



Central Bedfordshire Council Independent Living in Central Bedfordshire Consultation

Response to Formal Consultation

June 2015

1. Introduction

1.1 Background

Central Bedfordshire Council wants the best possible quality of life for all its residents and is committed to developing and improving accommodation with care and support for older people. The Council has begun development of Independent Living Schemes offering 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.

We are immensely proud of our first Independent Living Scheme, Priory View, Dunstable which will open in January 2016. It is a flagship scheme providing affordable accommodation for older people who wish to rent or part buy their home. As well as providing homes for local people, our first scheme will provide access to activities, restaurant facilities and care/support services. The scheme will be established on the basis of a strong, vibrant community.

1.2 Draft Allocation Policy for Independent Living in Central Bedfordshire.

The Council has drafted the proposed new Policy for Allocations to our new Independent Living schemes. The Council has undertaken a consultation to hear your views on whether the Policy is fair overall and likely to achieve the objectives.

The objectives of the Policy are to ensure that homes sold for shared ownership and for rent are allocated in a fair and transparent way, with local people who will benefit most from Independent Living schemes having the highest priority to move in.

There was a 4 week formal consultation period from 20th May 2015 to 15th June 2015.

Consultation forms were sent to the following:-

- 774 customers who have already expressed an interest in the scheme
- Members of Older Peoples Reference Group (O.P.R.G.)
- Members of Sheltered Tenants Action Group (S.T.A.G.)
- Members of Way Forward Panel

The formal consultation was managed via a formal consultation document. This was available in paper format; downloadable from the Central Bedfordshire Council's website, or was obtainable by telephoning or writing to the contact details provided in the letters to stakeholders.

Members of Central Bedfordshire Council and its staff were informed about the formal consultation and press releases were issued to the media to raise awareness of the consultation with Central Bedfordshire residents.

This report includes a summary of the feedback received via the consultation questionnaires which ended on 15th June 2015.

Further feedback has been received from stakeholders in addition to the formal consultation document. Please see appendix 3

2. Engagement

2.1 Events

Central Bedfordshire Council held two engagement events on 10th & 12th June; this was by invitation only and sent to 774 people who were on the Expression of Interest Register for Independent Living schemes in Central Bedfordshire.

There were presentations on:

- The building work so far
- Help to Buy Agent
- Allocation Policy
- Meeting the Scheme Manager

There were over 200 attendees at the event; these consisted of invitees and their family members. Visitors to both event days were encouraged to complete the Independent Living Allocation Consultation form. A consultation and Engagement Officer was available to assist visitors with access to the paper version or a laptop to do-it-online.

Comments received from the day are in appendix 2

3. Results of survey: Demographic profile

3.1 Consultation

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

244 people responded to the formal consultation.

Type of respondent:-

Housing Register Applicant (Older Person)	51	21.7%
Housing Register Applicant (General)	4	1.7%
Council or Housing Association Tenant	38	16.2%
Professional	13	5.5%
Town and Parish Council	2	0.9%
Resident of Central Bedfordshire (none of the above)	101	43.0%
Other	26	11.1%

Respondents in age groups

18-24	0	0.0%
25-34	1	0.4%
35-44	6	2.6%
45-54	16	6.8%
55-64	39	16.7%
65-74	69	29.5%
75+	99	42.3%
Preferred not to say or did not answer	4	1.7%

35.3% (82) of respondents stated that they had a disability, 59.5% (138) of respondents stated they did not have a disability and 5.2% (12) preferred not to say or did not answer.

90.6% (221) of respondents were White: British, 4.5% (11) of Respondents stated "Other Ethnic type" and 7.4% (18) of respondents preferred not to state or did not answer.

Note: Some respondents ticked more than one box.

Appendix 1 provides a full demographic statistical profile of respondents

4. Results of Consultation

4.1 Question Responses

The formal consultation was designed to capture both quantitative and qualitative data from respondents, with results summarised as follows (percentages are rounded up or down as appropriate):

Q1a. The Council propose that for initial occupancy, the minimum level of assessed Care Needs is 5 - 10 hours per week to be eligible to move into an Independent Living Scheme.

Do you agree with this minimum level of care/support?

Yes	131	53.7%
No	76	31.1%
Don't Know	37	15.2%

Q1b. Please explain your answer:

53.7% (131) respondents agreed with the proposed minimum level of assessed care needs. However, there is overwhelming support for the Council to adopt a more preventative approach to people; this implies a preference to provide accommodation to those people who do not have immediate care need in line with the preventative approaches for example:

"...at the moment my husband and I do not need any care at all but in the future who knows..."

"...Seems OK but how easy is it to be assessed to this level of care? I have heard from friends and acquaintance that it is extremely difficult to get assessed and to achieve ..."

This view is also consistent with those expressed during stakeholder events and in discussion with officers prior to the formal consultation.

Qualitative comments provided at '1b', by 37 of the respondents answering 'Yes' to Question '1a' seem 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

This high proportion of 'Don't know' responses suggests that the question was not well understood.

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, and instead have been drawn to the scheme as a lifestyle choice.

Having considered all of the free format responses to consultation, the proposed approach is that minimum Care / Support needs for the Low/No category should be set at 0-10 hours per week, on the basis that

- a) needs in this category are likely to average five hours per week, which is sufficient to achieve efficiency savings;
- b) that Housing Need criteria will allow officers to manage demand effectively; and
- c) that prospective residents support this.

Q1c. As per Q1a, the Council propose that the minimum requirement for support shall apply to the initial occupancy i.e. first sales and first letting. The Council propose that on subsequent re-lets and re-sales to an Independent Living Scheme that the minimum number of assessed care and support hours within the Low Need Category shall be 0 - 10 hours.

Do you agree with this proposal or would you suggest alternative minimum criteria?

Yes	148	60.7%
No	64	26.2%
Don't know	32	13.1%

Q1d. Please explain your answer:

60.7% (148) agreed with the proposal although a small proportion of respondents suggest that the criteria should remain the same as for initial occupancy.

Central Bedfordshire is a largely rural area with a high proportion of residents aged 65 years and over. We acknowledge and recognise that a majority of respondents are concerned that we, as a council continue to ensure that any policy safeguards prevention and is at the forefront of delivering our better offer for older people.

We recognise that there is a significant possibility that a resident's care needs may increase or fluctuate during their time at an Independent Living Scheme. We are committed to ensuring that the schemes maintain their vibrant community appeal, therefore all allocations will ensure that maintaining the balanced care profile of any scheme remains paramount.

The Draft Independent Living Allocation Scheme includes 3 criteria for Local Connection for Independent Living (LCIL) as set out below:-

Q2a. Do you agree with the following?

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 the period.

Yes	183	75.0%
No	38	15.6%
Don't know	23	9.4%

Q2a1. Please explain your answer:

75% (183) respondents agreed with the local connection to Central Bedfordshire as a result of their continuous residency in the area, However, some respondents felt that 3 years was too low and suggested that this should be 5 years or more across all the local connection criteria

The Council will focus on the balanced care profile, during allocation, in recognition of the requirement to support our growing older population. These criteria mean that we are able to ensure the needs of as many residents as possible are met.

Q2b Do you agree with the following:

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.

Yes	154	63.1%
No	51	20.9%
Don't know	39	16.0%

Q2b1. Please explain your answer:

63.1% (154) agreed with Criteria Two and the 5 years suggested. Many respondents felt that family connections are very important. A small number of respondents suggested that this broadens the criteria too widely and that schemes should be for Central Bedfordshire residents only.

The Council recognise that family and community are often at the heart of maintaining good health and can support wellbeing. The policy states that priority will be given to those applicants resident in Central Bedfordshire for more than 3 years

Q2c Do you agree with the following:

Criteria Three:

Applicant 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.

Yes	119	48.8%
No	75	30.7%
Don't know	50	20.5%

Q2c1. Please explain your answer.

48.8% (119) respondents agree that there should be a local connection to the area by family association; however, some respondents have stated that the qualifying length should be for 5 years or more across all the local connection criteria. Most respondents agreed that priority should be given to residents of Central Bedfordshire and in particular Dunstable.

The Council recognise that family and community are often at the heart of maintaining good health, and can support wellbeing. This criteria has the least priority, those applicants currently living in Central Bedfordshire will have precedence.

Q3 Section 3, page 9 of the Draft Independent Living Policy refers to applicants having a Local Connection to Central Bedfordshire, if you do not have a Local Connection you will be unable to live at Priory View.

Do you agree with this?

Yes	199	81.6%
No	28	11.5%
Don't know	17	7.0%

81.6% (199) respondents agreed with applicants having a Local Connection to Central Bedfordshire

The Council recognises the need for a Local Connection criteria related to eligibility.

Q3a. If you have answered No or don't know, please explain your answer:

Some respondents suggest allocations should be 'care needs', led and applicants should be resident in Central Bedfordshire.

We recognise the need for a local connection and the importance of the balanced care profile when allocating.

Q4. In the event that two or more applicants have equal priority, a decision will be made based on the distance each applicant is living from the Scheme. The applicant living closest to the Scheme will be offered the property; do you agree that the decision should be made on this basis?

Yes	136	55.7%
No	76	31.1%
Don't know	32	13.1%

Q4a. Please explain your answer.

55.7% (136) respondents agreed with using proximity to the scheme as final criteria where more than one applicant is eligible and their level of needs are identical. Some respondents suggested an alternative method based on length of residency in Central Bedfordshire and current housing with regard to possible isolation, together with care needs. Other respondents felt that there are a disproportionate number of sheltered schemes in Dunstable which they felt could lead to limited availability to others.

The Council recognises the value and benefits of remaining within the local community; this is something that stakeholders advised was important when developing the wider allocations policy, especially in relation to accommodation for older people. This criteria is consistent with allocating older persons accommodation in rural areas, which is set out in the current wider allocations policy

Q5. Do you feel that the balanced care profile suggested is the correct balance to ensure a vibrant community for all?

Yes	182	74.6%
No	33	13.5%
Don't know	29	11.9%

75.6% (182) agree that balance care profile will ensure a vibrant community for the 55 plus.

Q5a. If you have answered no or don't know, please could you tell us what you feel the profile should be?

A majority of respondents felt the principle of a balanced care profile is reasonable, but felt this would be difficult to maintain in practice. Some respondents felt there may be increasing care needs as residents grow older, inevitably shifting the balance to the higher needs criteria; and that it may prove difficult to maintain the ratios stated.

It is positive that over 75% of respondents supported the proposed balanced care profile, however we recognise that care needs may change. As stated within the document, this policy does not deal with re-lets/re-sales. When developing the re-let/re-sales allocations policy, the balanced care profile will be at the forefront of the process

5. Summary

5.1 In Summary

The majority of the 244 respondents agreed with the proposed Allocation Scheme for Independent Living in Central Bedfordshire.

Respondents agreed with the minimum assessed care needs, but felt it is important to have flexibility to allow for changing care needs.

Respondents also agree with the initial occupancy of first sales and first letting. Some also felt that the criteria should remain the same for subsequent re-lets or re-sales.

There was an overall positive response to having a local connection to Central Bedfordshire and that a minimum of 5 years or more should be applied across the criteria, to offer consistency.

Although respondents agreed with the distance suggestion, they felt that there were too many schemes near Priory View. Respondents suggested alternative criteria could also be how long a resident has lived in Central Bedfordshire, their care needs and also residents living in rural villages.

Appendix 1:

Results of Consultation: Demographic Profile of Respondents

Q: Type of Respondent	No	Percentage
Housing Register Applicant (Older Person)	51	21.7%
Housing Register Applicant (General)	4	1.7%
Council or Housing Association Tenant	38	16.2%
Professional	13	5.5%
Town and Parish Council	2	0.9%
Resident of Central Bedfordshire (none of the above)	101	43.0%
Other	26	11.1%

Q: Are you male or female? (please select one option)	No	Percentage
Male	81	35.1%
Female	147	63.6%
No Response	3	1.3%

Q: What is your age? (please select one option)	No	Percentage
18-24	0	0.0%
25-34	1	0.4%
35-44	6	2.6%
45-54	16	6.8%
55-64	39	16.7%
65-74	69	29.5%
75+	99	42.3%
Preferred not to say or did not answer	4	1.7%

Q: To which of these groups do you consider you belong?	No	Percentage
White / White British		
British	221	90.6%
Irish	4	1.6%
Any other White background	1	0.4%
Black/ Black British		
Caribbean	2	0.8%
African	3	1.2%
Any other black background		
Mixed Race		
White and Black Caribbean	0	0
White and Black African	0	0
White and Asian	0	0
Any other mixed background		
Asian / Asian British		
Indian	1	0.4%
Pakistani	0	0

Bangladeshi	0	0
Any other Asian Background	0	0
Chinese or other ethnic group		
Chinese	0	0
Any other ethnic background	0	0

Q: What is your religion?	No	Percentage
None	23	10.1%
Christian (All denominations)	170	74.6%
Buddhist	1	0.4%
Hindu		
Jewish		
Muslim		
Sikh		
Any other religion		
Prefer not to say	34	14.9%

Q: Do You consider yourself to be disabled	No	Percentage
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	82	35.3%
No	138	59.5%
Preferred not to say or did not answer	12	5.2%

Appendix 2

Key Messages from Priory View Events 10th & 12th June 2015 held at the Incuba Business Centre, Brewers Hill Road, Dunstable, Bedfordshire.

- Q** 7 attendees ask - Why do people need to have 5 hours care need per week as a minimum?
- A** **This is a draft** allocation scheme – please take your opportunity to comment via the consultation
- Q** How will the “distance” criteria work in allocation process?
- A** The ‘distance criteria will be used as a last resort tie-breaker where all other aspects of more than one applicants application are the same and there are no mitigating factors for the Independent Living Panel (ILP) to consider
- Q** Can I still have my current person come and do the washing and ironing for me?
- A** We have worked hard to ensure a value for money care provider on site, we would encourage residents to discuss their needs with them, before deciding.
- Q** I can't do my mum's garden anymore and the Council say that maintaining the garden is part of the rental agreement. What can I do?
- A** Customer referred to the Housing Estates Team to see what can be done.
- Q** Will my mum need an assessment for care? She had one a while ago for Home Care.
- A** If your mum is successful and offered a property, there will be an assessment as part of the allocations process to make sure the care provided is the type of care she will require at Priory View
- Q** Will my mum get financial help?
- A** There will be a financial assessment within the allocations process and help available from money advisers at upcoming events.
- Q** When will I know more about the costs?
- A** We are currently undertaking a valuation exercise which is being carried out by independent surveyors; we will advise you further once we have an answer.
- Q** I get care now and have been financially assessed. Will that assessment transfer If I move to Priory View?
- A** Assessment outcomes can vary depending on environment and circumstance. All applicants who may be offered a property at an Independent Living Scheme will need to be reassessed to ensure that they receive the right care, following their move.
- Q** I live in Luton, just on the border of Central Bedfordshire by the Hospital, what are my chances of getting a place?
- A** This will depend on the final agreed allocation policy. At present the proposal is that all applicants must have a local connection.

Appendix 3

Response from a Housing Association:

Eligibility

The eligibility criteria appears to be reasonable in terms of determining who can proceed with an application. The age limit is standard for retirement living accommodation. The local connection criteria 1, 2 and 3 appear reasonable in terms of giving priority to local people.

Financial Assessment

This area causes considerable concern. If the draft criteria is applied it is difficult to see who will be able to buy these flats. It appears that the shared ownership flats are to be kept for people on a very low income who do not currently live in their own homes. I do not understand why it would not be acceptable for existing home owners to be able to sell their homes and move in to the development as long as they have care needs. The service charges for a development like this will be high and only people with sufficient funds could even consider buying one.

I suspect that most of those interested in purchasing will have a home of their own which they will need to sell in order to purchase. I cannot see that there is a pool of older people who are currently renting, have care needs but want to buy a shared ownership property. There are no other similar schemes for wealthier home owners to purchase on the open market should they need care in this type of development so denying them the right to be considered is unfair. Will the family members be able to purchase on their elderly parents' behalf under a deed of covenant?

I think that the criteria set out will cause problems in selling your shared ownership units initially and in subsequent sales.

The financial assessment is designed to restrict access to those who can just about afford to live there. This will have an impact on the long term community where residents live in an exceptional building with a concentration of older people poorer people. The funding of the development may depend upon housing benefit to cover the costs.

Response:

There will be provision for current homeowners to sell their existing property and purchase a shared ownership property. Indeed, the Council will work closely to support people to enable them to downsize and sell their property, where they have a Care and/or Support Need.

The draft policy stipulates that applicants cannot own a property in addition to the property they own in an Independent Living Scheme. There is also currently no limit in the amount of savings a shared ownership applicant can possess, although the current HCA guidelines stipulate that those applying for shared ownership should not be able to purchase a similar property on the private open market. Independent Living Schemes are classed as affordable home ownership.

Any property purchased must be registered in the name/s of the resident/s living at the scheme. There are no barriers to family members purchasing on an applicant's behalf, however these restrictions apply.

Balanced Care Profile

I understand the BCP and feel that is well planned although potentially difficult to manage. It would appear that over time, there is a strong likelihood that places available for those with HIGH needs looking to move in will become more difficult to access as existing residents will inevitably move into the HIGH needs category. Therefore, there is a greater chance that newer residents are likely to have LOW to MEDIUM needs; this could impact upon the 'community'.

Response:

The Council acknowledge these concerns, together with those other stakeholders have raised around prevention.

Discretion

There is mention of changing the age for those renting and buying. As I understand it, once the lease says 55+ this cannot be changed? Will you really have this flexibility? Will this be written in to the lease agreements?

Response:

The issues around age restriction and discretion are currently under consultation. These could vary from scheme to scheme and are restricted by the initial purpose set out for each scheme. Where possible, discretion may only be applied in exceptional circumstances.

At first sight it appears terribly complicated and long winded. I can see that this bureaucracy is to try to ensure that those with the local connection and the care need are given priority. However, as a result, people who were interested in this development have decided that they are unlikely to even be considered for a property.

My understanding was that the initial publicity indicated that these properties might be available for those planning for their future needs but they now feel that there is no scope to plan as you can only be considered once you have a need. This will have long term implications for the 'thriving, active and supportive community' you are trying to achieve. For this to be sustainable I believe that you need to have a proportion of residents who are still fit and well and without specific care needs. There is a danger that the vision of 'independent living' will be lost if this policy is applied, given the emphasis on the care needs of the applicants.

Response:

The Council is committed to increasing the supply of Independent Living in Central Bedfordshire to meet the aspirations of those residents who wish to plan for the future. However, at this time, it is important that the local connection criteria are applied to all Independent Living Schemes. We acknowledge the concerns around care needs, together with those concerns that other stakeholders have raised around prevention.

A number of interested parties have said that they will not be eligible because they already have their own property. It is highly likely that anyone interested in the shared ownership properties will have a property to sell and will not meet your 'Housing Need' criteria. This is the area that causes me the greatest concern and I suspect that you

will have difficulty in releasing your shared ownership units unless you revise the criteria to enable current home owners to apply.

I also fear that the shared owner sales process may become inordinately long while a suitable applicant is found during which time debts will accrue to the owner or their estate. Leaseholders want to sell quickly to whoever meets the criteria and they will need the process to be swift and streamlined.

Response:

The eligibility relating to housing need is varied and current homeowners are eligible to apply under the proposed policy. We recognise that there will be applicants who may have a property to sell and the process will include support and guidance on how to achieve this.

An applicant may not have any housing need, but be able to move to a scheme because they have a Care Need. This point is explained at section “consistency – unexpected outcomes” on page 18 of the Policy. However, this will depend on the level of demand overall, and potentially on the level of demand at each level of care and/or support Needs, related to properties for rent and separately to properties for shared ownership.