

Older Person's Allocation Policy

Ceredigion County Council and its Partner RSLs recognise the need to cater for the specific housing demands of Older People in the County. The policy is designed to work in tandem with the Common Allocations Policy and Accessible Housing Allocations Policy. The policy is based on qualifying applicants making a positive choice to opt-in to the housing register for Older People's housing. It neither precludes applicants from participating in the other housing registers, nor assumes all applicants who satisfy the criteria for Older Persons Housing will want or need to apply.

Policy drivers

The Older Person's Allocation Policy has been developed in line with a number of International, National and Local policy drivers:

The **United Nations Principles for Older Persons** - Adopted by General Assembly resolution 46/91 of 16 December 1991, states the following high level principles reflected in the policy.

Independence

1. Older persons should have access to adequate food, water, shelter, clothing and health care through the provision of income, family and community support and self-help.
2. Older persons should have the opportunity to work or to have access to other income-generating opportunities.
3. Older persons should be able to participate in determining when and at what pace withdrawal from the labour force takes place.
4. Older persons should have access to appropriate educational and training programmes.
5. Older persons should be able to live in environments that are safe and adaptable to personal preferences and changing capacities.
6. Older persons should be able to reside at for as long as possible.

Participation

7. Older persons should remain integrated in society, participate actively in the formulation and implementation of policies that directly affect their well-being and share their knowledge and skills with younger generations.
8. Older persons should be able to seek and develop opportunities for service to the community and to serve as volunteers in positions appropriate to their interests and capabilities.
9. Older persons should be able to form movements or associations of older persons.

Care

10. Older persons should benefit from family and community care and protection in accordance with each society's system of cultural values.

11. Older persons should have access to health care to help them to maintain or regain the optimum level of physical, mental and emotional well-being and to prevent or delay the onset of illness.

12. Older persons should have access to social and legal services to enhance their autonomy, protection and care.

13. Older persons should be able to utilize appropriate levels of institutional care providing protection, rehabilitation and social and mental stimulation in a humane and secure environment.

14. Older persons should be able to enjoy human rights and fundamental freedoms when residing in any shelter, care or treatment facility, including full respect for their dignity, beliefs, needs and privacy and for the right to make decisions about their care and the quality of their lives.

Self-fulfilment

5. Older persons should be able to pursue opportunities for the full development of their potential.

16. Older persons should have access to the educational, cultural, spiritual and recreational resources of society.

Dignity

17. Older persons should be able to live in dignity and security and be free of exploitation and physical or mental abuse.

18. Older persons should be treated fairly regardless of age, gender, racial or ethnic background, disability or other status, and be valued independently of their economic contribution.

The Welsh Assembly Government adopted a **Declaration of Rights for Older People in Wales** in July 2014. The Declaration, which has received cross-party support in the National Assembly for Wales, is based on the UN Principles for Older Persons and sets out what older people have said they value and what rights they feel would support and protect them:

- I have the right to be who I am.
- I have the right to be valued
- I have free will and the right to make decisions about my life
- I have the right to decide where I live, how I live and with whom I live
- I have the right to work, develop, participate and contribute
- I have a right to safety, security and justice

Whilst older age does not necessarily bring the need for accessible housing, there is evidence that the older population has a greater need for accessible and adapted accommodation. As such the **UN Convention on the Rights of Persons with Disabilities** underpins the policy also:

Article 19 - Living independently and being included in the community states that parties to this Convention recognize the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community, including by ensuring that:

- a. Persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement;
- b. Persons with disabilities have access to a range of in-home, residential and other community support services, including personal assistance necessary to support living and inclusion in the community, and to prevent isolation or segregation from the community;
- c. Community services and facilities for the general population are available on an equal basis to persons with disabilities and are responsive to their needs.

In addition to the high level strategies and accords the Older Persons Allocation policy aims to work to the ambitions stated in **Phase 3 of the Strategy for Older People in Wales: Living Longer, Aging Well (2013 – 2023)**. Most notably to:

- Develop communities that are age-friendly while ensuring older people have the resources they need to live;
And
- To ensure that future generations of older people are well equipped for later life by encouraging recognition of the changes and demands that may be faced and taking action early in preparation.

On a wider front the Older Persons Allocation Policy shall integrate with the principles of **Prudent Health Care**, adopted by the NHS in Wales. The principles are that a service or individual providing a service should:

1. achieve health and wellbeing with the public, patients and professionals as equal partners through co-production
2. care for those with the greatest health need first, making the most effective use of all skills and resources
3. do only what is needed, no more, no less; and do no harm
4. reduce inappropriate variation using evidence based practices consistently and transparently.

Alongside these main themes, the Older Person's Allocation of Accommodation Policy has been designed to help meet Ceredigion County Council's objectives set out in the **Service Strategy for Older People (Care and Wellbeing) 2014**, specifically:

- Improving the information and advice that is available to enable older people to help themselves, and to empower older people to make informed choices about their care and support
- Ensuring that older people have access to a timely, proportionate and integrated assessment
- Improving the range of preventative services including awareness and take-up of assistive technology such as tele-care / tele-health
- Increasing the choice of living options for older people to ensure good quality accommodation and supported accommodation options such as extra care are available so that the need for more intensive forms of support are delayed or prevented.
- Work with housing developers and RSLs to help secure future developments that meet the requirements of our older population, build on recent surveys and look to deliver more flexible tenure options and recognise the need for more bungalows if appropriate

At a housing –specific level, the policy will feed into a number of specific actions set out in *Housing for All: A Local housing Strategy for Ceredigion* most of note:

Challenge D – *To have county-wide services and housing stock that enables people to maintain their independence in an affordable and sustainable way. Taking into account the changing demography of the County.*

- Provide sustainable housing options for older people through corporate working
- Establish a corporate approach to addressing housing suitability for all client groups
- That new housing supply meets the identified needs of the County.

The Strategic Aims and Objectives

The Older Persons Allocation Policy seeks to ensure that applicants are enabled to live healthy, active and independent lives in part through the provision of suitable housing. Whilst old age does not necessarily bring health and support requirements, there is often a correlation between growing older and the need for physically adapted and / or supported housing solutions. This policy underpins the part social housing can play in meeting the wider health and social care needs of our community.

In addition the policy aligns with the high level aims of the Common Allocation Policy, namely:

- To strengthen the role that social housing has in community sustainment, especially in a rural county such as Ceredigion.
- To work to deliver housing to people most in need, whose housing options cannot be met outside of the Social Housing sector
- To streamline the Housing register application process for customers and partner agencies, with a view to managing peoples' expectations of, and aspirations towards Social Housing.

Strengthening Communities

The Older Persons Allocation Policy seeks to strengthen communities through a number of policy statements:

- Recognise an applicant's local connection with Ceredigion or the adjacent community councils in Carmarthenshire, Pembrokeshire and Powys, thus ensuring that the housing resources in Ceredigion are targeted at older people from the County
- Seek to maintain and strengthen applicants' independence and resilience by providing a mechanism for acknowledging the importance of maintaining a local connection to a specific locale within the County.
- Promote sustainable communities by allocating housing from each of the three 'reasonable preference' bands (A –C) via a quota system – Band A 40%, Band B 30% and Band C 30%,
- Remove the assessment of personal equity/ savings for applicants applying for Older Person's housing. This is a reflection of the need to ensure access to sustainable accommodation in older age should be available to people in greatest need (as adjudged via the 'reasonable preference categories'), regardless of personal finances.

Delivering on Housing Need

The Older Persons Allocation Policy builds upon the legislative framework imposed by the Housing (Wales) Act 2014 and the 'reasonable preference' categories therein. In addition the policy aims to ensure poor standards of housing are not the driver to

apply for Social Housing, and that the system allows for a proactive approach to raising housing standards in Ceredigion rather than expecting the Social housing Sector to be the only solution.

- Recognise applicants with the greatest need through the use of one or multiple 'reasonable preference' categories.
- Ensure that poor housing standards in the private sector are addressed through the application process, and alleviate the demand for Social Housing in general.
- Enable applicants to downsize into appropriate sized housing, and thus mitigate the impact of Welfare Reform for people between 55 years and State Pensionable age.
- Actively assist the Social housing stock in the County to meet the needs of the wider population by providing an avenue for social tenants to secure suitable adapted and supported accommodation whilst freeing up larger accessible housing units they currently occupy. This is in conjunction with the Accessible Housing register, that denotes both the accessible housing stock and the criteria for applicants registering for accessible housing.

Managing Expectations

In tandem with the Common Allocation Policy the policy underpinning the Older Persons Register aims to provide applicants with a clearer understanding of the likelihood of their obtaining a social rented tenancy and offer a fairer and simpler method of prioritising applicants. Alongside this requirement to be clear and fair, the policy underpins the wider remit of being clear on the standards expected of applicants, both in prior behaviour and intent. The proposed policy will:

- Use a banding system, rather than points, to offer a clear message to applicants as to their position on the list, and reduce the occurrence of 'point chasing'.
- Introduce an element of 'time-waiting' over and above the date of entry onto the general Needs Housing Register, to ensure time on the register prior to an identified need being highlighted for Older Person's accommodation, does not adversely penalise applicants with a more urgent need that have not applied before.
- Take into account persistent anti-social behaviour that would be serious enough to preclude an applicant or a member

Applicable Housing Stock

The Policy covers Sheltered Housing Schemes and Extra Care Housing. At present the current Extra Care scheme in Ceredigion requires additional 'Expressions of Interest' information from health and social care, but applicants will need to be registered on the Older Persons Accommodation Register as a first stage in the referral process. Leased retirement flat schemes, which are owned and managed also by Social Landlords, remain outside of this policy's remit as a result of the

leasehold agreement. Applicants are able to explore Leasehold options at the same time as expressing an interest in Older Persons Accommodation register.

Age

The Older Persons Allocation Policy can apply only to people over the age of 55 years. Whilst the sheltered housing and extra care house can offer a solution for people outside of the age catchment – with accessibility and / or support requirements – this policy is only applied to an applicants who meet the age threshold. In the case of people applying with a partner or other family member, one applicant must satisfy the age threshold to qualify for consideration.

Opt In

The Older Persons Housing register can be accessed by all persons who are 55 years or older. If an application is from a household, then one or more applicants must reach the age criteria. Applicants should be able to demonstrate their age. Applications will not be accepted by households who would lead to accommodation being overcrowded.

Applicants on the Common Housing Register will need to apply for inclusion on the Older Person's Housing register, as it is an opt-in policy. This

Choices

The accommodation options on offer are limited to a number of schemes within the County, and each has a scheme identity. As such the policy allows for applicants to select individual schemes by name – up to three choices – or by area or apply for county wide. This should enable applicants to be clear about their preferences, expedite the allocation process due clear preference information and enable prospective applicants to be given realistic information regarding the level of demand for individual schemes.

In tandem with the Common Allocation Policy, applicants shall be placed into band F if they refuse more than one reasonable offer. This is based on the same criteria used for all allocations across all Housing register applications.

Time starting

The Common Allocation Policy introduces the concept of 'time waiting' to the allocation of accommodation. In tandem with this policy decision the Older Persons allocation policy will use the date of application for inclusion on the Older Person's Housing Register as an allocation tool. If a Common Housing Register applicant becomes eligible to apply for inclusion on the Older Person's Housing Register, by virtue of age they will be contacted by Housing Register Team. They will need to proactively opt in to the scheme. There start time for the Older Persons register will be from application. This does not affect their time waiting on any other register. It is

possible that applicants will have a number of different start times depending on what registers they have applied to join.

Allocation Process

Applicants shall be assessed on the basis of the criteria for inclusion on the Older Person's Housing Register:

Specific Older Person's Housing Criteria:

1. One or more member of the household is aged 55 years or older.
2. The household will not exceed the maximum occupation criteria for the largest home offered under the Older Person's Allocation Policy. This is a County-wide criterion, taking into consideration that all schemes have varying sized accommodation on offer.
3. Applicants have made a positive choice to apply for inclusion on the register.

Identifying Housing Need

The proposed policy follows legislation as set down in Part 1 the Housing (Wales) Act 2014. The Reasonable Preference Criteria are as follows:

- (i) People who are homeless within the meaning of Part 2 of the Housing (Wales) Act 2014
- (ii) people who are owed a duty by any local authority under section of the Housing (Wales) Act 2014 or who are occupying accommodation secured by any local authority under section
- (iii) people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;
- (iv) people who need to move on medical or welfare grounds, as a result of their present accommodation having a detrimental effect on their health and/or welfare.
and
- (iv) people who need to move to a particular locality in the area of the local authority, where failure to meet that need would cause hardship (to themselves or to others).

Whilst the policy recognises the reasonable preference criteria, additional needs have been identified locally. These are:

- Under occupation in social rented accommodation within Ceredigion, to address Housing Benefit issues arising from Welfare Reform.
- Adapted housing occupied by tenants without the need for an adapted property, to enable the current stock to better target those in need.
- Applicants who are due to be discharged/ move on from supported housing and/ or Health or Social Care establishments. Whilst these applicants traditionally come through homelessness, this addition will allow for a better planned move on.
- Applicants who are in fulltime (or equivalent) employment, within Ceredigion for five years at the point of application, but who satisfy the income thresholds set for Social Housing.

Assessing Reduced Preferences

The proposed policy offers a more robust assessment of applications in relation to the reduced preference criteria. The criteria are as follows:

- A history of arrears in Social Housing and Local Authority housing, up to and including the past five years. Although this applies also to the Private Rented Sector, in recognition of the additional resources necessary to include the Private Rented Sector, rental history would be limited to the current Private Rental address and (if within the last five years) the previous Private Sector tenancy also.
- A history of persistent Anti-Social Behaviour that is judged serious enough to preclude an applicant or a member of the applicant's household from sustaining a tenancy, as per the
- The refusal of one reasonable offer, assessed as 'suitable' in accordance with Housing Wales, Homelessness (Suitability of Accommodation) (Wales) Order 2015 This standardises the manner in which refusals are dealt with between homelessness and general needs applicants, as well as acts upon the growing demand on Social Housing, and the need to allocate based on need rather than choice.
- No local connection as per the allocations policy (excluding Homelessness applicants with full duty)
- Applicants whose current application form is under investigation for HHSRS issues. Applicants remain within Band F up to and including a period of nine weeks.

- Applicants who have deliberately worsened their housing conditions with a view to securing a socially rented property.

Assessing for Local Connection

- The policy strengthens the criteria for Local Connection and aligns with the s.106 Local Connection policy. To satisfy Local connection criteria an applicant will be any of the following:
- A person who has resided in the Local Authority area for five years from the date of application to the Register. The five year period aligns with the s.106 criteria, but raises the threshold by insisting that the applicant has resided in the County for five years immediately prior to the application being submitted. This ensures that the housing needs of existing residents are taken into consideration first.
- In recognition of the importance of supporting economically sustainable communities, a person who is presently employed In Ceredigion, on a full time equivalent basis, but excluding seasonal contracts, for the previous three years, from the date of application.
- Has close family – defined as parents (or parental equivalent), or brothers and sisters, or children in Ceredigion, resident within the County for at least 10 years.
- Ex-service personnel or a serving member who has lived in Ceredigion for five years (at any point).

Allocation

- In order to ensure the best use of the housing stock, management decisions regarding transfers within and between partners of the Common Allocations Policy and the requirement to address temporary accommodation needs within an area will be considered in conjunction with the banding policy.
- An allocation to an applicant from the Older Persons Housing register will only be made to the specific schemes and properties designated as older persons housing.
- The decision to apply a specific banding label to an individual property will be made on the day the Housing Register Team is informed that it is available for allocation. Partner RSLs will be notified of the band following an assessment of their quota values at the date of notification. The property shall be made available to the applicants from the band that is furthest from its annual target percentage. This will ensure that the global target for all bands is met through the combined effort of each partner, through their own quota schedule.

- Applicants have made either specific scheme choices OR opted for area OR County wide inclusion. This will ensure that offers are based on the a more realistic assessment of what an applicant needs and demands. If an applicant has made the decision to opt for a Ceredigion-wide choice, then refusing an offer due to the scheme placement will not be viewed as a reasonable refusal.
- Applicants accept the conditions inherent on each scheme in relation to pet ownership. Policies regarding pets and other specific scheme requirements will be made available at the point an applicant makes their choice.
- Applicants in Bands A – C are in the position to be considered in the first instance, for Older Persons housing (.This is a result of them satisfying one or more reasonable preference categories, or fulfilling the criteria for an agreed locally agreed target group.
- Applicants in Band D – E are eligible for other forms of Affordable Housing options, as well as Older Person housing, and will be signposted to the Affordable Housing register. Applicants will be made aware of the additional options available.
- Applicants who are in the Reduced Preference band (F) are entitled to an annual review of their circumstances, to enable any changes in circumstance (i.e. local connection criteria, and arrears account) to be adjusted as per the policy.
- Applicants who have rent arrears involving a partner Landlord shall rely on their confirmation that repayment terms have been met consistently within the previous 12 months. The terms of repayment are at the discretion of each Registered Social Landlord.