

Central Bedfordshire Council

Executive

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Allocations Policy for Independent Living Schemes in Central Bedfordshire

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Purpose of this report

1. The report introduces the Allocations Policy for Independent Living Schemes in Central Bedfordshire. The Policy will ensure that affordable homes provided by Housing Associations and the Council are let or sold for shared ownership in a fair and transparent way, with local people who will benefit most from Independent Living Schemes having the highest priority to move them.

RECOMMENDATIONS

The Executive is asked to:

1. **adopt the Allocations Policy for Independent Living Schemes in Central Bedfordshire at Appendix A as the Allocation Scheme for all properties available within Central Bedfordshire where a care and support service is provided within an extra care / Independent Living environment. This policy shall apply to all Providers;**
2. **delegate authority to the Director of Social Care, Health and Housing, in consultation with the Executive Member for Social Care and Housing to:**
 - (a) **allocate properties in accordance with the Allocations Policy for Independent Living schemes;**
 - (b) **amend or vary the detailed wording of the Allocations Policy, where to do so does not change the strategic intent or overarching aims of the Policy, so as to ensure the Policy is and remains effective in operational terms, to achieve the Policy objectives over time, taking account of considerations related to supply and demand; and**

(c) develop and implement monitoring arrangements to ensure that the aims of the Policy are achieved and to support the Council's duty to promote Equality, in line with the Equalities Assessment, which shall be kept under review.

- 3. note that the Policy including the sales / lettings processes prescribed by the terms of the Policy, will be an appendix to the Council's main Allocations Policy (forming the Council's Allocations Scheme), and shall be applied first to lettings/sales of apartments at Priory View, Dunstable. The Policy shall then be reviewed, in advance of its application to sales and lettings at Greenfields, Leighton Buzzard.**

Overview and Scrutiny Recommendations

2. The Allocations Policy was considered by the Social Care, Health and Housing Overview and Scrutiny Committee on 22 June. The Committee considered the main findings of the Equality Assessment as well as the comments received during public consultation. The Committee's recommendations to Executive are as follows:–
- 2.1 That the Committee supports the concept of Independent Living and the benefits it will bring to our residents.
- 2.2 Applauds the policy intent, which recognise local people's need and also ensures that a balance of varying levels of care, support and housing need are catered for, so as to build communities within the Council's Independent Living Schemes.
- 2.3 That the minimum requirement of Care/Support needs that is stated within the Policy should be 0–10 hours and not 5–10 hours, as had been proposed in the draft Policy that was subject to public consultation.
- 2.4 To note that the policy and the sales/lettings processes prescribed by the terms of the policy shall be reviewed, in advance of its application to sales and lettings at Greenfields, Leighton Buzzard having first been applied to lettings/sales of apartments at Priory View, Dunstable.

Introduction and context

3. The Council's Better Offer for Older People is visibly represented by an ambitious development programme that includes new schemes like Priory View, Dunstable and Greenfields, Leighton Buzzard.

The Sheltered Housing Review has enabled the development of 23 homes at Croft Green, Dunstable. 'Bricks and mortar' homes are highly visible, yet the ingredients for true success are the services provided to residents and the approach taken to establish a vibrant community and create a good neighbour environment, where residents support each other.

4. The Housing Service is embarked on a journey to create "Independent Living" embodied within the new developments, yet also extending to every aspect of support to vulnerable people. The approach will balance support provided to a person (e.g. at a time of crisis / bereavement) with actions taken to strengthen community spirit and connect the community to the person in need (and vice versa). E.g. encourage volunteering.
5. The journey to create "Independent Living" (IL) as a service offer will unfold over several years. It is imperative that the new schemes are vibrant and that the Council is proactive to create resilient communities that are mutually supportive. The Council's first two schemes are key to the long term success of the Council's strategy.
6. The IL approach began by strengthening tenancy sustainment, as the primary response to the challenge of welfare reform. A second opportunity came through the Sheltered Housing Review, to modernise the traditional 'sheltered scheme' and outreach support to people living in the private rented sector and owner occupied homes.
7. Looking ahead, the Housing Service is taking a commercial approach to generate additional income by creating new services to complement our established offer and also extend the established offer to new customers. By creating an "Independent Living" offer, the Council is developing a broad range of services that are available to all residents and not just to the established customer base. For example, gardening services and support provided to older people who choose to pay for a service provided by the Council, at a fair market price. Similarly, the Housing Service is providing a home ownership service that it has not previously provided. The Council is breaking new ground.
8. There are many facets to the journey that will build on established good practice, much valued volunteer support and opportunities to innovate. One aspect of innovation is to create new, large scale schemes including Priory View, Greenfields and Houghton Regis Central, in total delivering over 320 mixed tenure apartments, as well as community facilities, restaurants et al, to function as hubs that benefit the local community, as much as the residents of the schemes. These schemes are just the beginning of a journey that will deliver many hundreds of homes for older people over the next few years. The Council is creating an exciting new offer, yet the vanguard of long term success will be the first few schemes – Priory View in particular – in terms of quality and community spirit.

Community and the Balanced Care Profile

9. The Balanced Care Profile (BCP) is an illustration of how Independent Living is being created with the community in mind, with an eye to the best mix of people to establish a vibrant and thriving community. The themes of 'community' most evident within the new schemes are:
 - Enjoying your independence
 - Being a good neighbour, looking out for each other
 - Joining in and making the best of all the facilities
 - Respecting each other's views and ways of living
 - Having your say to make an 'Independent Living a great place to live.
10. The Balanced Care Profile will establish a community that is mixed, with a profile of 40% residents with high care needs and the remaining 60% divided equally between residents with moderate and low – or no – care needs. The Care Team will provide tailored care packages that support residents to live independently, yet take part in community life in a way that suits them. Whilst there is choice, there is also clear expectation of a residents' participation and belonging to a community.
11. Residents will range from older people with full mobility and good mental health to those with need for dementia support and mobility issues, to those with no care needs at all. The BCP will be maintained through the Allocations Policy / assessment process to ensure that the scheme remains a vibrant, active, participatory and self supporting community.
12. A Community Charter is proposed. Put simply, if a person prefers to spend much of their time in an apartment, then an Independent Living Scheme is probably not the place that they should seek to move to. Independent Living is a lifestyle choice, where "community life" requires people to make a positive contribution and to participate in activities.
13. If the BCP is not maintained, the risk is that:-
 - Involvement and participation diminish because the proportion of residents with high care needs is too great, resulting in perhaps only a small number of people being able to provide mutual support.
 - The scheme balance leans too much toward active participation, such that there are too few people living at the scheme who would benefit from the mutual support provided by other 'more active' residents, who do not have comparable care/support needs.

The key word is 'balance', which will be maintained through the BCP.

14. Engagement events were organised earlier in the year, attended by several hundred enthusiastic, potential customers, asking questions and providing feedback on every aspect of the proposed new schemes. The current Expression of Interest register for Priory View contains over 700 names. It is expected that the demand for Priory View and Greenfields will exceed the number of apartments that are available.
15. The level of potential demand demonstrates opportunity for the market and the Council to respond. However, these first few schemes are 'affordable' and the Council will determine who shall be eligible, have priority and will allocate apartments in line with the Allocations Policy at Appendix A.

Background to the Policy

16. The Council's Allocation Scheme for affordable housing was reviewed during 2013. A new Policy was implemented during October 2014. The Lettings Policy for Rural Exception sites is an appendix to the main Allocations Policy. Similarly, this new Policy for Independent Living Schemes will be an appendix to the main Policy. Together, these policies constitute the Allocations Scheme for Central Bedfordshire.
17. The demographic projections for Central Bedfordshire have been a catalyst for the development programme. The number of people aged over 85 are likely to increase from 4,700 to 7,100. Similarly people aged 55 and over from 72,140 to 92,800. The demographic challenge creates an imperative to improve the accommodation offer for older people. By creating positive / attractive choices for older people, the Council is able to encourage people to downsize, thereby to release family sized accommodation which will meet the needs of other households through 'chains of moves'. The programme to deliver specialist and ordinary accommodation for older people is a strategy that will be effective in meeting local housing need in Central Bedfordshire.
18. The Council's Allocations Policy contains terms and criteria related to ordinary/designated housing for older people, including sheltered schemes. This new Policy is specific to schemes where Care/Support is provided, specifically the following schemes (currently):
 - Priory View, Dunstable (on completion)
 - Greenfields, Leighton Buzzard (on completion)
 - St George's, Leighton Buzzard
 - Lavender Court, Ampthill
 - Red House Court, Houghton Regis
 - Quince Court, Sandy

All new schemes developed in Central Bedfordshire shall be subject to this Allocations Policy, where the Council has Nomination Rights.

Policy Intent

19. The intent of the Policy is summarised as:-

- A fair and transparent means to ensure that sales and lettings of properties within Independent Living Schemes are available to people with a local connection to Central Bedfordshire who will benefit most from being able to move to a scheme.
- To restrict eligibility to move to an Independent Living Scheme to persons with a connection to Central Bedfordshire and to explicitly exclude those persons who do not have a local connection.
- To rank in priority order the strength of an applicant's connection to the area, so that those person with the strongest connection shall have the highest priority to move to a scheme.
- To restrict eligibility in line with criteria detailed within the Policy, e.g. income/savings criteria and criteria relating to behaviour.
- To promote a positive contribution towards the community spirit of a scheme by requiring all applicants to sign and abide by a Community Charter. By promoting a strong, vibrant community, mutual support is encouraged within a scheme as well as a good neighbour environment. This shall be created through activities and volunteer support where residents and the local community can participate fully the life of the scheme, which shall function as a community hub.
- To establish the schemes as a community of older people, aged 55 years and over.
- To prioritise applications from persons with a Care and/or Support Need to live within a scheme, in line with the Balanced Care Profile (BCP) set out within the Policy. The BCP is the mechanism which ensures the success of a scheme over time. Officers will have regard to the BCP in all allocations decisions (sales and lettings).
- To prioritise applications from persons in Housing Need. This shall include enabling people to move from residential care settings. This is explicitly stated in the policy, as well as priority to those persons living in family sized accommodation, to enable them to downsize and make their current home available to meet local housing need.

20. The Policy is designed to filter applications through a sequential process that involves assessment of a person's Care, Support and Housing Needs intended to determine who shall be made an offer of an apartment.

The degree to which the “filtering process” is applied will depend on the level of demand for a scheme or an apartment during the initial letting/sales process and on re-sale or re-let. The Policy has been constructed on the assumption that there will be substantial demand that far exceeds the number of apartments that are available.

21. In the event that the number of applications for an apartment is relatively low, then the process shall be applied in a manner that is relatively straightforward. However, if demand greatly exceeds supply (which is expected for Priory View), the assessment process will probably seem lengthy and possibly onerous from a customer perspective.
22. The Council will undertake home visits and offer advice to applicants about the range of alternative options available to them, where they are unlikely to be offered an Independent Living apartment. Officers will communicate one simple message to all eligible applicants – “..keep in touch about any changes to your circumstances.” Whilst an applicant may not have a high priority this month, or even this year, that is not to say that they may not be a high priority ‘next year, or the year after’. In effect, the process is more like an ongoing engagement to consider a range of options that are right for the person.
23. A monitoring system will be established to track the success of this policy as well as to plan for future developments and influence market provision. The Council intends to satisfy the aspirations of local people attracted by schemes like Priory View and Greenfields. These schemes will be the “sales office” for future development that is market led as well as being delivered by the Council as a high quality offer known as New Generation Housing.

Policy Dilemma

24. The most difficult area of policy development has been the criteria related to the Balanced Care Profile and the definition of Low Care / Support Needs. The Allocations Policy that was recently subject to public consultation defined the low criteria as being between ‘5 and 10 hours’ of care / support on first let and first sale. During consultation, there was significant comment from stakeholders and persons interested in moving to an Independent Living environment with regard to this criteria.
25. Initially, it was proposed to apply the criteria of “Low or No Care Needs” (0 to 10 hours) on subsequent re-sale and re-let once the scheme is fully occupied. However, during the consultation there was a significant theme of comments that reflected concern that Independent Living schemes might be perceived as a “care home” environment. These comments included:–

- “...there needs to be a recognition that those with no care needs will add to the vibrancy and community spirit. It is not a care home...”
- “...to encourage the building of a vibrant community spirit there needs to be a balance of those who need care and more able bodied residents who are willing to befriend and support socially ...”
- “...I believe that a number of able bodied residents over 55 years old would provide for a more vibrant atmosphere and be able to give assistance in the running of facilities of the ILS.”
- “...There are socially isolated older people living in the community and some with mild to severe depression. These people would not meet the criteria to apply as they do not have any care input...”

26. In response to comments received during consultation, the Policy has been amended to state unequivocally that the minimum criteria will be Low or No Care Needs, which shall be 0 – 10 hours. This change is supported by the Overview and Scrutiny Committee.
27. The assessment of an applicant’s housing need is considered to be a sufficient mechanism to prioritise applications, so as to manage demand effectively. Also, recent modelling work shows that the average number of care hours are likely to be circa 5 hours in the “low or no” care needs category. Therefore, the Allocations Policy at appendix A has been amended to show that the minimum requirement is 0 – 10 hours.
28. Executive should note that the consultation responses received were generally supportive of the 5 – 10 hours criteria, with 58% of respondents appearing to support this criteria and 31% stating ‘no’ and 17% stating ‘don’t know. These results appeared anomalous to the conversations that had taken place during the consultation events and therefore a detailed review of the free format comments to the specific questions on “care need” was undertaken.
29. A significant proportion of the free format comments appeared to contradict the respondents’ agreement with the proposed minimum assessed Care Needs. It appears that these respondents either misunderstood the question, or qualified their response to such an extent that they cannot reasonably be deemed to be in agreement. Adjusting the results for the 37 respondents who are unclear produces the following breakdown:-

94 (38.5%)	Yes
76 (31.1%)	No
74 (30.3%)	Don’t know

30. This high proportion of 'Don't know' responses suggests that the question was not well understood. Indeed, the face to face feedback received during two full days of engagement at the Incuba with potential residents is strongly indicative of broad support for the principle of a vibrant community, where some people do not have care needs. It is recognised that many people are drawn to the scheme as a lifestyle choice and 75% of respondents supported the concept of the Balanced Care Profile.
31. The strategy is to create a balanced community so that there is a genuine mix of people with different care and support needs within the Independent Living community, as well as some residents with no care need. It is important to promote health and independence, as well as to focus on reablement. This could mean that people moving to a scheme with a care /support need will be helped in a positive manner potentially to improve mobility so that they require "less care" over time and possibly reach a level of independence where they require no care/support at all.
32. The Policy applies to lettings and sales of affordable shared ownership properties. The Council is being ambitious to apply this policy to sales of shared ownership apartments, where more typically the approach taken within the United Kingdom is to focus on 'sales' to any older person regardless of whether they have either a Housing or Care/Support Need and almost regardless of the strength of their connection to the local area. Typically, the approach taken is to offer apartments for 'rent' to people with relatively high Care/Housing Need and to 'sell' to people categorised as having relatively low Care/Housing Need.
33. The approach being taken in Central Bedfordshire aims to create a mixed/balanced community across both rental and shared ownership apartments and to emphasise a strong local connection to Central Bedfordshire as a fundamental requirement of eligibility. The sales process could be challenging, because the market is relatively constrained, mainly to those persons with a care and/or support need and a strong local connection. The marketing approach to shared ownership sales will need to attract people who are prepared to sell up / downsize. This will include the offer of practical support, especially when people are considering downsizing or alternatives to residential care.
34. The Council will work closely with people to encourage them to consider the shared ownership option as a "planned move". Work is underway to strengthen the Council's offer of support in terms of tailored advice and information, as well as to provide 'enabling support', so that people are able to deal with the practical implications of selling their home to buy an apartment. The Housing Service is creating a home ownership service for the first time.

35. The date of application is not being used to determine priority. This is because the circumstances and needs of an older person can change in a relatively short period of time. The assessment process will have regard to an applicant's need at the time when an apartment is available, it being offered to the person with a strong local connection, who is in greatest need and will benefit most from the offer, whilst being able to make a positive contribution to the community.

Outcome of Public and Stakeholder Consultation

36. There has been extensive engagement with the public and stakeholders, on the draft Allocations Policy. Two events were held at the Incuba Centre, Dunstable each attended by circa 100 people. In addition, everyone who is currently registered on the Expression of Interest Register for Independent Living was sent a paper copy of the draft Policy and invited to comment. Over 700 letters were sent.
37. There were 244 individual responses to the consultation, many of them thought provoking, poignant and so clearly expressing a strong desire to live within an Independent Living community / environment. In addition, numerous conversations took place between officers, volunteers and people interested in Independent Living. Seventy five per cent of responses received were received from persons aged over 65, whilst 42% were received from persons aged over 75. The summary of consultation responses is provided at appendix B.
38. The outcome of public consultation was reported to Overview and Scrutiny Committee. The main findings are –
- Clear support for the Policy and the concept of Independent Living
 - 82% of respondents supported the local connection criteria
 - 75% of respondents supported the Balanced Care Profile to ensure a vibrant community.

Reason/s for Decision

39. The Policy establishes robust assessment criteria in an area where demand is expected to exceed the supply, in the context of an efficiency saving within the Medium Term Financial Plan that will be achieved as a result of:-
- Residents providing support to each other, contributing positively to the community, making the scheme a vibrant place to live
 - Activities to support wellbeing, health and independence being an everyday feature of life within a scheme
 - Reablement and care being the offer from the on site Care Team
 - Allocations to a scheme being in line with the Balanced Care Profile and the thrust/intent of the Allocations Policy.

Council Priorities

40. The Policy for Independent Living supports the Council's priority to promote health and well-being and to protect the vulnerable.

Corporate Implications

41. **Sustainability** – the new schemes support principles of sustainable development by providing suitable/accessible housing for older people, offering choice in the market, where historically the UK housing market has provided unsuitable housing that requires subsequent adaptation.
42. **Public Health** – The Policy promotes independence, active lifestyles and overall health as a positive, life enhancing choice. The impact of the "Independent Living offer" is to create an environment/community where a resident can enjoy good health and independence, with the active support and companionship of neighbours. Over time, the offer will influence volume house-builders, so that they provide accessible homes as the norm, thereby to achieve a positive health impact.
43. **ICT** – There are no direct implications arising from this Policy, However, assistive technology is a key feature of Independent Living and the use of new media (e.g. Youtube videos and tablets) will enable the Housing Service to strengthen the quality of tailored, user friendly advice, as well as to make the advice more cost effective to provide.
44. The risks are as follows:–
 - **Reputational** – Over 700 people have expressed interest in these new schemes. The implementation of the Policy will help people to understand more about the concept of 'Independent Living', the Balanced Care Profile, and the eligibility criteria for these schemes. This may assist people to decide that IL is not for them or that they are ineligible, which may help with any disappointment they may feel.
 - **Economic** – The Council's "better offer for older people" is an economic lever to benefit Central Bedfordshire, providing homes for older people to revitalise town centre locations and to strengthen the local economy.
 - **Demographic** – responding to demographic change is imperative, if we are to avoid problems/costs associated with an ageing population that is not independent, resilient, living safely, happy and well.
 - **Social** – Independent Living schemes will foster community spirit, resilience and function as a community hub by providing a range of shared facilities for both residents and local people to enjoy. The Community Charter will establish a shared sense of values.

- **Efficiency** – There are financial savings within the Medium Term Financial Plan (MTFP), which are contingent on the optimum use/occupancy of schemes by people with care and/or support needs. The Policy will ensure that the optimum occupancy is achieved. It is important that Nomination Rights are secured to all new development of affordable housing, secured through section 106 agreements. These are the basis on which the Council can secure nominations to Housing Association properties and effectively can apply this policy to achieve efficiency savings.

45. **Community Safety** – this policy supports the Independent Living offer, to provide a safe and secure environment for residents. The schemes are not being designed as closed communities. Residents can come and go as they please. CCTV is being fitted and there is an intercom entry system. This will enable persons with dementia to live safely within a supportive environment and a ‘dementia friendly’ community.

Legal implications

46. This Policy, the allocations process and criteria are in line with current legislation and the statutory codes of guidance.
47. This Policy applies to all properties (shared ownership and rental) to which the Council has Nomination Rights. These “rights” are secured in relation to section 106 development (affordable housing contributions), where the Council typically secures Nominations to Housing Association properties. These rights are valuable because lettings and re-lets, sales and re-sales can amount to a substantial number over the long term. The control of lettings and sales through the ‘nominations’ process ensures that efficiency savings are achieved initially, and continue to yield efficiency year after year over the very long term.
48. This Policy provides customers with information about the shared ownership sales process, as they relate to the assessment process and prioritisation. Every applicant will be advised to obtain their own financial advice and to ask questions of the provider about the detail of their “shared ownership offer”. The Council is breaking new ground with home ownership services, all of which requires policies and procedures to be developed that are aligned to this Policy. These matters are outside the scope of this Allocations Policy.

Financial Implications

49. The Policy is a mechanism to manage demand, effectively to divert customers from alternative care settings, thereby to achieve efficiency savings. This approach assumes that people with Care and Support Needs move to an Independent Living Scheme (in sufficient numbers) and the cost of the care being provided is less than the cost of care provided within alternative settings.

These savings can be achieved in several ways, some of which are difficult to measure/quantify:-

- Wellbeing and re-ablement effects of people being healthy, active, independent and requiring less (or possibly no) intervention from the Council, due mainly to the positive effect of the environment and mutual support of their community.
 - Savings because a person is able to live independently in an environment that is more cost effective than the care being provided within alternative settings or other 'care' models.
50. The Policy is designed to maintain a Balanced Care Profile. It is likely that the demand for these new schemes will far exceed the initial supply. The challenge is to attract people with care and/or support needs and to establish processes that divert people from alternative care settings.
51. This point is especially true in terms of shared ownership sales, where the target customer base (owner occupiers with high and medium care needs) will require a proactive approach to identify and support people to apply, as well as to downsize and possibly to sell their current home.

Equalities Implications

52. Central Bedfordshire Council has 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 reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
53. An Equality Assessment has been carried out for this policy taking account of consultation responses, and can be found at appendix C. Consideration of national and local research and consultation findings highlights the following Positive Equality Impacts:—
- Older / disabled people will be supported to move to better quality, more accessible housing.
 - Facilities will be highly responsive to changing care and support needs.
 - Ethos will enhance community spirit and interaction, reducing isolation and vulnerability.
 - Charter protects and promotes rights to independence, respect and being treated fairly.
 - Wider community benefits by opening up access to greater variety of local housing stock.

Conclusion and next steps

54. The Allocations Policy will establish a fair and transparent means to ensure that apartments within Independent Living Schemes are sold or let to people with a local connection to Central Bedfordshire, who will benefit most from being able to move to a scheme.
55. The new schemes being developed will represent the Council's "sales office" for future developments and as such will be high quality in every respect, not least to create vibrant, resilient communities. It is clear from engagement with potential residents over recent months that the single most pertinent issue raised by most people is that they want to move for the social life and community aspect of these schemes. It is evident that people are buying into the concept of 'community' that is being created as the Council's Independent Living offer.
56. The Council's journey to create Independent Living has several facets, which the new Policy supports:
 - Provide as well as stimulate the market to provide a Better Offer of ordinary, accessible and specialist accommodation for older people
 - Provide high quality, tailored advice and accessible information that is relevant to older people, as well as the support they need to deal with practical difficulties
 - Improve the offer to customers, developing new areas of service in response to customer demand, at a fair market price
 - Encourage community spirit, good neighbour and voluntary support as the cornerstone of the Independent Living offer.

Appendices

Appendix A Allocations Policy for Independent Living in Central Bedfordshire

Appendix B Consultation response report

Appendix C Equality Assessment

Background Papers

None.