applying this to the policy will basically mean further reducing those that can get 3 bed houses. It will force those applicants to split, meaning the young adult has to apply for a highly in demand 1 bedroom property on their own, alongside perhaps their siblings and parents also, thereby **INCREASING** demand for social housing*

2.3. Summary of Existing Data and Consultation Findings – Employment Considering the impact on Employees - Not Applicable

- **Age:** e.g. 16-19 / 20-29 / 30-39 / 40-49 / 50-59 / 60+ **N/A**

- **Disability:** e.g. Physical impairment / Sensory impairment / Mental health condition / Learning disability or difficulty / Long-standing illness or health condition / Severe disfigurement **N/A**

- **Carers:** e.g. parent / guardian / foster carer / person caring for an adult who is a spouse, partner, civil partner, relative or person who lives at the same address **N/A**

- **Gender Reassignment:** People who are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex **N/A**

- **Pregnancy and Maternity:** e.g. Pregnancy / Compulsory maternity leave / Ordinary maternity leave / Additional maternity leave **N/A**

- **Race:** e.g. Asian or Asian British / Black or Black British / Chinese / Gypsies and Travellers / Mixed Heritage / White British / White Irish / White Other **N/A**

- **Religion or Belief:** e.g. Buddhist / Christian / Hindu / Jewish / Muslim / Sikh / No religion / Other **N/A**

- **Sex:** Women / Men **N/A**



- **Sexual Orientation:** e.g. *Lesbians / Gay men / Bisexuals / Heterosexuals* N/A

- **Other:** e.g. *Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion, Marriage and Civil Partnership* N/A

2.4. To what extent are vulnerable groups more affected by this proposal compared to the population or workforce as a whole?

Access to appropriate housing is particularly important for reducing inequalities, because too often those who are most disadvantaged are more likely to be living in housing that does not adequately meet their needs. Lack of choice and quality in housing stock means that the most vulnerable communities are often housed in cramped, poor quality accommodation within deprived areas. These areas include high concentrations of people from ethnic minority communities as well as women, older people living alone and families with young children. Poorer families are also more likely to be living in overcrowded housing, with significant health and quality of life implications.

There is evidence that current allocations policies create concentrations of poverty which can have a detrimental impact on both community cohesion and sustainability.

There is longstanding, as well as new and emerging evidence which demonstrates that women (especially mothers whether they are single or partnered), *Pregnant and new / nursing mothers*, disabled people and certain BME / religious groups experience substantial and enduring barriers and discrimination in relation to employment.

Consideration should also be given to whether residency requirements have the potential to indirectly discriminate against BME Groups. The National Code of Practice on Racial Equality in Housing identified that local connection criteria has the potential to disproportionately disadvantage newcomers and outsiders without any local connections and that if the newcomers who want houses are from different racial, ethnic or national backgrounds to people in the local community, a policy with a local connection criteria could have a discriminatory effect. To strike a balance between the legitimate aims of the policy and any discriminatory effects it might have, the Code of Practice highlights that the following questions should be considered in order to determine the scale of any possible discrimination.

a. How many people in need of affordable housing are excluded by the policy, and what proportions are excluded on racial grounds? How restrictive is the policy in denying access to the housing in question? The more restrictive it is (for example, in the length of residence required), the more likely it is to be unreasonable, and therefore to result in unlawful indirect discrimination.

Existing central Bedfordshire Applicants by Ethnic Origin - Total 3170

White British 2456	White Irish 22	White Other 112	Mixed White and Black Caribbean 29
Mixed White and Black African 12	Mixed White Asian 9	Other Ethnic Group 6	
Asian Indian 5	Asian Pakistani 4	Asian Chinese 6	Asian Bangladeshi 3
	Asian Other 9		
Black Caribbean 33	Black African 63	Black or British Other 14	
Other Ethnic Group Arab 3	Other Ethnic Group Other 8	Refused 25	Blanks 351

77% of existing applicants for social housing are White British compared to 89.7 % of the Central Bedfordshire population. This indicates that BME groups currently have good access to the housing register. It is not currently known how this ratio may change under the revised policy but respondents to the consultation have not indicated a concern that BME groups will be unfairly excluded.



- Length of residency

There are no datasets that show length of residency in a local authority area, either in total or by ethnic group. The 2011 Census did include questions on length of residency in the UK overall. The majority of Central Bedfordshire residents have lived in the UK for at least 5 years. Just 2% (4,700) have been in the UK for less than 5 years. This is lower than the England average of 4%. However, we do not know whether they have moved within the UK, or remained in the same local authority area. We do not have any breakdown for those born in the UK.

b. What type of local connection is required? For example, does the applicant have to be born in the area, or have extended family living in the area, or have a job in the area? The more ways an applicant can demonstrate eligibility, the less likely the requirements are to be indirectly discriminatory.

The Council has adopted simple rules to define a person having a “Local Connection” – they must have lived continuously in the Central Bedfordshire area for 3 years at the time of registration and need to remain resident in the area to preserve that registration, or be in contracted employment in the area and have been for a period of at least 6 years

c. Are there other ways, besides having a local connection or being a resident, to qualify for the housing? Again, the more restrictive the criteria, the more likely they are to be indirectly discriminatory.

There are a number of exceptions to the local connection requirement. These are:

- A person who is serving in the regular forces or
- A person who has served in the regular forces within five years of the date of their application for an allocation of social housing under Part VI of the Housing Act 1996.
- In a class of people prescribed by regulation who cannot be deemed a non-qualifying person due to a lack of connection to one of the local authority areas. (for example MAPPA, MARAC, Witness Protection, owed a homelessness duty as a person fleeing Domestic Violence.)
- A ‘looked after child’ as defined by Children’s Services in another region.
- Giving or receiving care to a member of the family and to be denied access to the housing register would be detrimental to this. The Council will only give access to the Housing Register to somebody where care and support are an issue if there is no one currently living with the applicant who can reasonably provide the support they need.
- Covered by previously agreed reciprocal arrangements with members of the Homefinder Partnership.
- Their residence in Central Bedfordshire has been broken due to placement in an institution or care placement or supported living scheme outside the area; and had this placement not occurred they would have satisfied the residence criteria set out above.
- Applying for sheltered housing
- Existing CBC tenant

d. Do the restrictions apply to all affordable housing or only a portion of it? If all the affordable housing provided, or a large proportion of it, is bound by restrictions, the more likely the practice is to be indirectly discriminatory.

One of the key concerns for the Council is making sure it maximizes the supply of affordable housing stock in Central Bedfordshire, and to ensure that it is as affordable as housing finance allows it to be, and that it is appropriately targeted at households who are in genuine housing need. The Council works closely with developers to make sure the type and mix of housing in the area is appropriate.

The National Code of Practice on Racial Equality in Housing states that when assessing the justification for policies and practices that could have a disproportionate effect on a racial group (or groups), it would be useful to consider the following questions, in the order given below.

a. Does the provision, criterion, practice, requirement or condition correspond to a real need?



The CBC Housing Green paper highlights the following:

- At least 20% of our general needs housing stock is under occupied by one bedroom or more.
- There are 4213 households on the housing register, but only about 55% are actively bidding for properties.
- Current research indicates that around 6,200 more social rented housing units are needed before 2031.
- 55% of new general needs social housing tenants in the CBC area derive their income solely from state benefits and/or pensions.
- Around 120 new housing applications are received each month but only a relatively small proportion of these will be in 'housing need', meaning that the majority of households are suitably housed, but are approaching the Council because (typically) they want accommodation that is either less expensive; or perceived to be 'more secure'.
- Across Central Bedfordshire, it is estimated that there are at least 1500 older person households living in social housing who are under occupying their home (according to official definitions of the number of bedrooms needed by a household).

Summary

The emerging picture in Central Bedfordshire is one in which the supply of new lettings is broadly aligned to local need. However, there are geographical variations in the alignment of supply and demand; and the available data shows the crucial role of new affordable development, at the level recommended

in the SHMA, in achieving that balance between supply and demand.

The evidence further suggests that reducing under-occupation, and offering time-limited tenancies, will allow the council to meet more housing need from within the existing housing stock, and in turn make better use of the funding available for new housing.

Finally, the emerging picture of need and supply suggests that there is potential to use housing allocations to reward and support employment without unduly compromising the Council's ability to meet the needs of people with reasonable preference.

b. Does the need pursue a legitimate aim; for example, health and safety?



The CBC Housing Green paper highlights the following aims:

THE VISION FOR HOUSING IN CENTRAL BEDFORDSHIRE

- Social mobility will be supported with a range of products which will open up home ownership and 'affordable' renting to a greater number of households, helping people onto the 'housing ladder'.
- The local housing market will offer a good choice of locations, property and tenure types to older people.
- Well-managed, good quality social housing will be used to provide a strong safety net to those who are vulnerable.
- Social housing will be allocated fairly, and used to support people's working lives.
- Social landlords will support their tenants to make the most of their tenancy as a springboard into work and financial stability.

c. Are the means used to achieve the aim appropriate and necessary?

As part of the development of the vision, detailed needs analysis and extensive engagement with a wide range of stakeholders is being undertaken which is underpinned by equality analysis. The information derived from this process is helping to refine the Council's proposed approach.

d. Is there any other way of achieving the aim in question?

The Allocation policy should not be considered in isolation, the CBC Housing Green paper highlights a range of initiatives;



There are a number of tasks for the Council to undertake in order to respond to the changes introduced by central government. The key actions over the next three to five years are –

- Adopt a Development Strategy by March 2014.
- Adopt a **Tenancy Strategy** by April 2013, including an Equality Assessment, to mitigate adverse impacts on potentially disadvantaged groups of people.
- Review the Lettings policy, in response to the Localism Act and the Code of Guidance – during 2013.
- Mitigate and manage the impacts of the Welfare Reform Act – ongoing.
- Conduct a homelessness review and produce a new Homelessness Strategy – during 2013.
- Develop a Supported Housing Strategy for Central Bedfordshire – during 2013.
- Develop the Council's Vision for the Landlord Service, which manages the stock of 5200 homes, to support the change agenda – ongoing.

e. Is there a way of reducing any potentially unlawful discriminatory effect?

A counsel's opinion was provided to the Midlands Rural Housing Board in 2007.

- *“Two of the examples of lettings criteria are considered to have proportionate qualifying times attached (i.e. 12 months). However other examples are considered to be very restrictive, with a strong possibility of a court finding that it infringes the RRA due to the application of ‘a strong local connection’ and ‘10 year residence’ criteria. In effect this could be deemed to be disproportionate to achieving the legitimate aim. (In short, do you need such strict criteria to ensure that people with a local connection are re-housed? Does this criteria mean a significant group of people, with a local connection are excluded? Does it, therefore, follow that this is unjustified indirect discrimination?)”*

As indicated above the qualifying criteria that is being proposed relates to only 3 years residency or six months employment. There are also a number of exceptions to the residency criteria and for this reason it is therefore not felt that the requirement will have a discriminatory effect.

Legal Opinion

The draft policy and Equality Impact Assessment and have been referred for legal opinion and the council has been advised in relation to the residency requirement that the exceptions currently identified in the draft policy may not be sufficient and that consideration should be given to include criteria which allows persons with a strong local connection to still qualify for housing allocation. Guidance indicates that this could be framed in terms of strong family association whether by residence or employment of close family members in the area that meets the residence or employment threshold in the policy.

The council has also been advised to consider the inclusion of a general special circumstances exception to the 3 year residence qualifications requirement in the policy which could be referred to the Housing Needs Panel for consideration and decision.



3 year residence criteria and persons with learning disability and guidelines on Ordinary Residence of People in Need of Community Care Services

The general issue discussed in the above guidance relates to questions, issues and advice relating to ordinary residence and responsibility of social services authorities in providing care and care packages to persons in need of care residing in their area under the various care statutes that set out and determine the extent of their duties to provide care to persons.

The issue that arises in relation to persons receiving care in CBC's area is that - it is not clear from the policy as drafted - that such persons will not be required to comply with the 3 year residence requirement in the event that they apply for housing assistance as part of, or separate from, their application to social services for care assistance.

The draft policy makes exceptions from the 3 year residence qualification criteria for a variety of persons including those arising from Multi-Agency Public Protection Arrangements (MAPPA), Multi-Agency Risk Assessment Conferences (MARAC), persons giving care to family member, a looked after child etc. It has therefore been suggested that the issue can easily be dealt with by the express inclusion of persons in receipt of care packages assessed and provided by social services in CBC's area in the list of exceptions to the 3 year residence qualification criteria.

2.5. To what extent do current procedures and working practices address the above issues and help to promote equality of opportunity?

1) Quota Schemes

The Council may choose to make a percentage of annual lets available to certain groups of applicants, via quota schemes. Where this is the case, these will be set out in an Annual Lettings Plan. Groups likely to be subject to a quota include:

- Clients with mental health issues, but ready to move on from supported housing schemes
- Clients with learning disabilities, but ready to move on from supported housing schemes
- Others to be identified as part of consultation with partner agencies

These quotas will be available to the designated service to nominate as a minimum number of properties available for that client group.

2) Applicants with a History of Poor Behaviour

The Council does not allow access to the housing register to those applicants with a history of bad behaviour. This includes any applicant, partner or other member of their household who has been convicted of, or had legal action taken against them for violence, racial harassment, threatening behaviour, any physical or verbal abuse towards staff and residents in the area. Legal action includes relevant convictions, service of injunction, notice of intention to seek possession, a court order or revocation of license to occupy.

Applications will be assessed on their own merits taking into account current and recent conduct along with any relevant supporting information provided by partner organisations, support workers and the Police.

Applications from people excluded under this section will need to demonstrate a change in behaviour. Usually, applications will be reconsidered after 12 months, during which time it must be demonstrated that there has been no repeat occurrence. Earlier reviews may be considered in exceptional circumstances, particularly where a household is engaging with support as part of the "troubled families" programme.

3) Applicants who owe debt to the Council

- The Council will consider whether the applicant still owes arrears/debt, and if they do, the extent of the arrears/debt. Procedures will guide staff decisions in this area.



- The Council will consider whether there are exceptional circumstances (see below). If there are exceptional circumstances then the applicant may not be subject to ineligibility despite the arrears/debt.
- The Council will consider whether the claimant has taken debt advice, acted on it, and entered into and begun to implement any arrangement to clear the arrears.
- The Council will consider whether an arrangement has been made, the amount of arrears paid off, any debt outstanding, and the regularity of any payments made.
- The Council is keen to only deem applicants ineligible where there has been willful refusal to pay debt.

Those who demonstrate that either they or their family face life threatening circumstances and as a consequence require immediate re-housing, including domestic violence cases, will still be admitted to the Housing Register. Applicants who have been deemed to be ineligible will be able to reapply after 12 months, when another assessment of circumstances will be made.

4) Exceptions to the local connection requirement. These are:

- A person who is serving in the regular forces or
- A person who has served in the regular forces within five years of the date of their application for an allocation of social housing under Part VI of the Housing Act 1996.
- In a class of people prescribed by regulation who cannot be deemed a non-qualifying person due to a lack of connection to one of the local authority areas. (for example MAPPA, MARAC, Witness Protection or owed a homelessness duty as a person fleeing Domestic Violence.)
- A 'looked after child' as defined by Children's Services in another region (suggest check wording with the Leaving Care Team at some point).
- Giving or receiving care to a member of the family and to be denied access to the housing register would be detrimental to this. The Council will only give access to the Housing Register to somebody where care and support are an issue if there is no one currently living with the applicant who can reasonably provide the support they need.
- Covered by previously agreed reciprocal arrangements with members of the Homefinder Partnership.
- Their residence in Central Bedfordshire has been broken due to placement in an institution or care placement or supported living scheme outside the area; and had this placement not occurred they would have satisfied the residence criteria set out above.
- Applying for sheltered housing
- Existing CBC tenant

5) Home Owners

Home owners will not qualify to join the Housing Register. However, the Council recognizes that a number of exceptional circumstances will exist where access to the Housing Register should be granted. These exceptional circumstances might include:

- When ownership is shared across more than one person/couple and the option to realise their assets to source their own housing solution is not available
- Households with insufficient equity in the property, so that once sold, they will not be able to resolve their own housing situation (use Bob Line's data here on equity limit?)
- An older person who needs sheltered accommodation or extra care accommodation
- A disabled person whose home is deemed unsuitable for adaptations
- Emergency medical reasons to move e.g. cannot be discharged from hospital.
- Where an applicant is fleeing domestic violence and the ownership of the matrimonial home is still in the hands of the court.

6) Right of Review

The Council will write to anyone who is being excluded from the Housing Register detailing the reasons for this decision. Applicants will have a right to ask for a review of this decision. A fresh application will be considered if:



- The applicants immigration status has changed
- The applicant can demonstrate good behaviour for a minimum of 12 months (see above)
- A minimum of 12 months has passed since the applicant has knowingly given false or misleading information, or withheld information that has been reasonable requested.
- The applicants financial circumstances have changed and income and capital assets reduced below the threshold

7) Assisting those Tenants affected by the Bedroom Tax

The Banding scheme has been designed to give priority to those tenants who need to transfer because they cannot afford to remain in their currently accommodation, because it is too large.

A quota may also be set for transfer applicants. This will enable applicants in housing need to transfer via the housing register – this is particularly important for those affected by the bedroom tax. New lets on new developments may also be set aside for transfer applicants as part of the quota arrangements.

8) Tackling Under - Occupation

Where existing social housing tenants wish to transfer to smaller accommodation, but still wish to retain a “spare bedroom”, they will be registered for a move and allowed to bid for one bedroom in excess of their assessed need. This only applies to tenants transferring to smaller accommodation.

9) Low Paid Workers

The Council wants to support low paid workers who are struggling to make ends meet in the private rented sector. Although these applicants do not attract reasonable preference within the Allocations Scheme, the Council is keen to see that a number of lets are made to these people who have resolved their housing need by renting privately. In order to qualify for this award, applicants shall meet the following conditions:

- Living in private rent accommodation in the area
- Be working
- Be on a low income

A low income is defined as earning less than the gross monthly wage needed in order to be able to afford the average rent for a 2 bedroom house in Central Bedfordshire. This means that a low income is less than £24 000 per annum (before tax), or £2 000 per month.

10) Where a property has specific adaptations (e.g. wheelchair access, ramps, level access shower), priority will be given to applicants who require the adaption in the property. Details of adaptations and criteria of applicants who will be given preference will be contained in the advert to allow applicants to make an informed decision whether the adaptation is suitable for their needs

11) It is intended that applications for the Housing Register can only be made online. There will be a period of transition to this system during which paper forms will still be available. Applicants are encouraged to complete the online self-assessment followed by the online application form themselves. However, if completed at a Council Office, staff will be available to go through the form or online self-assessment to ensure that the required information is collected. Assistance for clients is also available through support providers if required. These workers will be trained by Council staff. Where necessary, home visits will be carried out to assist in completing application forms.

12) Bedroom Requirement. Overriding medical and welfare factors will be taken into account when determining any additional bedroom requirement. Guidance will be sought from a medical practitioner or involved professionals and a determination will be made by the Council on whether additional bedrooms are required.

13) People who need to live with someone in order to provide or to receive care or support.

Applicants can include a person on their application if they need to live with them in order to give or receive care or support. This may include a carer, if no one in the applicants immediate household is able



to provide that care. Applicants will need to explain on their application the reason why the additional person needs to live with them and demonstrate:-

- That they need to be supported or cared for and are dependent on this person (this may be for an elderly relative who requires care or an adult child who is still dependent on as they are in full time education).
- That other satisfactory arrangements cannot be made.
- That the arrangement is 'permanent'.
- The member of the household will need to be resident in the UK.

A carer is someone who, with or without payment, provides care and support to a partner, relative, friend or neighbour who would not manage without their help. This could be due to age, physical or mental health, addiction, or disability. In all cases the carer must have been identified by the applicant as the person who is primarily responsible for providing them with care and the need to live with them or near them.

Even if a carer is in receipt of Carer's Allowance this does not necessarily mean that it is necessary for them to reside with the person who is being cared for. An application to include a carer in a housing application will be considered if the carer has been assessed by Adult Social Care as needing to provide overnight support. In these circumstances the applicant must provide supporting evidence from other agencies e.g. Adult Social Care.

14) In exceptional circumstances the Council, delegated as appropriate, may exercise discretion in deviating from the Bedroom Standard. Examples are:

- Where applicants require larger accommodation on health grounds. This will be considered on a case by case basis, taking into account the advice of a qualified medical advisor.
- Where the applicant has been approved as a foster carer by Children's Services, and so will need a larger property than normally required by the household. Children Services in discussion with the housing Service will determine the property size required.
- Where the applicant or a member of the household needs the support of a carer who will need to sleep in the home and cannot reasonably be expected to share a bedroom with another member of the household

15) Where an applicant has difficulty placing bids, help and advice is available from the Lettings team.

Allocation Policy Consultation Process

CBC formally consulted on its draft Housing Allocations Policy for 12 weeks from 4th November 2013 to 31st January 2014.

Each of Central Bedfordshire's housing 1500+ applicants on bands C and D (medium need and low/no need), who may be impacted by a change in Allocations Policy, were written to individually to provide notice of the formal consultation and to provide information about they could respond to the consultation.

The formal consultation was managed via a formal consultation document. This was available in paper format; downloadable from the CBC website, or was obtainable by telephoning or writing to the contact details provided in the letters to housing applicants.

CBC staff and elected members were informed about the formal consultation, social media was utilised and press releases were issued to the media to raise awareness of the consultation with Central Bedfordshire residents.

As part of the consultation process for the proposed Housing Allocations Policy the Interim Lead Officer for Housing Needs, representatives from the Housing Register Team and the Senior Estates Officer discussed the proposed Allocations Policy and provided additional qualitative feedback.



<p>In total, 102 people responded to the draft Housing Allocations Policy formal consultation.</p> <p>25% of respondents were housing register applicants, 16% were council or Housing Association tenants, 6% were from Town or Parish Councils, 10% were professionals, 16% were recorded as “other” and 17% did not include this information</p>
<p>2.6. Are there any gaps in data or consultation findings</p>
<p>2.7. What action will be taken to obtain this information?</p>

Stage 3 - Providing an overview of impacts and potential discrimination.

Stage 3 – Assessing Positive & Negative Impacts To be updated following consultation

Analysis of Impacts	Impact?		Discrimination?		Summary of impacts and reasons
	(+ve)	(- ve)	YES	NO	
3.1 Age					The development of a register related to older people and sheltered housing is likely to have a positive impact. Some young people can experience greater barriers to employment
3.2 Disability					Disabled people can experience greater barriers to employment
3.3 Carers					The policy includes consideration of moves of home that may be required during to caring responsibilities
3.4 Gender					No adverse impacts identified
Reassignment					
3.5 Pregnancy & Maternity					Pregnant and new / nursing mothers can experience greater barriers to employment.
3.6 Race					Some people from BME groups can experience barriers to employment
3.7 Religion / Belief					
3.8 Sex					Single Parents with young children can experience greater barriers to employment
3.9 Sexual Orientation					No adverse impacts identified
3.10 Other e.g. Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion					<p>People with lower level skills can experience greater barriers to employment</p> <p>The cost and provision of public transport and childcare remains a significant barrier for residents</p>



Marriage and Civil Partnership					accessing the local labour market
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Stage 4 - Identifying mitigating actions that can be taken to address adverse impacts.

Stage 4 – Conclusions, Recommendations and Action Planning

4.1 What are the main conclusions and recommendations from the assessment?

Conclusion:

The draft policy includes a number of positive provisions for vulnerable groups for example in relation to disability, domestic violence, carers, looked after children, foster carers, helping people escape the bedroom tax, helping low paid workers who may have families and be living in poverty etc.

Additional changes have been identified below to strengthen this approach.

It is recommended that further consideration is given to the provisions which may have an adverse impact on groups of people that find it much harder to access employment, *such as women (especially mothers whether they are single or partnered), pregnant and new / nursing mothers, disabled people and certain BME / religious groups* as this could potentially amount to indirect discrimination. This would need to be objectively justified in accordance with the requirements of the Equality Act, or mitigating actions need to be identified to minimise the degree of adverse impact.

Objective Justification:

The findings of the Hills Review have highlighted that the employment rates of those living in social housing with particular disadvantages or with multiple disadvantages are substantially lower than those of people with similar disadvantages but living in other tenures. The Hills Review also highlighted evidence that current allocations policies can create concentrations of poverty which can have a detrimental impact on both community cohesion and sustainability. With this in mind it would therefore seem to be a legitimate aim of the Council to provide an incentive for applicants to seek employment and to create a simpler system that closes any loophole or ability for applicants to chase additional priority by deliberately making their housing circumstances worse to give themselves an advantage over others.

Recognising the barriers that people can experience in finding work, the Council's Economic Growth, Skills and Regeneration Team has oversight of a variety of initiatives designed to help people find employment. These initiatives are set out in the All Age Skills Strategy. The Child Poverty Strategy also includes initiatives designed to help people access employment. Housing officers could have a key role to play in helping residents access these opportunities.

The introduction of the employment incentive does not mean that non working people will be unable to access housing. It is estimated that the impact will be that average wait times might increase from 40 weeks, for non working people – to a maximum of 60 weeks, whilst employed people are likely to average a wait of 20-25 weeks.

It would be advisable to monitor the policy closely during the early stages of implementation to check that the process is operating as fairly as possible. *The draft policy and Equality Impact Assessment have been referred for legal opinion which has confirmed that the council needs to ensure that employment initiatives are promoted and that the success rates are carefully monitored by protected characteristics.*

The council has also been advised in relation to the residency requirement that the exceptions currently identified in the draft policy may not be sufficient and that consideration should be given to include criteria



which allows persons with a strong local connection to still qualify for housing allocation. Guidance indicates that this could be framed in terms of strong family association whether by residence or employment of close family members in the area that meets the residence or employment threshold in the policy.

The council has also been advised to consider the inclusion of a general special circumstances exception to the 3 year residence qualifications requirement in the policy which could be referred to the Housing Needs Panel for consideration and decision.

The legal opinion has also suggested the express inclusion of persons in receipt of care packages assessed and provided by social services in CBC's area in the list of exceptions to the 3 year residence qualification criteria.

4.2 What changes will be made to address or mitigate any adverse impacts that have been identified?

The **harassment** reference in the section relating to applicants with a poor history of behaviour has been changed to incorporate all types of harassment under the Equality Act.

The Council will provide **advice and assistance to applicants who are not working**, on seeking employment. Staff will be trained to effectively signpost applicants to training and employment services. It is anticipated that in time there will be considerable joint working between housing and employment services in order to help lift people into work –

The Council will use the following **definition of working** households:

- Applicants who are in paid employment for more than 16 hours a week and have been in employment for at least 3 months
- Applicants who are self employed and have been for at least 3 months

Under the requirements of job seekers allowance, the DWP, recognizing the substantial barriers to employment that exist, does not expect single parents to be actively looking for work until their child is age 5. It is recommended that consideration of this type of approach is built into the allocation policy.

It is recommended that the proposal not to extend the employment priority to people who are undertaking training or volunteering be re-considered as these activities are important both in terms of self improvement and helping people access employment. The lack of inclusion provides a potential disincentive to engage in such activities that are most likely to lead to employment.

Following consultation the policy has been updated to include consideration of volunteering.

Where an applicant or their partner is **providing full time care** (35 hours or more per week) to an elderly resident or disabled child and is in receipt of full carer's allowance (except where carer's allowance is not payable because of the age of the carer or other benefit restriction – evidence will be required to prove the applicant's status in this regard), this will be considered to be employment

Disabled applicants under retirement age who have been assessed as eligible for Support Element of the Employment Support Allowance due to their permanent disability which prevents them from participating in work related activities, will receive the employment priority.

When an application is cancelled, an applicant will be notified of this in writing. A right of **review** will be offered, so the applicant can challenge the decision if he / she believes it to be unjust.

Applicants seeking adapted properties will also be able to bid for properties that are generally advertised, where they believe that properties would be suitable. Officers on short-listing will make an assessment on suitability for adaptation, assisted by an Occupational Therapist as required.



4.3 Are there any budgetary implications?			
4.4 Actions to be taken to mitigate against any adverse impacts:			
Action	Lead Officer	Date	Priority
More detail would be helpful in terms of identifying the support that is available and success rates in relation to securing employment.			
Work with local partners to ensure that access to employment schemes are actively promoted and implemented so as to mitigate and eliminate any potential impact in relation to protected characteristics			
Record the success rates of the various access to employment schemes with regard to persons with protected characteristics.			
Carefully monitor the implementation of the policy and the effect on applicants with protected characteristics in order to evaluate the actual impact of the policy			
Review expectation that single parents under 5 must be in employment.			
Consider potential disincentive effect of disregarding engagement in training or volunteering activities.			
Data analysis relating to existing allocations and then forecasts of how we think this might change under the new policy will be needed in order to understand potential impact			
Review policy to consider inclusion of strong family association criteria whether by residence or employment of close family members in the area that meets the residence or employment threshold in the policy.			
Consider inclusion of a general special circumstances exception to the 3 year residence qualifications requirement			
Consider express inclusion of persons in receipt of care packages assessed and provided by social services in CBC's area in the list of exceptions to the 3 year residence qualification criteria.			

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Stage 5 - Checking that all the relevant issues and mitigating actions have been identified

Stage 5 – Quality Assurance & Scrutiny:
Checking that all the relevant issues have been identified
5.1 What methods have been used to gain feedback on the main issues raised in the assessment?
Step 1:
Has the Corporate Policy Advisor (Equality & Diversity) reviewed this assessment and provided feedback? Yes
Summary of CPA's comments:



Whilst there are a lot of positives in the policy for vulnerable groups for example in relation to disability, domestic violence, carers, looked after children, foster carers, helping people escape the bedroom tax, helping low paid workers who may have families and be living in poverty etc, there were some aspects that I think we need to give careful consideration.

1) The main issue that stands out is the priority that will be given to people who are in employment. There is a real risk of indirect discrimination against certain groups with protected characteristics unless we can put in place some really effective mitigating actions. There is longstanding, as well as new and emerging evidence which demonstrates that women (especially mothers whether they are single or partnered), disabled people and certain BME / religious groups experience substantial and enduring barriers and discrimination in relation to employment. These are all groups of people who want to work but who find that the dynamics of the labour market is stacked against them.

Whilst it's positive to want people to seek employment, it would be advisable to show that the policy recognises that there is not an even playing field in the world of employment and that some groups may need a lot of help to access work and even when support has been provided some groups can be repeatedly overlooked by potential employers due to discriminatory attitudes. They may also not be able to work fulltime.

I would therefore recommend that the policy needs to be much more specific about the types of help and support we give these vulnerable groups and the degree of success these initiatives actually have in terms of getting people back into work.

I think we also need to be clear about whether applicants need to demonstrate they are seeking employment or if they have to show they have actually found employment. So for example how would we view someone who was going on skills/ confidence building courses in preparation for seeking employment?

Also, when we talk about employment do we mean fulltime employment or would we also consider part-time employment? If yes, how many hours would count? For many mothers and disabled people full-time work might not be a realistic possibility.

Will we also consider positively people who are doing voluntary work as a route back to employment?

If we always give priority to working applicants, it means that more benefit claimants will be directed to the private sector for housing. Many private landlords are reluctant to take benefit claimants. This issue could increase under Universal Credit because housing payments will no longer go direct to landlords. Will this mean that people on benefits will find it increasingly hard to access any type of property and will they be homeless as a result?

2) Letting Adapted Properties. I think we need to be very careful about restricting applicants with mobility difficulties to properties that only match their assessed need. This would be ok if we had a very high supply of such properties but I don't think we do. The effect of such a criteria will be that disabled people have to wait much longer for an appropriate property. This risks breaching human rights legislation:

Duty to take positive action to secure physical integrity and dignity

Where a local authority knew that a severely disabled tenant's housing was inappropriate and prevented her from having a normal family life but did not move her to suitably adapted accommodation, they failed in their duty to take positive steps to enable her and her family to lead as normal a family life as possible and secure her physical integrity and dignity. Damages were due for this failure. R (Bernard) v Enfield [2002] EWHC 2282 Admin

3) Housing Needs Panel - no appeal process is that fair?

4) Failure to engage in bidding process will lead to removal from register. Will we have robust processes in place to check that the lack of engagement isn't down to some type of vulnerability?

5) Shortlisting by Priority Date - first come first served. A vulnerable person may need to enlist the help of an advocate / carer. This could slow things down for them in terms of lodging their application and so they could miss out on a property. Is this fair?



- 6) Only 24 hours to respond to contact** from the council. Again is this fair and realistic for some vulnerable groups who need support? What if someone is ill / in hospital?
- 7) Failure to attend an arranged accompanied viewing** will be treated as a refusal. Again what if someone is ill / in hospital, is this fair?
- 8) Section 11 Equality and Diversity** - This needs to be updated to reflect the correct list of protected characteristics - age disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation
- 9) History of poor behaviour** - (page 13) we only mention one type of harassment which is racial. We need to make it clear that harassment related to any of the protected characteristics is unacceptable.
- 10) Data Protection** - we need to ensure that equality data is collected so that we establish the extent to which fair access to appropriate housing is being provided.

11) Data Analysis - data relating to existing allocations and then forecasts of how we think this might change under the new policy will be needed. For example if we are saying that in future 60% of lets will go to people on the general housing needs register in a year how does this differ to the current position and what will the impact be? Does it mean people in this category will have to wait longer to be allocated housing or will they be directed to the private sector? What impact will this have on them? What are the characteristics of people in this category.

In relation to local priorities, do we know for example what level of demand we might experience from low paid workers in the private sector? How many people in this position are currently allocated a home? Do these workers have children? If yes the inclusion of this priority in the Allocations Policy could have a very positive impact on child poverty and all the inequalities associated with that and therefore it could be argued that this helps justify the 60% cap on the general housing needs register.

If we don't have relevant data in some of these areas hopefully the consultation process can give us an insight into potential levels of future demand.

12) People earning a high salary – It may be advisable to also consider the outgoings that people have. For example someone can appear to have a high salary but may be having to pay significant child care costs in order to be able to go to work. This will mean that their actual level of disposable income is low

13) Equality Forum - I would recommend that the policy is considered by the Forum in September 2013.

14) It is intended that applications for the Housing Register can only be made online. It is vital that Council officers provide support to applicants who experience difficulty in meeting this requirement.

In a recent First-tier Tribunal Tax Chamber case it was held that HMRC regulations which require the electronic filing of VAT returns were discriminatory. Two of the appellants suffered from disabilities making it difficult or impossible for them to use a computer, and the third appellant lived in a remote area where there was unreliable or non-existent broadband access. The three appellants were of an age which made learning how to use a computer particularly difficult and they would have had to bear the expense of instructing an agent. The Tribunal, with Judge Barbara Mosedale presiding, held in a very detailed judgement that the regulations which require online filing of VAT returns, without providing an exemption for older people, people with disabilities and those who lived in areas which lacked broadband coverage, were in breach of the appellants' human rights and were unlawful under EU law.

Issued simultaneously was Judge Mosedale's decision in the case of *Graham and Abigail Blackburn, t/a Cornish Moorland Honey*. This was one of a smaller group of cases in which the objection to online filing was on religious grounds. In the Blackburn case, the Tribunal found that the appellants' Article 9 rights to freedom of thought, conscience and religion were breached by the application of regulations. Having heard Mr Blackburn's evidence, the Tribunal accepted that using a computer, or having an agent use it on their behalf, was contrary to Mr & Mrs Blackburn's religious beliefs. The religious society to which Mr and Mrs Blackburn belonged did not have beliefs which were "incompatible with the use of electronic communications" and therefore on a straightforward reading of the regulations, the appellants did not fall within the stated exemption. However, the Tribunal found that the requirement to file online restricted the



manifestation of the appellants' belief that they should "shun using computers" and that manifestation was in fulfilment of a duty imposed on them by their religion and/or was 'intimately linked' with their religion. The Tribunal concluded that it could read the regulations so as to give effect to them in a way which was compatible with the appellant's Convention rights and in so doing found that the exemptions applied and allowed the appeal.

Step 2:

5.2 Feedback from Central Bedfordshire Equality Forum – 26 September 2013

Members highlighted the following issues:

- Applicants with a history of poor behaviour – The definition of poor behaviour needs to be given careful consideration. Whilst recognising the need to protect residents, consideration should also be given to what happens to these applicants and how they are guided to improve their behaviour. Otherwise people can move from area to area causing problems. A flow chart would be helpful to outline processes that are in place / sources of support.
- Employment Priority – The experience of disabled people and barriers to employments was highlighted. Many disabled people who have been assessed as capable of working by ATOS and have appealed the decision, have been successful (2/3 appeals are upheld).
- Concern was also expressed about the numbers of people being forced to accept zero hours contracts
- Some London Boroughs have been successful in signposting people to employment opportunities via housing officers
- Manchester Council includes a housing priority related to volunteering – Many members of the Forum supported this principle and cited the valuable contribution that volunteering could make as a route into permanent employment. Many voluntary agencies require volunteers to sign a formal agreement and it was suggested that this could be used as evidence that an individual was involved in a genuine volunteering opportunity. However concern was also expressed that some unemployed individuals do not have sufficient skills to be an effective volunteer.
- Applicants who owe debt – It was suggested that consideration should be given to the steps that people are taking to repay their debts. Debt is increasing significantly among working families.

5.3 Feedback From Central Bedfordshire Child Poverty Meeting – 10 September 2013

Attendees at the meeting expressed the following views:

- Debt Criteria – Would it be possible to change the criteria so that people who are making a real effort to repay debts such as Council Tax are eligible for consideration?
- History of Poor Behaviour – This needs to include consideration of when the poor behaviour happened. An event many years in the past should not be included as relevant if current behaviour has improved. Perhaps a time frame could be built into this.
- Women Escaping Domestic Violence - could they be included in the quota.
- Prioritisation according to date order – no concerns were raised in relation to this
- Employment Priority – concern was expressed that this would mean that the most vulnerable families would be left in the worst housing and that children under 5 would not be given a good start in life. This appears to be contrary to the Council's Poverty Strategy. Local research indicates that there is a shortage of childcare places and that women who are aged 20+ are finding it much harder than men to access employment due to barriers such as lack of affordable child care. Could an exclusion be considered for families with children under 5?
- Participation in Volunteering / training as routes back to work – could this be considered?
- Self employment – the revenues and benefits team have seen a substantial growth in people who are registering as self employed and who are engaged in activities that take up many hours (e.g. 70 per week) for little or no pay. Registering as self employed does however have the positive impact of excluding someone from the benefits cap and seeking self employment is actively encouraged by the Government. The R&B team has had to take on more staff to consider applications from self employed people. Will more people register as self employed to gain a housing priority? Will this increase the complexity of administering the policy and what impact will this have on staffing levels



within the council?

- £40k cut off – may provide a perverse incentive for families to seek lower paid jobs
- Consideration should be given to the needs of single people who may be vulnerable due to disability such as a mental health issue. Whilst it may not be severe it may still impact adversely on someone’s ability to access employment and under this proposed policy will impact on their ability to access a more secure housing option.

The Group asked if the Equality Impact Assessment could be presented to the next meeting on 10 December 2013.

Feedback From Central Bedfordshire Child Poverty Meeting – 10 December 2013

Kirsty Jenkins provided a further update on the draft policy and consultation process. Clare Harding introduced the Equality Impact Assessment and highlighted the key issues that were being identified.

- Discussion around “Voluntary Contract / Formal Agreement” definitions of voluntary, contract and threshold of hours must be defined. Joe Richardson (Job Centre Plus) confirmed that ‘Voluntary work’ is used as a pathway to employment. Need to understand exclusions and suggestions around assisting certain groups.
- LB to ensure VOC are aware CH to send through examples of volunteering agreements provided by members of the Equality Forum via VCI for circulation.

Kirsty Jenkins encouraged attendees to respond to the online consultation.

Stage 6 - Ensuring that the actual impact of proposals are monitored over time.

Stage 6 – Monitoring Future Impact	
6.1	How will implementation of the actions be monitored?
6.2	What sort of data will be collected and how often will it be analysed?
6.3	How often will the proposal be reviewed?
6.4	Who will be responsible for this?
6.5	How have the actions from this assessment been incorporated into the proposal?

Stage 7 - Finalising the assessment.

Stage 7 – Accountability / Signing Off	
7.1	Has the lead Assistant Director/Head of Service been notified of the outcome of the assessment



Name: _____ Date: _____
7.2 Has the Corporate Policy Adviser Equality & Diversity provided confirmation that the Assessment is complete?
Date: _____

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SCH&H O&S
12th May 2014



**Housing Revenue Account
(HRA) 2014/15 – 2019/20**

**Housing Service
Investment Plan**



Investment potential

– circa £150m over 30 years, plus finance the Council can leverage

Scope to invest – developing a strategic Investment Plan

- Tenant/leaseholder benefit – improvements, tenant aspiration
- Build new homes, meet housing need (e.g. children leaving care)
- Regeneration impact – e.g. Pride of Place, estate improvement
- Asset Management Strategy (resolve problems)
- Economic boost
- Support the Council's efficiency programme
- Respond to demographic change (e.g. accessible homes)
- Environmental agenda – e.g. Fuel poverty



Resources to deliver the Housing Service Investment Plan

- Business Plan forecasts annual surpluses of £6m - £8m (after interest payments) for 6 years
- Estimated £48m available up to 2017/18, £56m to 2019/20 (after debt repayment of £15m)
- Estimated £14m needed for Priory View (2014-2015)
- This would leave £34m available (4 yrs), £42m (6 yrs)
- Business Plan intention is to repay debt of £165m over 30 years
- “Additional” investment potential is approximately **£150m after debt repayment of £165m** over 30 years (estimated range between £136m to £168m, depending on variables such as interest rates)
 - “additional” is an amount over/above the minimum level of investment in the existing stock, that is necessary to maintain homes in good condition
 - from an asset management perspective, “investment” decisions are sophisticated, when considering the existing stock and new opportunities

Loan Portfolio, Debt Strategy, Right to Buy sales

- Self Financing Debt - £165m (73% fixed, 27% variable)
- Interest payments for 13/14 of £4m (average rate 2.40%)
- Interest rate rises on the horizon?
- A 2% increase equates to £900k extra cost per year
- Fixed rate debt - £120m – matures between 2024 – 2034
- Proposal – principal repayment (forecast at £6.3m) in 2017/18 (forecast repayment of £15m by 2019/20)
- Right to Buy (RtB) sales receipts
 - “1 for 1” receipts must be used or they go back to Government (if not spent within 3 years)
 - increase in RtB sales from 7 in 2011/12 to 30 in 2013/14
 - £2.3m balance of retained receipts as at 31.03.14 (£1.1m for “1 for 1” replacements)

Balanced approach to investment planning

- Not done this before – walk before we run – learning from partners
- Spend wisely: the Council has a great deal of money (strategic plan)
- Opportunity led – want to make a difference now
- “Bite sized chunks” (although Priory View is a large chunk)
- Land is constrained (supply of low value land)
- Delivery structure/model – aligned to a programme we can sustain
- Opportunity to work closely with Aragon and Aldwyck and are doing so
 - e.g. Greenfields in Leighton Buzzard
 - a third extra care scheme in Biggleswade

Council will invest in all wards.

Initial programme is dominated by opportunities in the south of Central Bedfordshire

Scope of the O&S discussion

Today – an overview of what the Housing Service is working on
Grand Union will present on planned investment (north of Central Bedfordshire)
Detailed proposals will be presented for approval at Executive

2014/15 (likely to seek approval soon for)

- Croft Green, Dunstable – a sheltered scheme, 26 units
- Creasey Park, Dunstable – a garage site, 4 units

Questions – scope for discussion

- Scope of the programme as a whole.
- Should the Housing Service adopt a balanced approach or be more single focussed in some areas – e.g. New build on green-field sites?
- “Golden rules” are proposed: what do you think?
- Opportunities within Central Bedfordshire – your views?

Constraints

Land

- i.e. economic sites – low value land
- Major sites are constrained due to viability (development economics)
- Grand Union are similarly constrained

Delivery model (i.e. Capacity, expertise, partnership, ambition)

Council has not developed previously. Priory View is a learning curve

Several options, ranging from –

- “in house” team
- Joint venture, Special Purpose Vehicle, Trading Company
- Contract with a specialist provider of “development expertise”
- Important that the model enables the Investment Plan to be delivered
- Intention is to twin track initial investment programme using existing capacity/approach, whilst developing a new vehicle/model.

Homes & Communities Agency (and Partners)

- Housing Service has achieved partner status with HCA
- HCA Grant secured – Priory View £1.7m
- Competitive Grant Bids about to go in ... 3rd extra care scheme
- G&T sites are not HRA funded, but are part of the Investment Plan
 - Grant Bid of £1.9m for proposed extension of Potton site (13 new plots) and new site at Dunton Lane (12 new plots)

Developing a stronger relationship with the HCA. Important –

- To consider how the Council can leverage finance
- How we can make best use of s106 (affordable housing) resource
- How we can enable partners to invest in Central Bedfordshire
- Maximise our opportunity of Development Status
- Contribute to wider development initiatives – strategic partnerships

‘Golden Rules’ – principles to guide investment

- Win/win/win approach:
 - Overall, the proposed scheme is a sound investment
 - A problem is solved – e.g. blighted garage site
 - Delivers savings to the General Fund
- Investment Plan flexibility: informal status, keep options open
- Active involvement of tenants (Tenant Investment Panel)
- Balance investment potential against the choice to repay debt
- New build projects should not be undertaken at the expense of maintaining and managing the existing assets
- New build in all Central Bedfordshire wards (with tenant support)

Tenant Investment Panel (TIP)

- The Panel has informal status – newly formed as part of the budget process for this year. TIP is not part of the process for approval of capital expenditure.
- Intend to consult on specific proposals, as they are being developed, as well as to consult with tenants who are directly involved
- Important to understand choices between investment in the existing stock (improve homes, deliver customer benefit, resolve problems) against strategic objectives – e.g. regeneration, meet housing need
- Always looking for the “..win, win ..” – e.g. fuel poverty initiatives
- Important to develop a common understanding of the debate, the choices and the rationale for decisions
 - e.g. on what basis do you value tenant benefit, when compared to strategic objectives (benefits)?
- Tenants have identified a key issue as being parking provision

Options for investment: where to invest?

- New build on green-field sites – lowest cost per unit, s106 sites
- Extra Care Housing
 - Priory View (now),
 - 3rd extra scheme in Central Bedfordshire, after Greenfields & Priory View
- Environmental/Estate Improvements (e.g. parking)
- Purchase/repair/dispose of empty homes that blight neighbourhoods
- Regeneration of existing sites in the HRA portfolio (e.g. garage sites)
 - Creasy Park, Dunstable is the first of these being worked up
 - Major regeneration schemes
- Remodelling (with new units) of existing Sheltered Housing (Croft Green)
- Capital receipts – use or lose

Prory View, Dunstable – 83 new council homes



Greenfields, Leighton Buzzard (Aldwyck)



Sheltered Housing Review

Modernisation of some sheltered schemes is a key area of investment Standards agreed, engaging with each scheme over the summer to consider the implications, when Standards are applied to each scheme

Detailed discussion: with each scheme

- Some – major refurbishment
- Some – relatively small scale investment
- Some – de-designate

Toddington, Crescent Court – Council commitment to re-provide accommodation for older people – Neighbourhood Planning process

Dunstable, Croft Green





bedsit block hallway



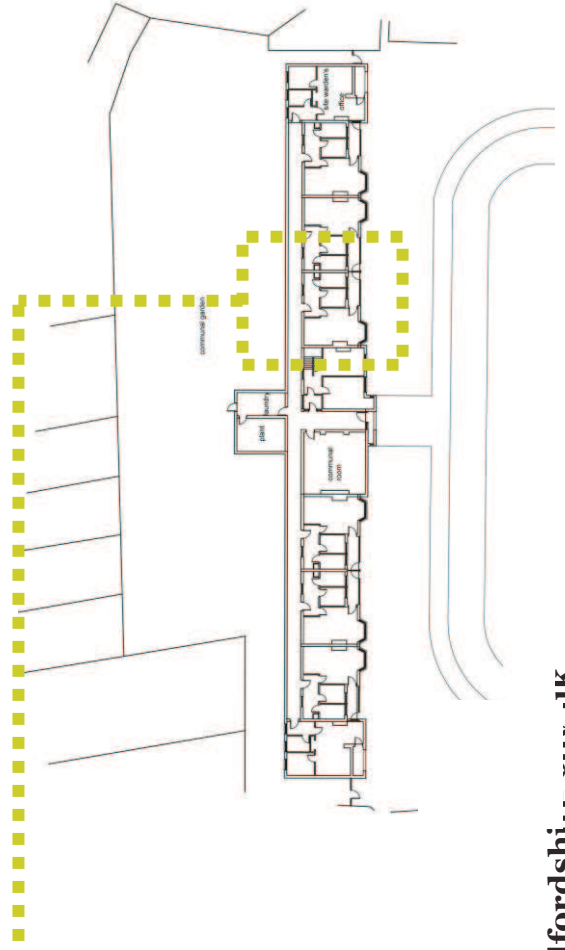
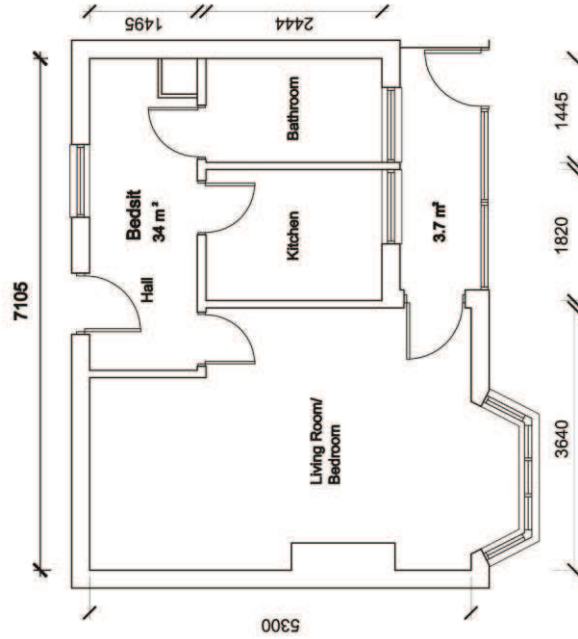
front entrance



kitchen



bathroom



Croft Green Redevelopment

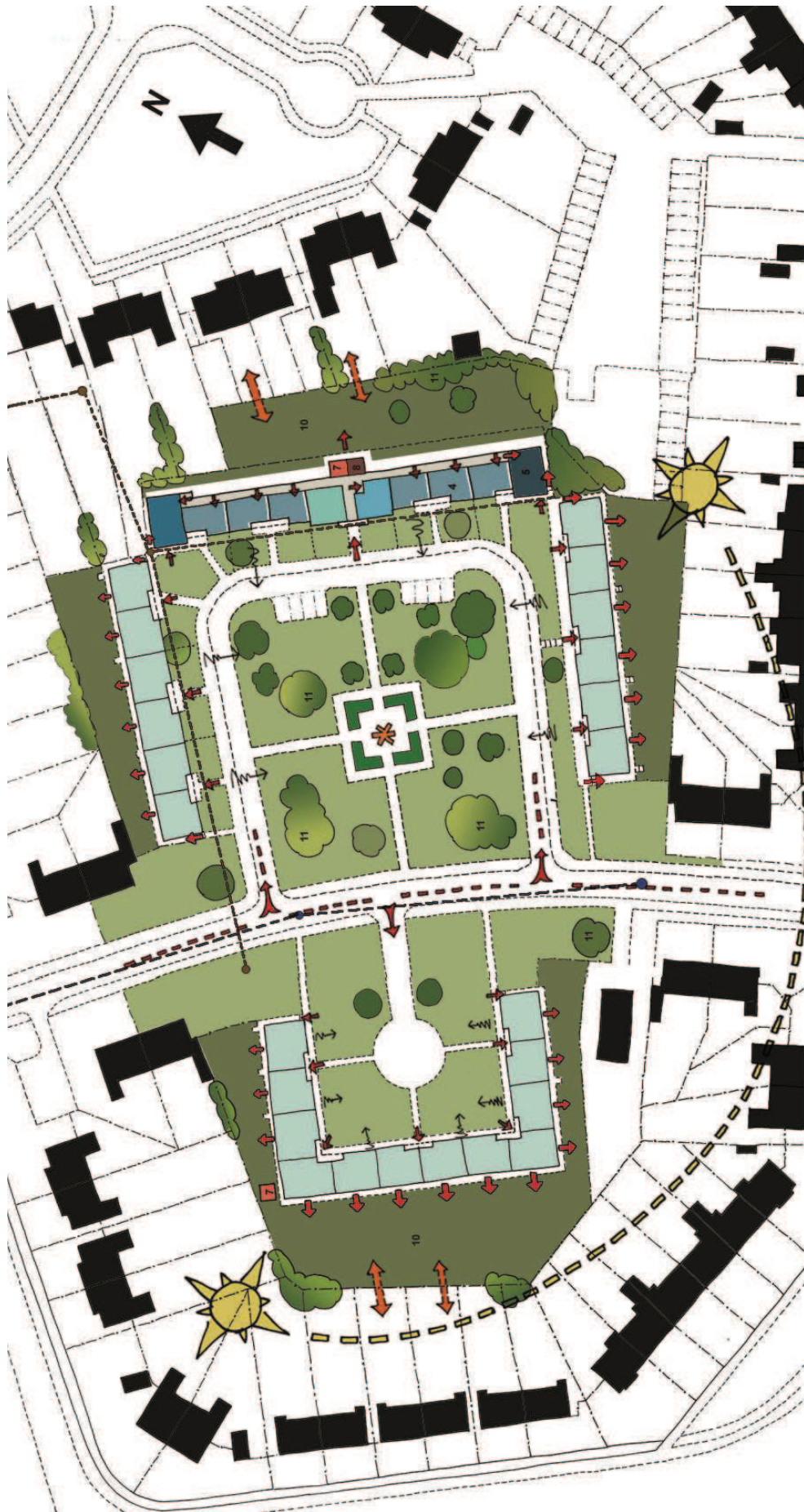
Bedsit Block Typical bedsit - Existing Plan

Not to scale Date: Sept 2009 Drawn by: DI



Croft Green, Dunstable
existing site constraints plan

not to scale
July 2009 drawn by: DI



Key

- 1. existing buildings
- 2. Croft Green green
- 3. bungalows
- 4. bedsits
- 5. warden's office
- 6. main access and garden access
- 7. plant room
- 8. communal kitchen and laundry room
- 9. communal room
- 10. communal gardens
- 11. existing trees
- 12. access into the site
- 13. surface water sewers
- 14. foul water sewers
- 15. back to back distances

Croft Green, Dunstable – 26 new flats



Empty homes

- Purchase, repair, return the property to the market as “improved”
- Idea is a £2m recyclable pot of money, so that the pot continues to be replenished from sales receipts (enabling there to be a continuous programme of empty homes)
- Objective – to see the property improved/occupied



Estate Improvement (Pride of Place)

Parking is a major issue on estates where the Council is the dominant landlord.

Many opportunities to achieve impact through works to improve the local environment.

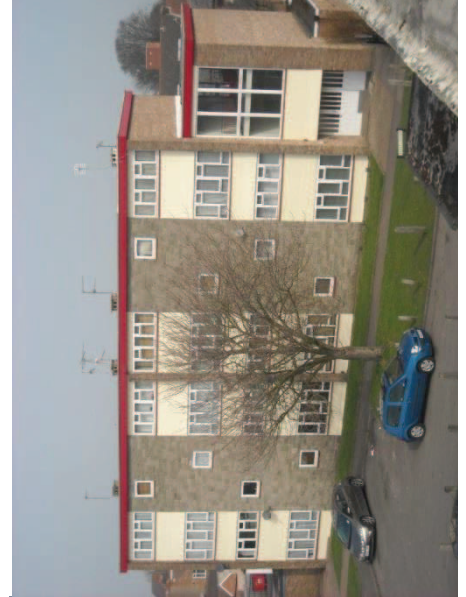
Opportunity to charge residents for parking spaces, to enable the Council to fund the investment to deliver parking schemes to benefit all residents.



Regeneration (Housing Asset Management Strategy)

Major areas to consider – appraisal work is underway

- Mayfield Road shops, Downside, Dunstable
- Sandland Close, Dunstable
- Union Street, Dunstable
- Broomhills Road, Leighton Buzzard



Garage Sites (regeneration)

Evaluation of the Council's 75 garage sites identified

- Development: 17 sites – potential for up to 98 units
- Repair & Maintain : 35 sites – profitable
- Alternative Use: 23 sites – not profitable (further work)

Evaluation criteria for development (seeking maximum overall benefit):

- current occupancy less than 40%,
- maximum of 10 buy backs per site, and
- minimum of 3 new units delivered

Work is part of the Investment Plan. Also part of a Garage/Parking Strategy

Creasey Park Drive, Dunstable



- No ownership constraints
- Capacity for 4 units
- Pre-application completed

Schedule of Accommodation

TYPE	BED	SIZE m ²	QUANTITY	
A	2B 3P Flat	65.9	1	1
B	2B 3P Flat (small)	77.1	1	1
H	2B 3P Bungalow	61.8	1	1
G	2B 3P Bungalow (small)	65.4	1	1
TOTAL			274.2	4



— Site Boundary



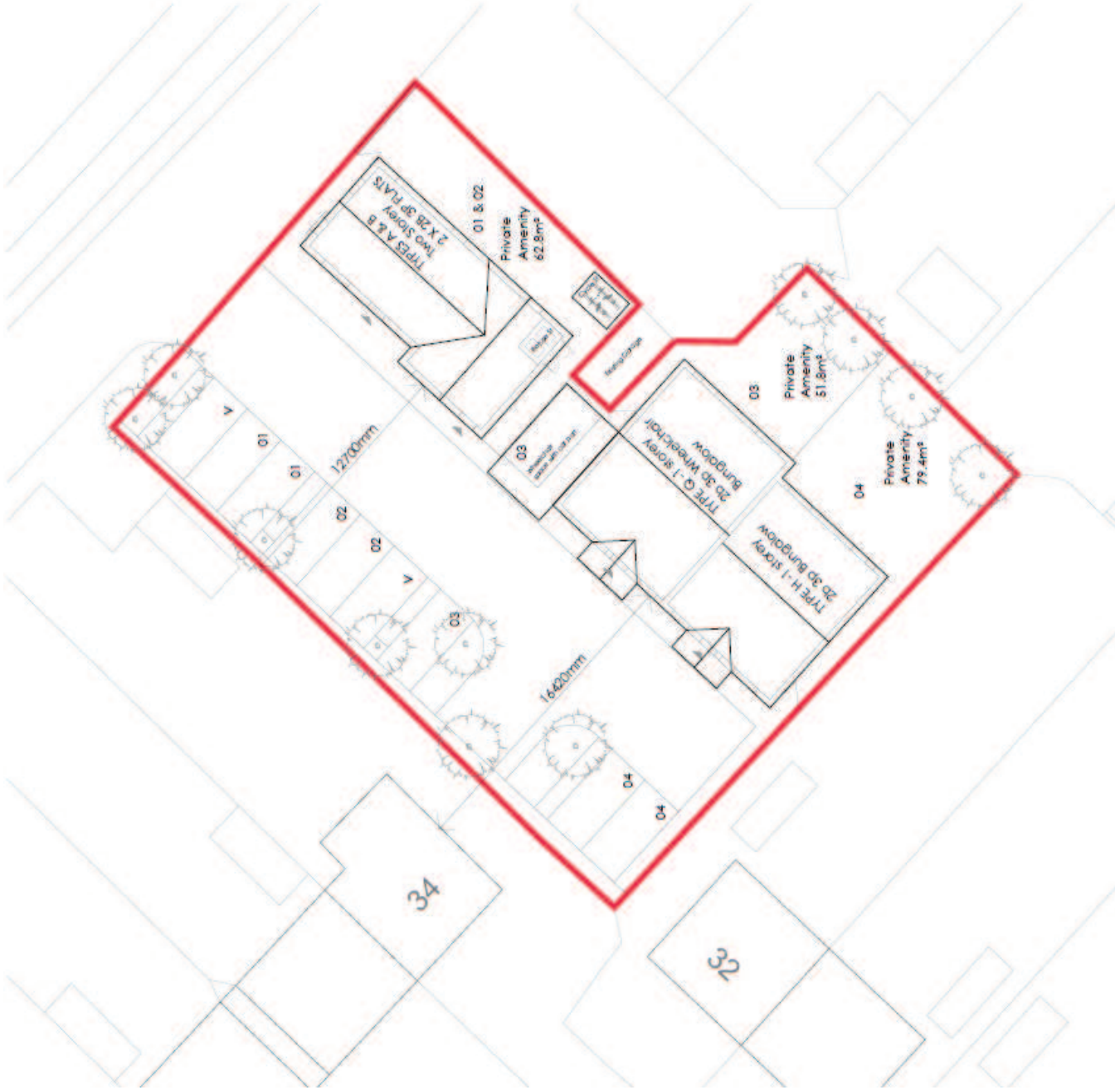
Subject to a full topographical survey and consultation with the LA Development Control



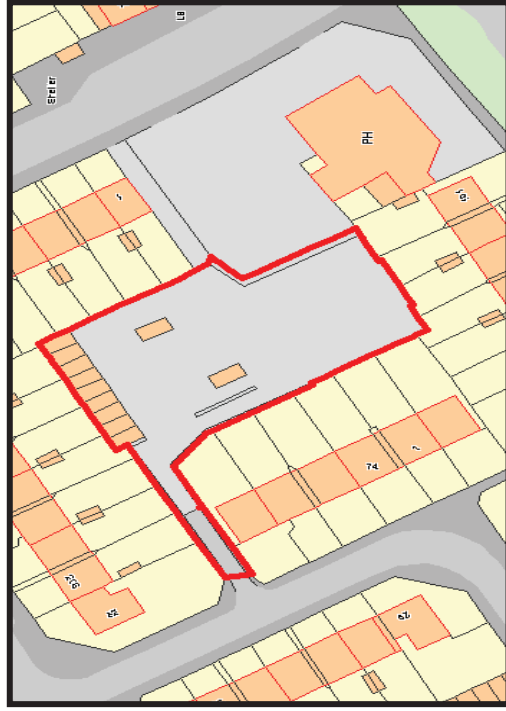
Creasey Park Drive
Dunstable

Indicative Site Layout
Option 04

1:2000 scale	22.07.13	JB	JCS	FEASIBILITY	52499	SK-404
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Sycamore Road, Houghton Regis



- 2 private interests
- Capacity for 6 units
- Opportunity to extend site
(adjacent pub)

Brewers Hill Road, Dunstable (1)



- 9 Private interests
- Capacity for 9 units
- Opportunity to extend site (as part of a wider approach to asset management that includes PRC homes)

Brewers Hill Road, Dunstable (2)



- 8 private interests
- Capacity for 8 units

Oakwood Avenue, Dunstable



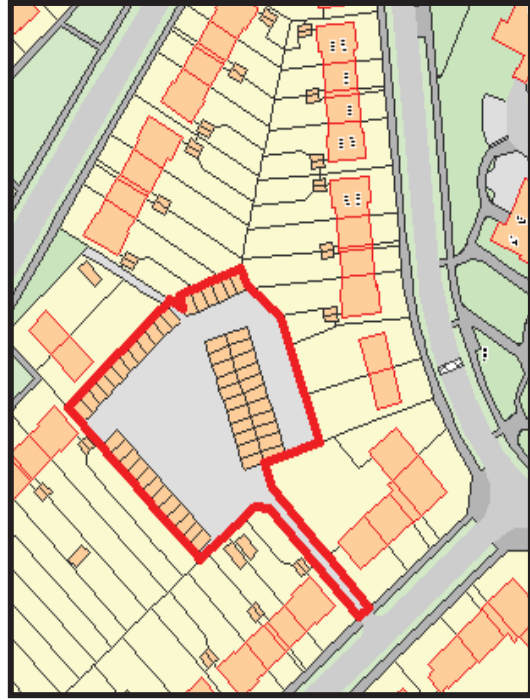
- 5 private interests
- Capacity for 8 units
- Likely to require innovative house-types
(site constraints)

Grove Road, Houghton Regis



- 5 private interests
- Capacity for 6 units

Brive Road, Dunstable



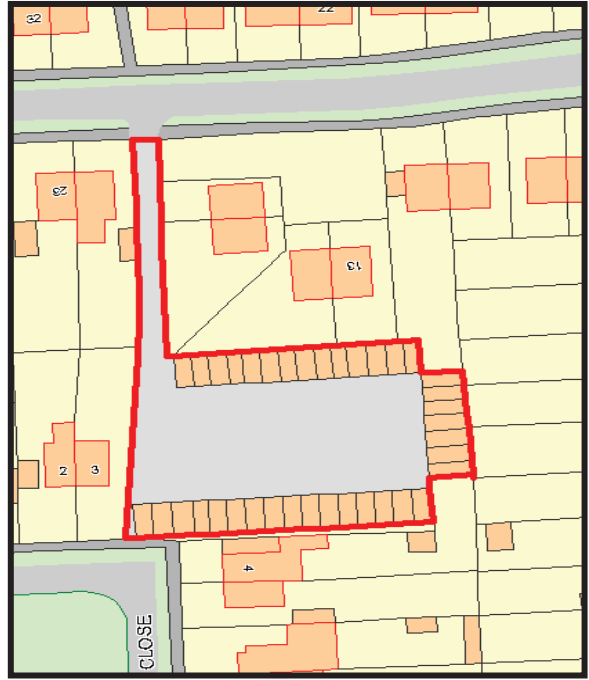
- 8 private interests
- Capacity for 10 units

Northfields, Dunstable



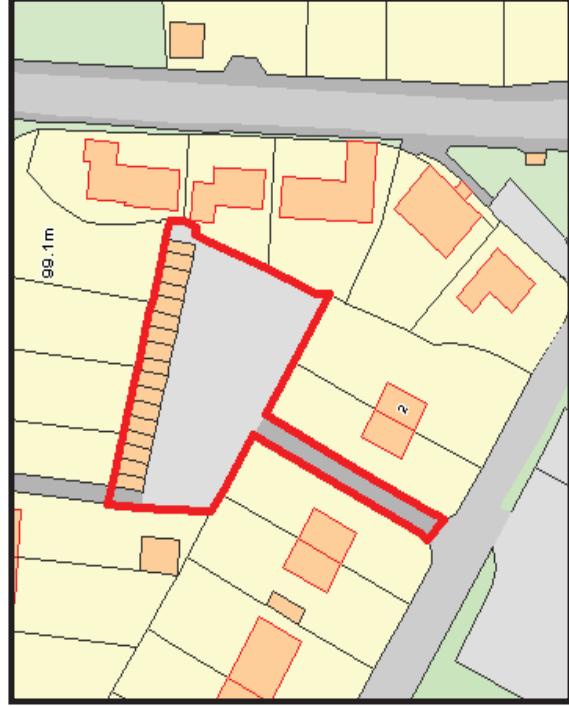
- 3 private interests
- Capacity for 4 units
- Opportunity to extend site
(neighbouring green space)

Osborn Road, Barton le Clay



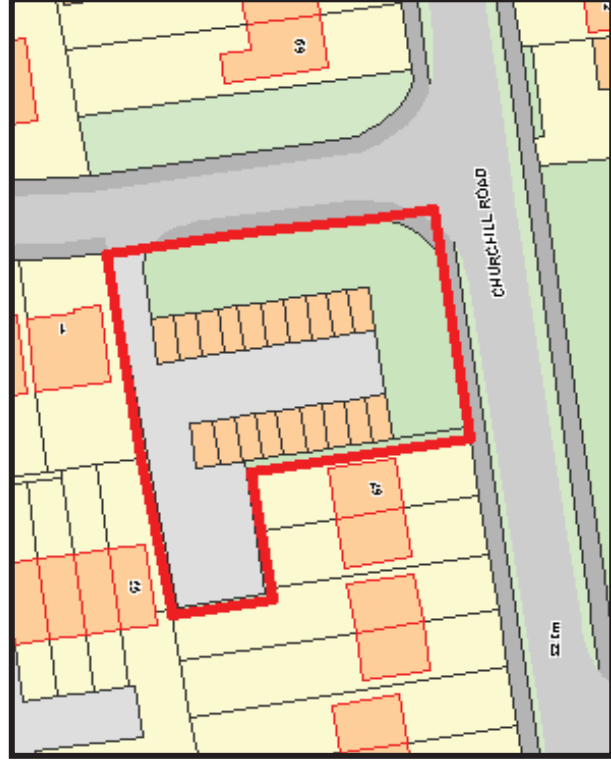
- 6 private interests
- Capacity for 7 units
- Opportunity to extend site (adjacent properties)

Park Lane, Eaton Bray



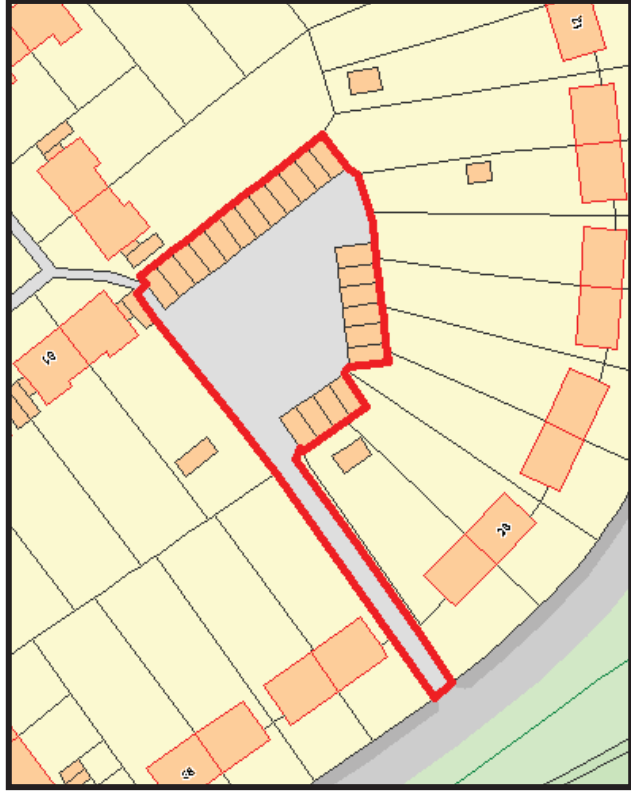
- 6 Private interests
- Capacity for 6 units
- Rights of way issues

Churchill Road, Leighton Buzzard



- 5 Private interests
- Capacity for 4 units
- Neighbours new development

Spinney Crescent, Dunstable



- 5 Private interests
- Capacity for 4 units

Kent Road, Houghton Regis

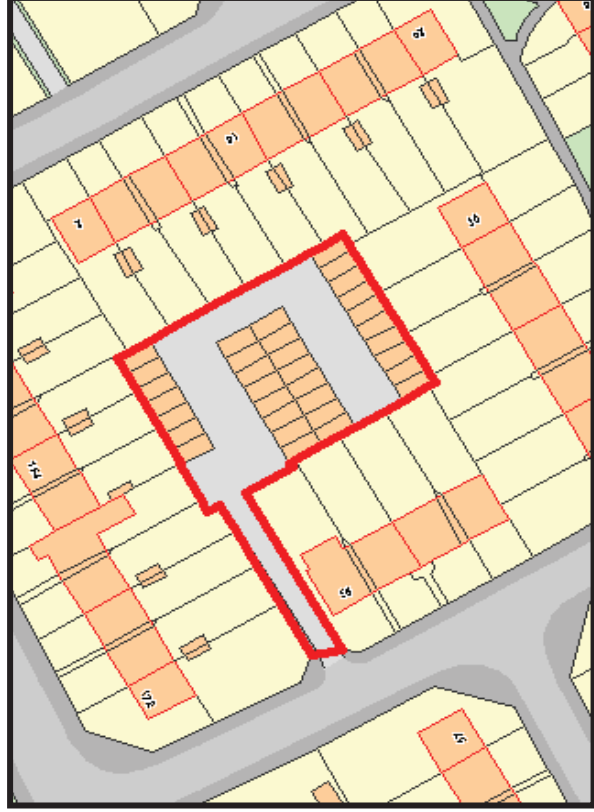


- 6 Private Interests
- Capacity for 5 units

Recreation Road, Houghton Regis



- 5 Private Interests
- Capacity for 4 units

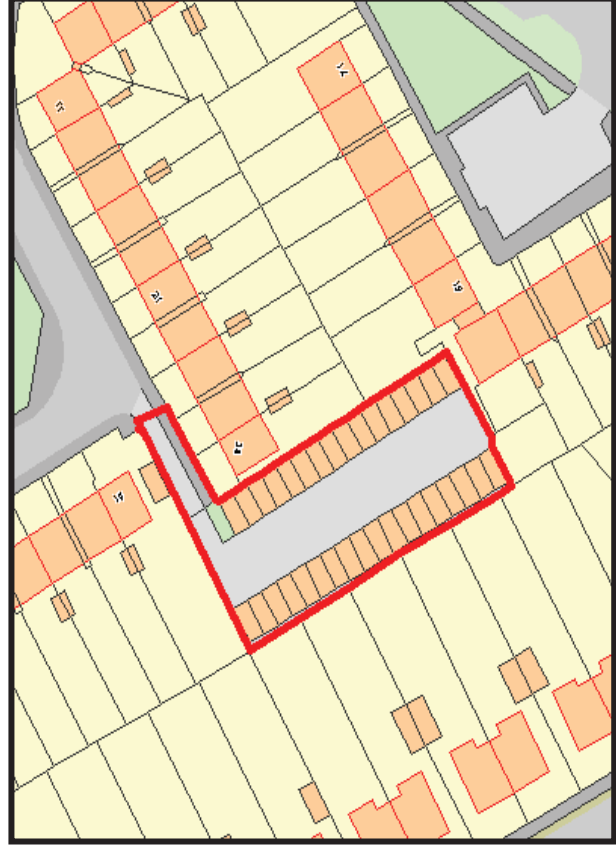


Mountview Avenue, Dunstable



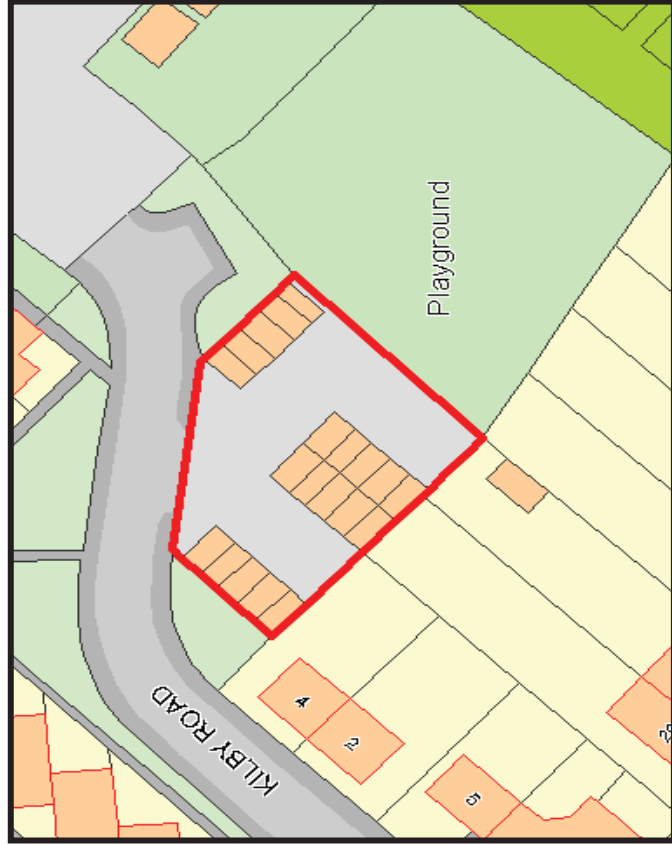
- 9 Private Interests
- Capacity for 6 units

Recreation Road, Houghton Regis (HR19)



- 7 Private Interests
- Capacity for 4 units

Kilby Road, Hockliffe



- 9 Private interests
- Capacity for 3 units
- Opportunity to extend site (adjacent land)

Economic development: cost benefit analysis

We have a choice as to how we construct a garage site development programme, that depends on the tenure mix and whether we take a whole value approach to the economic appraisal of the sites (i.e. value all the benefits)

Scenario (tenure mix)	Total No. Units Delivered	No. Affordable Units Delivered	Cumulative NPV
35 % Affordable Rent / 65% Shared Ownership	98	98	-£388,682
40 % Affordable Rent / 60% Shared Ownership	98	98	-£1,142,122
45 % Affordable Rent / 55% Shared Ownership	98	98	-£1,436,147
50% Affordable Rent / 50% Shared Ownership	98	98	-£1,334,700
33% Affordable Rent / 33% Shared Ownership / 33% Sale	98	64	-£336,714
35% Affordable Rent / 65% Sale	98	33	£180,123

Indicative 8 year programme – circa £16.6m (98 homes)

Year	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
Cost	£235,568	£2,966,449	£2,344,880	£2,359,595	£2,530,219	£2,397,594	£2,521,378	£1,202,073
No. Units	19	14	14	14	15	14	15	7

- The above is based on being able to acquire private interests in a reasonable time and for the currently assumed values.
- Inflation may lead to costs increasing.
- Sites may move forward or backward in the programme (along with their associated expenditure) depending on progress.
- Aim is to progress Creasey Park during 2014/15
- 19 finished units by end 2015/16 is a challenge

Extra Care housing

3rd and possibly a 4th scheme being progressed (2014/16)

Grant bid to the HCA for a Biggleswade scheme – £16m price tag (HCA grant bid £1.97m)

Preference is that partners deliver the expansion of extra care housing.

Housing Service to deliver where partners are not able to



How might the Investment Plan look? (£56m over 6 years)

Not including HCA grant etc, that could be secured. Or shared ownership sales values.

The proposal below is illustrative and does not neatly fit into a 6 year programme

	£m
• Priory View	14.0
• 3 rd extra care scheme	16.0
• Empty Homes	2.0 (recyclable pot)
• Greenfield development (new homes)	0.0
• Pride of Place improvements	1.5
• Regeneration (new build units, garage sites)	16.6
– Future decision as to how units are used	
– E.g. Specialist Young people; LD; MH	
• Sheltered (re-modelling, e.g. Croft Green)	6.0 (+ some new units)

Aim should be to leverage additional investment – e.g. HCA resources

Material points

North of Central Bedfordshire

- opportunity to invest in all Central Bedfordshire wards
- Important to have tenant support
- Important to align with partners’ plans and compliment what partners are doing

Balance

- Between short term (getting started) & putting in place a strategic plan
- Balance across the programme (“deliverables”), to make the best of opportunities, whilst working to a strategic plan (responding to strategic drivers)
- Taking the time to put in place an efficient (& ambitious) model for delivery
- Making some progress from which to learn, establish wider understanding, to enable the Housing Service Investment Plan to mature
- Be prepared to review, flex and modify the Investment Plan

Recommendations

Questions – scope for discussion

Scope of the programme as a whole.

Should the Housing Service adopt a balanced approach or be more single focussed in some areas – e.g. New build on green-field sites?

“Golden rules” to guide our investment approach: what do you think?

Opportunities for development within Central Bedfordshire – your views?

Meeting: Social Care Health and Housing Overview & Scrutiny Committee
Date: 12 May 2014
Subject: Work Programme & Executive Forward Plan
Report of: Chief Executive
Summary: The report provides Members with details of the currently drafted Committee work programme and the latest Executive Forward Plan in addition to details of a recent work programming session with partners.

Contact Officer: Paula Everitt, Scrutiny Officer

Public/Exempt: Public

Wards Affected: All

Function of: Council

CORPORATE IMPLICATIONS

Council Priorities:

The work programme of the Social Care Health and Housing Overview & Scrutiny Committee (SCHHOSC) will contribute indirectly to all 5 Council priorities. Whilst there are no direct implications arising from this report the implications of proposals will be details in full in each report submitted to the Committee

RECOMMENDATION(S):

- 1. that the Social Care Health and Housing Overview & Scrutiny Committee**
 - 1.1 considers and comments on the proposals to enhance the health scrutiny functions;**
 - 1.2 considers and approves the work programme attached, subject to any further amendments it may wish to make;**
 - 1.3 considers the Executive Forward Plan; and**
 - 1.4 considers whether it wishes to add any further items to the work programme and/or establish any Task Forces to assist it in reviewing specific items.**

Overview and Scrutiny Work Programme and proposals for health scrutiny

1. The currently drafted work programme for the Committee is attached at **Appendix A.**
2. Throughout 2012 Central Bedfordshire Council was one of 14 Scrutiny Development Areas (SDAs) working with the Centre for Public Scrutiny (CfPS) and the Department of Health to develop more effective scrutiny of health and social care. Members were engaged in discussions regarding the most effective way of undertaking robust health scrutiny. In 2013 the final report of the enquiry into Mid-Staffordshire NHS Trust (the Francis Report) was also

published, which highlighted the importance of seeking the engagement of the public and professionals in setting the work programme and prioritising items accordingly.

3. In light of the outcomes of the CfPS programme and the Francis report it was recommended by the Overview and Scrutiny Coordination Panel that:-
 - 3.1 Health scrutiny has its own visible section on the agenda of the SCHHOSC that incorporates matters relating to the health of children. The Chairman of Children’s Services OSC has also been appointed as a Member of SCHHOSC to promote collaboration. This will ensure that scrutiny of health and wellbeing has a clear and visible focus within the SCHHOSC agenda. These changes to the agenda will be trialled in April 2014.
 - 3.2 Work programming will be undertaken more proactively with a range of partners including the Care Quality Commission, the Health and Wellbeing Board, Healthwatch and the Tenant Scrutiny Panel. Information will be included in the work programme report to identify opportunities for collaboration and to prevent duplication.
4. The Chairman met with partners on 20 January 2014 and the relevant items that were highlighted by others are attached at **Appendix B**. Comparing Appendix A and B Members are asked to consider whether any of these items that are not already on the work programme should be added or if a collaborative approach could be considered. It is suggested that a more detailed work programming session be held with Members prior to their meeting in May 2014 to discuss the key issues for scrutiny during 2014/15.

Overview and Scrutiny Task Forces

5. In addition to consideration of the work programme, Members may also wish to consider how each item will be reviewed i.e. by the Committee itself (over one or a number of Committee meetings) or by establishing a Member Task Force to review an item in greater depth and report back its findings.

Executive Forward Plan

6. Listed below are those items relating specifically to this Committee’s terms of reference contained in the latest version of the Executive’s Forward Plan to ensure Members are fully aware of the key issues Executive Members will be taking decisions upon in the coming months. The full Executive Forward Plan can be viewed on the Council’s website at the link at the end of this report.

Issue	Indicative Exec Meeting date
Housing Allocations Policy for Central Bedfordshire	27 May 2014

Those marked (*) are not presently on the Committee work programme.

Conclusion

7. Members are requested to consider and agree the attached work programme, subject to any further amendment/additions they may wish to make in light of Appendix B and highlight those items within it where they may wish to establish a Task Force to assist the Committee in its work. This will allow officers to plan accordingly but will not preclude further items being added during the course of the year if Members so wish and capacity exists.

Appendix A Social Care Health and Housing Overview and Scrutiny Work Programme

Appendix B Outcomes of recent work programming session

Background reports

Executive Forward Plan (can be viewed at any time on the Council's website) at the following link:-

<http://www.centralbedfordshire.gov.uk/modgov/mgListPlans.aspx?RPId=577&RD=0>

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Appendix A

Work Programme for Social Care, Health and Housing Overview & Scrutiny Committee 2014 - 2015

Ref	Indicative Overview & Scrutiny Meeting Date	Report Title	Report Description	Comment
1.	23 June	IVF Procurement of Services	To consider a report on the proposed procurement of IVF Services	
2.	23 June 2014	Homelessness Strategy	This (draft) policy describes what the Council considers to be a suitable home to which the Council can discharge its homelessness duty. The Committee will be asked to comment on the draft policy and associated consultation report and EIA	
3.	23 June	Homelessness Review	To consider and comment on the Homelessness Review	
4.	23 June 2014	Welfare Reforms	To consider and comment on the report on Welfare Reforms in Central Bedfordshire.	
5.	23 June 2014	Discretionary Housing Payments Policy	To receive an update and provide feedback on the Discretionary Housing Policy consultation	
6.	28 July 2014			

Ref	Indicative Overview & Scrutiny Meeting Date	Report Title	Report Description	Comment
7.	8 September 2014	Park Homes Strategy	The strategy is an overarching document that sets out the approach for all Park Home issues in Central Bedfordshire including standards, fees, advice, assistance and licensing	
8.	8 September 2014	Review of Disabled Facilities Grant (DFG) benchmarking following independent DFG review outcomes.	Review of performance	
9.	20 October 2014	Tenant Scrutiny Panel	The Tenant Scrutiny Panel to report on the implementation of the Anti Social Behaviour recommendations and the next area of investigation.	

Appendix B

The table below demonstrates the outcomes of a work programming session with partners from several organisations held in January 2014 relating specifically to 'health' items. Also included are issues raised by colleagues in Children's Services, Public Health and Social Care. In light of the below Members are asked to consider whether any of these items should be added where they are not already on the work programme:-

Items identified as a priority:

- Recommissioning of mental and community health services (incorporating Child and Adolescent Mental Health)*
- Homelessness *
- The Better Care Fund and its implementation *
- Strategic Review of Bedfordshire Health Services *

Other issues under consideration by Healthwatch	Other issues under consideration by the Health & Wellbeing Board	Other issues identified
<ol style="list-style-type: none"> 1. Stroke services 2. Visual Impairment Service 3. Housing matters, including housing for the elderly 	<ol style="list-style-type: none"> 1. Joint approach to integration 2. Health and Social Care self assessment framework 3. Joint Strategic Needs Assessment (JSNA) review 4. Health and Wellbeing Strategy 	<ol style="list-style-type: none"> 1. Monitoring of Budgets, performance and emerging policies * 2. Performance of Hospitals and CCG (ie Hospital discharge) * 3. Approach to integration 4. Supporting Aspirations for Children's Health

(Items marked (*) are already on the Committees work programme)

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