



Central Bedfordshire Council

Independent Living in Central Bedfordshire

'... a better offer for older people known as New Generation Housing ...'

Allocation Scheme for apartments
available to rent and purchase on a shared
ownership basis within affordable
Independent Living schemes in Central
Bedfordshire.

Appendix A

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FOREWORD

As the Council's Executive member responsible for Social Care and Housing, I would like to welcome you to the Council's new Policy for allocations to our new **Independent Living** schemes. The objectives of the Policy are to ensure that homes are sold for shared ownership and let for rent in a fair and transparent way, with local people who will benefit most from Independent Living schemes having the highest priority to move in.



Independent Living Schemes offer the independence, privacy and security of self-contained apartments with a range of communal facilities and support services designed to meet the needs of older people. As well as providing homes for local people our first scheme, Priory View, also provides them with access to activities, restaurant facilities and support and care services.

We want older people who choose to live in an Independent Living scheme to benefit from being part of a vibrant and active community. Each scheme will have a Community Charter, which residents will sign up to as their commitment to making a positive contribution to the community spirit of the scheme, by supporting their neighbours to enjoy life, staying healthy through participation in an active lifestyle and enjoying all that the scheme has to offer.

The Allocations Policy will be kept under review to ensure that the objectives are being met. The first review will take place within six months of the first occupation of Priory View, and will take into account the experience of everyone who is interested in this new and improved offer for older people, which we call **New Generation Housing**. The key ingredients are –

- Attractive, high quality, accessible homes, nice places to live
- Well located schemes, close to all that town centres have to offer
- Positive lifestyle choice – healthy, active, enjoyable – full of opportunity
- Good neighbours with the strength of community and mutual support

Councillor Mrs Carole Hegley

Executive Member responsible for Social Care and Housing

Policy Context – Allocations Scheme

This policy is one of several that are complimentary to each other and together represent an overall Allocations Scheme for all affordable housing in Central Bedfordshire. This covers housing owned by the Council and also housing where the Council has Nomination Rights. This Policy is similar to the Council's Local Lettings Policy for Rural Exception homes, both of which are appendices to the Council's main Allocation Policy.

1. Application process for Independent Living Schemes

The Council will apply the criteria described in this document when allocating homes in all of the Independent Living Schemes in Central Bedfordshire, whether the homes are being sold on a shared ownership basis, or the allocation of apartments to rent.

The Council will hold an **Independent Living Expression of Interest Register**. This list shall be maintained for schemes managed by the Council as well as schemes managed by Housing Associations. The list is described on page 5 and shall be maintained for persons interested in renting a home and applicants interested in shared ownership options.

Further on in the Policy (page 17) there is an example that illustrates how all applications will be prioritised, across both shared ownership and rental apartments and for different levels of Care and Housing Need. All eligible applicants will be categorised, first on the basis of their "local connection" to Central Bedfordshire, then their Care Needs and thirdly their Housing Need, as a "whole assessment" of the person.

To underpin a fair and transparent process, applications for both the shared ownership apartments and the rental apartments will have separate lists where applications are prioritised, with an applicant's position on a list determined by their local connection, care need and housing need. People wishing to apply for Shared Ownership of apartments are required to register their interest with the Help to Buy Agent before completing the Central Bedfordshire Council application form.

The ordering of an applicant's priority will be further informed by:

- Three categories of "local connection" (creating three separate lists), See page 9.
- Three levels of assessed Independent Living Care Need (ILC) – Low, Medium and High (by which each list is divided). See page 12.
- Three levels of assessed Housing Need, by which each list is ordered. See pp 13
- Finally, in the event that two of more applicants having the same priority, we will decide which applicant is offered an apartment on the basis of the distance that the person lives from the scheme.

It is very likely that Independent Living Schemes will be over-subscribed and we therefore need a relatively complex and detailed prioritisation process to ensure that our policy objectives are met and that overall, the process is seen to be fair. There are more details later on in the Policy explaining how the process will be managed.

Advice and information will be provided to all persons on request, to enable them to make informed decisions about the options available, including specialist as well as ordinary accommodation, with and without care and support services provided.

The process for lettings and sales when a scheme is first occupied will be different from the process for re-lets and re-sales, once a scheme is operational and fully occupied. However, the principles and criteria that are set out within this Policy, supported by the criteria contained within the Council's main Allocations Policy, shall be consistently applied, whether the apartment is being let or sold for the first time or on subsequent occasions.

Application process – when the Scheme is being occupied for the first time

The process to apply for an apartment is comprised of four stages, which are –

- Expression of Interest
- “Application period” when a scheme is first being “advertised”
- Application
- Assessment and allocation
- Offer of an apartment, or waiting list

Expression of Interest

The Council will maintain an **Expression of Interest Register** for all persons who have an interest in a particular scheme or wish to be kept informed more generally about future developments. This list will hold basic information and its primary purpose will be to understand the potential demand for Independent Living across Central Bedfordshire, as well as to keep people informed about our progress. Joining the Expression of Interest list does not mean that a person is submitting an application for a particular scheme. The Council will provide advice and information at any time, on request.

Application Period – when a scheme is first being “advertised/promoted”

When apartments are available to let or be sold at a particular Independent Living Scheme, the Council will write to every person on the Expression of Interest Register and information will be made available locally and on the Council's website, to say that applications are being invited for a particular scheme.

Applications will be invited within a set timescale, known as the **Application Period**.

At the end of the Application Period, every application for the rented and shared ownership apartments will be assessed by the **Independent Living Panel** (see page 13) based on the applicant's eligibility, potential to make a positive contribution to the scheme, their Care Needs, their Housing Needs, and overall with regard to the Balanced Care Profile of the scheme. A summary of these criteria is provided below and a more detailed explanation of these assessment criteria is provided further on in the Policy.

Assessment and allocation process

Once an application has been made, the assessment process will begin. If you are not successful – but are eligible for Independent Living in Central Bedfordshire – your name will be placed on a Waiting List. If you are not successful and you are not eligible, you will be informed promptly that your application was not successful. We will also offer to provide advice and information about other options that are available to you.

The process to assess your application is described in full within this Policy. It is not possible to say where you rank in terms of priority until the process has been undertaken in full, as your ranking will depend on a number of factors –

- The strength of your local connection to the Central Bedfordshire area
- Whether you wish to rent or part buy and how many applicants there are overall and how many there are for a specific type of property. Examples include 1 or 2 bed, rent or part buy.
- Your Care Needs
- Your Housing Needs

These are all variable factors and a great deal will depend on demand overall from eligible applicants, as to how long the assessment process will take. We will keep you informed during the process and advise you promptly if your application is unsuccessful. That said, we recognise that needs and circumstances do change and therefore, being unsuccessful does not mean outright refusal. On the contrary, your interest in the scheme is recorded and we will contact you when an apartment is available, to ask whether you wish to update your information and be re-assessed.

The Waiting List is **not maintained in date order because date of application is not considered as a priority criteria**. The date of all applications received during the application period shall be the same. Thereafter, on subsequent letting and re-sales, the **date of application shall be immaterial**.

Eligible applicants will receive a home visit as part of the assessment process, where they are of sufficiently high priority on the basis of information provided within their application, that they may be offered an apartment to rent or part buy.

Offer of an apartment

An offer of an apartment will lead either to the sale of a property or a tenancy agreement for your new home. These processes are not described within this Policy.

Shared ownership sales

Applicants with an interest in shared ownership apartments are required to register their interest with the Help to Buy Agent before completing the Central Bedfordshire Council application form. Applicants applying for Shared Ownership apartments should be aware that a Financial Assessment will be undertaken to establish whether the applicant can afford to purchase a shared ownership apartment.

Application process – re-lets and re-sales once a scheme is fully occupied

The re-let and re-sale process will depend on several factors and will be developed following the first occupation of Priory View in Dunstable, taking advantage of the feedback of both the new residents of Priory View and also applicants who were not successful in being able to purchase or rent an apartment. New schemes are likely to be over-subscribed and therefore we want to learn from the experience of all applicants in developing a fit for purpose process for all re-lets and re-sales.

At this stage, we do not know what the demand will be and so the process is being designed to manage any situation where the number of applications far exceeds the number of apartments available.

Development of future re-let processes will be communicated and consulted on as required, following an evaluation of the Policy, including customer feedback and a review of the outcomes.

2. An overview of eligibility and priority

Eligibility criteria determine whether an applicant can or cannot apply.

Priority criteria establish the order or ranking of applicants on the waiting list, relative to other applicants. An offer of an apartment will be made on the basis of an applicant’s priority.

The table below presents an overview of both eligibility and priority criteria, in a summary form that is also sequential to reflect the decision making process that will take place. This table enables anyone reading this Policy to see the relationship between eligibility and priority and also the step by step approach that is taken, to first establish eligibility and then, to determine the order in which applications shall be placed, whether an applicant seeks to rent or purchase an apartment.

Local Connection for Independent Living (LCIL) criteria are used first to determine eligibility to join the Waiting List and secondly to establish priority on the Waiting List. There are three criteria used to measure the strength of a local connection to Central Bedfordshire. These are detailed on page 9.

Summary: the assessment process is sequential 1 to 9

Applicants will be notified at the earliest opportunity if they are not eligible.

	Main criteria	Brief explanation
1	Eligibility	All applicants must first satisfy the eligibility criteria listed below, including age, local connection and eligibility for social housing
2	Financial Assessment	All applicants must be in need of affordable housing. Please refer to sections 4 and 5 below, relating to ineligibility and financial assessment. It is possible to apply for both shared ownership and rental apartments, depending on your individual circumstances.

3	Community Charter	Applicants must sign a Community Charter, as all residents are expected to make a positive contribution to the life and community spirit of the scheme, in their own way.
4	Local connection – Independent Living (LCIL)	Applications will be listed according to the three criteria on page 9, which relate to the strength of an applicant's connection to the Central Bedfordshire area.
5	Balanced Care Profile	All lettings and all sales shall support a balanced care profile (BCP) at the scheme and over time, shall ensure that the BCP is maintained. See illustrative example on page 10.
6	Assessed Independent Living Care Needs (ILC Needs)	The assessment of Independent Living Care Needs shall be undertaken by Adult Social Care and shall be categorised as either high, medium, or low care needs. The assessment of care needs shall take place in parallel with the assessment of housing need, as being a “whole person” assessment to achieve a balanced care profile.
7	Specific priority, to promote independence	An applicant who lives permanently in a residential or nursing care setting, who is able (on the recommendation of Adult Social Care) to move to an Independent Living scheme, shall have priority in relation to all other applicants with a high level of need.
8	Assessed Housing Needs	Housing Need is assessed as being one of three categories, the lowest category being ‘no housing need’ because the applicant is adequately housed, then band 2 (“in need”) and band 1 (“a pressing need to move”). Applicants will be ranked in order of their housing need and it is possible that several applicants will have the same level of need.
9	Distance living from the Scheme	In the event of two or more applicants having equal priority, then it shall be the applicant whose permanent residence is closest to the scheme that shall have priority to purchase or rent an apartment.

3. Eligibility Criteria

Eligibility for Independent Living Schemes is based on a requirement to meet the criteria listed below. There are additional eligibility criteria for shared ownership sales which require an additional Financial Assessment.

Age criteria

An age criteria is applied to Independent Living Schemes as the accommodation is specifically designed for older people. The schemes require the provision of care and support, as well as social activities which are provided on site and which are geared specifically towards older people.

The applicant, and where applicable a partner or joint sharer must be aged over 55. There is no restriction on the composition of the household. For example, an application could be made up of an older person and an adult child, two siblings, two adult sharers or an applicant and a live in carer, provided they are aged over 55.

Local Connection for Independent Living (LCIL) criteria – one, two, three

All applicants must have a local connection to the Central Bedfordshire area. This can be established by one of the following grounds. However, priority shall then be determined by local connection on the basis of criteria 1, followed then by criteria 2, and then 3 (in strict order below). In effect, three separate lists will be created.

Criteria One

Applicants with a local connection to Central Bedfordshire as a result of their continuous residence in the council area during the **3 years prior to the application** as a result of their primary/sole residence in the area throughout this period.

Criteria Two

Applicants who have been resident for less than three years or are not currently resident, who have a local connection to the area through a close family association by way of a mother or father, son or daughter, sister or brother or some other special reason where the applicant **has previously been resident** in Central Bedfordshire Council area for a period of **not less than 5 years**.

Criteria Three

Applicants who have not previously been resident in the Central Bedfordshire Council area and have a local connection to the area through a family association made by having a mother or father, son or daughter, sister or brother living in the area for **three or more years** or by way of some other special reason.

Applicants who do not have a local connection of the kind described above are not eligible for Independent Living schemes within the Central Bedfordshire area. The Council is providing these homes primarily to benefit local residents.

In certain circumstances, where a property is being re-sold on a shared ownership basis, there shall be a cascade mechanism, whereby a home owner with a mortgage on their property may be able to sell a property to a market that is wider than Central Bedfordshire. This concession shall only apply in the event that the home owner or their family are unable to sell the property within a reasonable period of time. This policy is not detailed here. However, guidance may be obtained upon request.

Contribution towards sustaining a strong and vibrant community and avoiding loneliness and social isolation

All applicants to Independent Living Schemes will also be assessed for their ability and willingness to make a positive contribution towards community life. That assessment will relate to each individual person and the contribution that they feel able to make, on their own terms.

In terms of **eligibility**, the single requirement is that each applicant shall sign the Community Charter. We recognise that some applicants may feel disadvantaged possibly through a lack of social interaction over a period of time, or loneliness, ill health or bereavement. These circumstances will not prevent you from being eligible to move to an Independent Living scheme.

On the contrary, we will listen to your concerns and aspirations and, providing you are willing to sign the Community Charter, knowing that the scheme is right for you, we will help you in every way possible to enjoy life to the full. Every resident will stand to benefit from a thriving, active and supportive community.

4. Ineligibility for Independent Living Schemes

Applicants will not be eligible to apply for Independent Living Schemes if they are in breach of the general principals of the Central Bedfordshire Council Housing Allocations Scheme (i.e. the main Allocations Policy) as set out below:-

- A poor tenancy record including factors such as debts, poor rent payment record, anti-social behaviour or other behaviour not compatible with living in a community of older people.
- Outstanding debts to the Council or to Housing Associations.
- Care and/or support needs are such that they cannot be reasonably or practically met by an Independent Living Scheme.
- Prohibited by law as ineligible under Part VI of the Housing Act 1996 and associated statutory instruments, on the grounds of immigration control, habitual residency in the UK or are an EU national with no leave to remain in the UK.

5. Financial and affordability assessment

In order to be eligible to purchase an apartment under a **shared ownership scheme** applicants need to meet the following criteria:

- Must satisfy an affordability assessment to establish that they can afford to purchase a leasehold interest in an Independent Living Scheme but would be unable to afford similar accommodation on the open market in the Central Bedfordshire area.
- The household income (if in employment) does not exceed £60,000 a year.
- Not own or have an interest in another property either in the UK or abroad.
- Are a first time buyer or previously owned a home but cannot afford to buy in a privately run Independent Living scheme with care.

In order to be eligible to **rent an apartment** within an Independent Living Scheme applicants need to meet the following criteria:

- Household income that does not exceed £24,000 per annum.
- An applicant has savings and or assets of less than £50,000.

It is possible to apply for both shared ownership and rental apartments, depending on your individual circumstances. Also, you may initially apply for a shared ownership option, but having undertaken a financial assessment, you may consider that a rental option is best suited to your financial position.

6. Balanced Care Profile

An Independent Living Scheme is designed to support care needs which range from low level needs such as assistance with cleaning, to high level Care Needs such as day and night care, where a person requires assistance due to mobility problems.

Our primary aim is to foster wellbeing within the scheme and encourage a ‘good neighbour’ community spirit. We will also encourage an active lifestyle to enable residents to maintain their independence and their health.

To achieve this aim, we will create a community where there is a mix of residents with differing levels of care needs, across a spectrum from high to low needs. It is highly likely that residents care needs will increase over time. Therefore we believe that a balance of differing Care Needs will ensure that the overall Care Needs of the Scheme can be met.

This approach is known as the **Balanced Care Profile** and it is the single most important theme that will ensure the success of an Independent Living scheme, over time. The **Balanced Care Profile** aims to achieve the following mix of residents:

- 40% of residents with High Care Needs
- 30% of residents with Medium Care Needs
- 30% of residents with Low Care Needs

The three levels of Care Need are determined by the assessed hours of care need as shown below.

Balance	Independent Living Care Need per week – assessed number of hours
Low or No care needs	0 to 10 hours per week.
Medium care needs	11 to 20 hours per week
High care needs	21 hours per week, or above

The Independent Living Allocation Scheme is designed to let apartments and to sell shared ownership properties with the intention of maintaining the Balanced Care Profile. This is illustrated in the diagram on page 17. If the proportion of people with high care needs greatly exceeds 40% the Independent Living environment will diminish and the scheme could become less effective because the contribution of a vibrant active community to support wellbeing is reduced. The balance will be closely monitored, as a key determinant of priority when apartments are re-let or re-sold.

The minimum level of care and/or support needs for an applicant to be eligible to move into an Independent Living scheme is 0 to 10 hours within the “Low or No needs” category.

7. Prioritising applications – priority criteria

Eligible applications will be assessed and prioritised based on the following criteria – at all times, having regard for the Balanced Care Profile.

- Strength of their local connection to the Central Bedfordshire area (3 criteria)
- Independent Living Care Needs (assessed)
- Housing Need (assessed)
- Distance the applicant is living from the scheme, as their permanent / sole residence, in the event of two or more applicants having equal priority. This criteria is effectively a “tie-breaker”, should all other things be equal.

These criteria are specified in more detail below.

Local Connection for Independent Living (LCIL) criteria

Once an application has been determined as eligible due to a local connection, the details of the local connection are then used to inform the prioritisation of the application. Applications are placed into three separate ranked lists, according to which of the three local connection criteria the applicant meets.

All subsequent prioritisation shall take place (for shared ownership sales and rental apartments) on the basis that sales/lettings are first made to applicants with the strongest local connection to Central Bedfordshire (criteria 1, page 9) prior to lettings/sales to applicants having a connection defined by criteria 2 and then criteria 3 (also page 9).

The Council intend that local people who will benefit most from Independent Living schemes shall have the highest priority to move in.

Assessed Independent Living Care (ILC) Need

An Independent Living Care Needs Assessment is carried out by Adult Social Care. The Care Assessment is based on the level of risk to the applicant and the level of care required to reduce the risk. Adult Social Care Services reserves the right to decide which level of risk will be eligible for care. Examples of Care Needs include help with:-

- Cleaning their home
- Getting out of bed and going to bed
- Washing and bathing
- Dressing
- Toileting
- Specialist help with communication and mobility

The applicant's Care Need will be assessed as High, Medium or Low (see page 11), to reflect the number of hours per week that are required to enable the person to be independent and safe in their home. This is illustrated on page 15 where an example is provided.

Assessed Housing Need

All applicants will be assessed in terms of their housing need, meaning the “unsuitability of their current accommodation”. The law sets out what a housing need is and it includes living in overcrowded accommodation, lacking basic facilities, having a property in serious disrepair, or having a medical need to move. Where this is NOT the case, applicants will be defined as being “adequately housed”, although it will be recognised that there is a wish to move into one of the Independent Living schemes.

Typical examples of an applicant in housing need are set out below

- The care needed by the applicant, or facilities including aids and adaptations cannot readily, practically or economically be provided in their current accommodation. Their current home is therefore unsuitable.
- Current accommodation may be too large or too small or the internal/external arrangements may be detrimental to the health of the household.
- Current accommodation is too large and moving to smaller accommodation will provide an opportunity to make the current home available to a household in housing need. For example, to make available family sized accommodation.
- Cost of heating their home is causing exceptional hardship.
- Applicant is waiting for discharge from residential care, a nursing home or hospital or other care settings.

Prioritisation of Housing Need

The levels of assessed housing need are as follows –

- Specific priority related to applicants currently living in a residential care setting
- Band 1
- Band 2
- Adequately housed

Specific priority

There is a specific priority, which is designed to promote the independence of people who are resident in Residential Care or Nursing homes, who are able to move to an Independent Living scheme. These applicants shall have the highest priority in relation to all other applicants with a high level of need, where the application is supported by a recommendation from Adult Care Services that the move is in the applicant’s best interests.

Independent Living Bands One and Two

Applicants with an identified housing need will be allocated into one of three Bands. Most applicants will be placed in Independent Living (IL) Band Two and this will cover applicants who are overcrowded, lack basic facilities, or who have a medical or welfare need to move.

Independent Living (IL) Band One is for applicants who are in housing need (as above) but who have an extremely urgent and pressing need to move, or are under-occupying family sized accommodation, or their home requires major adaptation, or

their home is substantially unsuitable for their current needs and there is a risk to health. This will be verified with other professionals. Band One cases will be reviewed every month or as appropriate from the date of being awarded to ensure there is still an urgent need to move.

Adequately housed

Applicants who do not have an identified housing need will not be placed in a Band and will be identified as being adequately housed.

An applicant who is adequately housed, who does not have a Care Need, is unlikely to be offered an apartment within an Independent Living Scheme.

8. Independent Living Panel (ILP)

Transparency

It is imperative that the process is fair and seen to be fair by all applicants.

The assessments being undertaken are “relative”, in terms of the competing needs of (quite probably) a great number of applicants who would like to live at a particular scheme, each of whom will have differing needs that are not easily compared on a ‘like for like’ basis. There are a number of variable factors to be considered that can change from day to day. In particular, the assessment of Care Needs can vary. Similarly, the assessment of Housing Need can also change over time. Applicants should keep the Council informed about any changes to their circumstances or changes to their personal needs or situation. Advice can be provided at any time.

The Balanced Care Profile relates to the whole scheme, whereas an applicant will often see the process from the perspective of their own application. The process has been designed to be objective in their consideration of each individual applicant. However, all applications will be considered having regard to the whole scheme and therefore to the objective overall of creating a balanced, vibrant community.

The allocation of both rented and shared ownership apartments for all Independent Living Schemes (managed by the Council and Housing Association partners) will be undertaken by the **Independent Living Panel (ILP)**. The panel will be composed of a Manager from the Housing Service, a Manager from Adult Social Care, the Scheme Manager, an Occupational Therapist, and a representative of the Care Provider, or any other person considered by the Council to be suitably qualified.

The Independent Living Panel has the remit to –

- Be consistent and fair in the application of this Policy
- To consider all applications on the merit of the application and to ask any questions which are necessary to establish the factual accuracy of any application or assessment undertaken by a professional of an applicant.
- Monitor the success and the outcomes of the process
- Ensure the Balanced Care Profile is maintained for the scheme, over time
- Ensure that all decisions are based on factual information, are fair, reasonably transparent and that applicants are informed of the reasons for an ILP decision

The Independent Living Panel will give consideration to each application received from an eligible applicant. The ILP shall undertake the following assessment:

- Take account of the assessed Care Needs of an applicant.
- Take account of the assessed Housing Need of an applicant
- Consider any additional supporting information from the Health Service or other agencies to ensure that Independent Living is the most suitable option.
- Use the Balanced Care Profile for the Independent Living Scheme and any other relevant information to draw up a short list of applicants to fulfil the 40% requirement for High Care needs, the 30% Medium Care needs and the 30% Low Care needs.
- Give consideration to the balance of the applicant needs between the shared ownership properties and the rented apartments.

The assessment process referred to above is focused on those areas of an application that are open to interpretation and require discussion about the merits of the individual case, relative to other applications. In addition, the ILP must ensure that the process is robust in terms of the accuracy of information related to –

- Eligibility
- An applicant's local connection to the area
- Distance an applicant is living from the scheme (should this criteria be applied)

The example provided on page 15 illustrates how the process of categorising a range of applications will be undertaken by the Independent Living Panel.

All applicants will be advised of the reason for a decision, where an application is unsuccessful.

9. Reviews and appeals

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 must 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 appeal to the Court.

If an applicant disagrees with the handling of any aspect of their application or review 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 made by the Independent Living Panel. This will normally be the Head of Housing Solutions, but in exceptional circumstances may be a senior manager of the Council, at Head of Service level or above.

10. Illustrative Example – allocation/sales of apartments

The example below (page 17) illustrates how apartments for rent / shared ownership will be allocated. The example is for Priory View in Dunstable, where there are 83 apartments, of which 31 will be sold on a shared ownership basis and 52 are available to rent. To manage both the Balanced Care Profile and the split between rented and shared ownership, apartments are placed into six 'pots', each pot being ring fenced according to a level of care need and tenure. Applicants can only be considered for one pot based on their level of 'care need'. However where an applicant has applied for both rented and shared ownership properties, they can switch from rent to a shared ownership option (and vice versa) depending on their financial assessment.

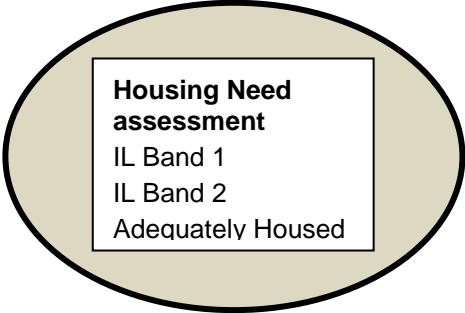
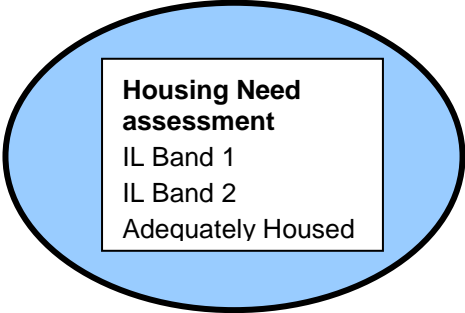




Applications are considered first in terms of eligibility, to exclude ineligible applicants.

Then, all eligible applicants are prioritised into three separate lists according to the **strength of their local connection to the Central Bedfordshire area**. Applicants on the first list (strongest local connection) are then grouped into the three levels of Care Need – High, Medium and Low/No Care Need and their interest in either a rented or purchase a shared ownership property. It is possible to apply for both shared ownership and rental apartments, depending on individual circumstances.

At all times, the Balanced Care Profile will be maintained and properties are pre-selected for each group ("pot") and ring fenced to that that group of people. This can only change if the assessed care need of an applicant were to change. This process is applied across shared ownership and rental properties.

Once all of the properties are allocated at each level/for each pot, then no further allocations will be made to people with that level of care need.

A matching process is undertaken by the Independent Living Panel (ILP) who will first use Care Needs information to match applicants to an apartment. Housing Needs information will be taken into account but this will be secondary to the Care Needs information. Other relevant information, including the 'sign up' to the Community Charter will also be considered.

Local Connection to Central Bedfordshire (LCIL)	All eligible applicants will first be prioritised into three separate lists according to the strength of their local connection to the Central Bedfordshire area . See the Local connection criteria on page 9. The allocation process below will be applied first to list one, then list two and then list three, whilst there are apartments remaining to be allocated.	
Balanced Care Profile	Rent – 52 apartments	Shared Ownership – 31 apartments
(IILC Needs) Level one High Care Needs 40% 21 hours and above	20 apartments 	12 apartments 
Level two Medium Care Needs – 30% 11 to 20 hours	16 apartments 	10 apartments 
Level three Low or No Care Needs – 30% 0 to 10 hours	16 apartments 	9 apartments 

Note. There is also a 'specific priority' referred to on page 8 and 13. The number of cases within this priority group are expected to be small, therefore we have not illustrated this criteria on the diagram above.

In the event that there are apartments remaining unsold or to let after the initial prioritisation process has taken place, those applicants with the strongest local connection shall be prioritised in the same way, in relation to lists two and three (according to the strength of the local connection). See page 9 for detail of the Local Connection criteria.

Consistency between the sales process and the allocation of rental apartments

Within this process, there is clear distinction between apartments available for rent and shared ownership and also a clear distinction between the levels of assessed housing need (i.e. IL band one, two or “adequately housed”) and the assessed levels of care needs. The distinction in process is made to ensure that overall the balance within the scheme is achieved across tenures and across differing levels of care need, in line with the Balanced Care Profile.

Consistency – unexpected outcomes

The allocation and sale of apartments will depend on the demand overall. It is possible, for example, that a person with a high care need may be allocated a home, even though that person is adequately housed and does not have any housing need. Similarly, it is also possible that an applicant with a pressing housing need is not allocated a place, because they do not require any care, at the time they are assessed by Adult Social Care.

The key point is that a **whole person assessment** is undertaken, the aim being to promote wellbeing and to ensure that local people who will benefit most from our Independent Living schemes have the highest priority to move to them. Therefore a person’s Care Need is the initial assessment criteria, followed by an applicant’s Housing Need, as a secondary consideration within the filtering process. We describe the assessment as “whole person” because we see the applicant as an individual.

Discretion

On **first letting and on first sale of apartments**, there shall be no discretion exercised with regard to the minimum age of applicants, which is 55 years. The reason is that the scheme should be established as being for older people, as a new community. There is no discretion when a scheme is being first occupied, with regard to the minimum age.

However, on subsequent re-sale of properties or re-letting, the Council does reserve the right – once the community is established, to exercise discretion. This does not mean that the minimum age no longer applies. On the contrary, it does. However, in some circumstances the Council may invite adult applicants who are under the age of 55 to apply. Adults who have a disability including learning, physical or sensory disabilities or with mental health problems or dementia may be considered in exceptional circumstances.

The decision to open an Independent Living Scheme to a wider range of applicants than people over the age of 55 will be made by the Independent Living Panel. The decision of the Independent Living Panel will be justified on the basis of best use of the accommodation in the Central Bedfordshire area. The proposed sale or letting shall be considered and approved by the Assistant Director Housing, should the Independent Living Panel recommend that discretion be exercised.

11. 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 or 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.

12. Confidentiality, data protection, access to information

Applicant's right 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.

Applicants will also have rights to information as provided for under the Data Protection Act 1998 e.g. to know what information the Council holds on them and how it is processed (see below).

Data Protection

When an applicant applies to the **Expression of Interest List** or applies for a particular scheme, the Council will seek only information that they require to assess the applicant's application in terms of their Care 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 –

- 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 the Data Protection Act 1998

13. 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.

14. Who to contact to ask questions about this Policy?

Carole Commosioung
Implementation Manager - Independent Living
Central Bedfordshire Council Housing Services
Watling House, High Street North
Dunstable
Bedfordshire
LU6 1LF
carole.commosioung@centralbedfordshire.gov.uk

Telephone 0300 300 5379

Charlotte Gurney
Locality Manager (North)
Central Bedfordshire Council Housing Solutions
Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire
SG17 5TQ
charlotte.gurney@centralbedfordshire.gov.uk

Telephone 0300 300 5345

15. How to join the Expression of Interest Register?

Please visit our website and fill out an expression of interest form. On receipt of your details we will acknowledge your contact and send an update on current and planned future developments:

www.centralbedfordshire.gov.uk

Or:

Contact us via e-mail:

independentliving@centralbedfordshire.gov.uk

Persons who wish to express an interest in Priory View, Dunstable should contact:

prioryview@centralbedfordshire.gov.uk

Or:

Telephone us to speak to one of our team:

0300 300 8000 Customer Service Centre

0300 300 5904 Priory View Team

0300 300 8302 Housing Solutions (Register) Team

16. Tailored advice and information:

Accommodation for older people – specialist and ordinary accommodation as an alternative to an Independent Living scheme.

The Council will provide advice and information to enable people to make an informed decision. Our advice will include ordinary housing, as well as specialist accommodation and also supported housing, where care and support services are also provided. We can provide information about all of the Independent Living schemes within Central Bedfordshire and if you are not from the area, we will try and identify the right information for you, or the right person to contact.

We recognise that the decision to move from your current home is not straightforward, especially when you have care and support needs. Our advice to you will be tailored to your personal circumstances and we will involve your family in the discussion, if you wish us to. Alternatively, we may assist you to identify a person who is able to advocate for you, in making an informed decision.

We also recognise that the decision to move can come at a time of crisis, due to ill health, an accident or a particular difficulty. Whatever your circumstances, whether you are planning ahead or struggling to cope, the Council will provide you with –

- Advice tailored to your personal circumstances about your housing options
- Support to enable you to make an informed decision
- Our commitment to deliver more housing that is suitable for older people or to adapt your home so that it is accessible and safe for you to live at home.



A great place to live and work

Contact us...

by telephone: 0300 300 5904

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

on the web: www.centralbedfordshire.gov.uk

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