

Policy for Development and Allocation of Models of Care and Accommodation in Wirral

Adult Social Care

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1. OVERVIEW

Health and Social Care services play an important role in enabling people with care and support needs to maintain independence and keep well. A key component to this is the provision of accommodation-based care and support services with a clear and transparent process for the allocation of accommodation with care and support provision known as Extra Care Housing.

The Council is committed to working effectively and at pace to allocate tenancies to identified people with an assessed & eligible need under the Care Act, and has introduced an allocations process which can be seen in Section 12

2. SCOPE

This policy details joint work with Adult Social Care and Strategic Housing and Regeneration who use data and intelligence to inform the need to develop new models of care and accommodation in the borough to meet its statutory duties.

The policy also outlines our methodology for working with developers, registered housing providers and social work teams to ensure any new or existing developments are built or remodelled to our Wirral Specification, are affordable and deliverable within agreed rent levels. section 6 details the model.

Models of Care and Accommodation in Wirral includes schemes designed:

- Specifically, for people with Learning Disability and Autism or Mental Health needs known as **Specialist Extra Care**
- Older People which are known as **General Extra Care**
- **Hybrid Care and Accommodation schemes**, which may be intergenerational or mixed models on one site

3.1 DEFINITION OF SPECIALIST SUPPORTED HOUSING

Supported housing is typically defined as a housing service where housing, support and/or care services are provided to help people to live as independently as possible. Supported housing provides homes for a wide range of people including older people, people with a learning disability and autistic people, people with mental health related needs, vulnerable young people and people who have experienced homelessness.

Specialist Supported Housing is designed, structurally altered, refurbished, or designated and to be made available to be occupied by residents who require specialist care or support to enable them to live or adjust to live independently. This support must be of high level in comparison to the support required in residential care, if that was the alternative.

This type of accommodation is to be provided by Registered Housing Providers under agreement, and with the approval of the Local Authority, and the rent charged must be in agreement with the Local Authority. Therefore, people in the accommodation must meet both the care act eligibility criteria and the criteria for supported living/specified exempt accommodation, where care support or supervision is provided by or on behalf of the landlord.

For Specialist Supported housing this would be a high level of support and where the accommodation has been commissioned by the Local Authority or Health service with bespoke adaptations of the accommodation.

In Wirral this accommodation is generally for people aged 18-64

3.2 DEFINITION OF GENERAL EXTRA CARE HOUSING

This usually consists of purpose-built or adapted flats or bungalows with a **medium to high** level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff. Facilities may include a range of services like health care rooms, restaurants or hairdressing and beauty space, dependent on both need and other local amenities. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Residents live in a self-contained flat, with their own front door, but staff are usually available up to 24 hours per day to provide personal care and support services. These are tailored to the resident and can include help with washing, dressing, going to the toilet and taking medication as part of a package of care. Domestic help, such as shopping and laundry, and meals may also be provided as part of a wider package of care.

3.3 Description needed of hybrid model

3c. Common features of Extra Care/ assisted living accommodation include:

- help from a scheme manager (warden) or a team of support staff (employed by the housing provider)
- 24-hour emergency help through an alarm system (provided by the housing provider, and responded to by the care provider)
- social activities arranged for the community (by both the the housing and care provider)
- a minimum age for residents, usually 55, dependent on funds that are used to contribute to the development of any scheme e.g. Homes England funding
- self-contained flats
- communal lounges allowing you to socialise as and when you feel like it
- Some extra-care housing is available to buy or rent privately and is available from the local council following a care needs assessment.

4. STRATEGIC COMMISSIONING

Adult Social Care Commissioning Leads and the Local Authority Strategic Housing meet on a regular basis to plan and review developments of future care with accommodation services. Services will be developed based on identified unmet need, population profiles and the need for current eligible residents to have access to more modern housing and care solutions. Decisions in relation to the decommissioning of services, (as outlined in the Market Position Statement) will also be informed from these meetings.

A jointly produced housing gap analysis is produced and reviewed on an annual basis and published here [Extra Care Housing Gap Analysis | wirral.gov.uk](https://www.wirral.gov.uk/extra-care-housing-gap-analysis) and a strategic housing management assessment (SHMA) is published here [H14 - Wirral SHMA Update Main Report October 2021](#)

Some key objectives are:

- To work with registered housing and social care providers to identify unmet need for care and accommodation purposes and use that information to plan both the development of new schemes and the subsequent decommissioning of others
- Promote, sustain, and improve the independence of people through the development of accommodation models that meet need and improve the housing available for local people with either a disability or who are from an ageing population
- Deliver efficient and effective processes for the identification of accommodation vacancies.
- Ensure transparency in the planning and development of accommodation-based services.
- Inform commissioning of accommodation-based service based on current capacity and future demand.
- Engage providers of care and housing with the latest technology to support services.
- Make recommendations in relation to proposals for new developments of specialist housing in Wirral.
- Ensure the financial targets, and identified efficiency initiatives for Care and Accommodation are monitored and achieved.

5. OPERATIONAL CARE, ACCOMMODATION AND SPECIALIST EXTRA CARE PANEL (SSH)

The role of the panel is to identify people with a care and accommodation need for specialist extra Care and move to the waiting list and to work with commissioners to drive intelligence to inform future commissioning requirements. To discuss escalated cases to identify suitable placements

- Commissioning Lead Specialist LD Housing and Supported Living
- Senior Manager Cheshire & Wirral Partnership Integrated Disability Service
- Practitioner representative
- Senior Manager Cheshire & Wirral All Age Disability – Mental Health
- Senior Manager Adult Social Care Team

The board will be responsible for allocations of SSH as follows

- Ensuring the Care, Accommodation and Specialist Extra Care Panel remains relevant to the business and partner agencies and adheres to legislative requirements and/or best practice.
- Implementation of the Cheshire and Merseyside LD and Autism housing strategy
- Consider proposals for development of specialist housing and informing developers, Registered Social Landlords (RSLs) and care providers of its decisions in relation to proposed development in Wirral.
- Provides transparency to key stakeholders including people who use services, care and support providers and practitioners on the commissioning and decommissioning process.
- Ensure effective planning for appropriate accommodation services to meet the needs of individuals with care and support needs.
- Ensure the accommodation for individuals with care and support promotes and maintains independence and is of an agreed communicated standard.
- Communicating information about the Care and Accommodation to stakeholder groups as necessary, to build and maintain commitment.
- Receives intelligence on why placements breakdown and available resources (housing and care options)
- Provides feedback to CAT / the service and frontline practice about availability and stock.
- Identifies resource gaps and uses the intelligence to inform future decommissioning and commissioning strategy.
- Identify new commissioning opportunities.
- Providing feedback to providers and ensuring stronger compliance from providers when advising on placement availability.
- Use information and data to inform planning for complex cases, links to Transforming Care Programme.
- Ensure people comply with existing systems and established processes.

Membership will be kept under review to ensure continuing relevance and, where appropriate, other parties invited to be represented on a need's basis. Quoracy will be carried out with one representative from each of the partner agencies.

6. EXTRA CARE HOUSING MODEL

Core Principles

Extra Care Housing enables people who meet the Extra Care and care act eligibility criteria to live in a home of their own in a designated development, with 24-hour care and support services on site.

Extra Care Housing is not intended to be a substitute for sheltered housing, flexible community support services or supported living housing. Instead, Extra Care Housing is intended to complement other types of provision, particularly for those who are unable to continue living in their own homes but wish to live more independently with the right care and support available on site. Extra Care Housing can be a community-based alternative to residential care, or other shared schemes. The dependency mix of residents will vary for each scheme.

People who move to live in Extra Care will have an assessed eligible need under the care act 2014, and require the care and support provided in the Extra Care schemes. Key features and principles that modern Extra Care Housing should include are as follows: -

- a) To provide accessible specially designed housing that enables independent living for older people and those with physical or learning mental health disabilities.
- b) To explore and include, where appropriate, assistive technology.
- c) To enable people to live safely in their own apartments and to monitor those who have dementia or other mental health problems.
- d) To provide communal facilities to allow community activities to be organised and to provide other services (e.g., a café/restaurant, assisted bathing, support to work); sensory room, communal kitchen, dining area these should be agreed for each scheme as requirements will vary.
- e) To provide flexible 'round the clock' 24-hour emergency and unplanned care, delivered by a consistent on-site care team.
- f) To provide a mixed community including those with different levels of ability, that can include the provision of apartments with different tenures and number of bedrooms.
- g) To create an environment that is enabling and supports best reablement practice.
- h) Facilities which enable the care and support needs of residents to be met efficiently and safely. To support and enable people to find privacy, comfort, support, and companionship.
- i) To be a resource for the local community, both developing relationships to bring the community in as well as opportunities for tenants to integrate with activities outside of the scheme.
- j) To provide support to work based and employment work placements, voluntary work opportunities and to 'skill developing' activities.

Wirral Extra Care housing model can be found here: [020321 ECH Model App1 FINAL.pdf](#)

7. ALLOCATIONS

This section details the procedure by which people applying for Extra Care Housing in Wirral are assessed for Care needs and accommodation, if eligible, allocated appropriate available accommodation with care and support.

This includes all Extra Care schemes for General and Specialist. This involves people being identified as eligible for Extra Care. All people being considered for allocation of extra care must have had an assessment under the Care Act 2014 and be eligible for services. This includes people who may wish to purchase an apartment within a scheme where this is available, as all people in the scheme will be required to financially contribute to the commissioned background support.

Adult Social Care Assessors will identify and assess the needs of adults with Learning disabilities, Autism and or Mental Health and prioritise to available vacancies within Extra Care Housing in Wirral.

The assessment teams will ensure that there is a supported case recording of eligibility and discussion on charging, prior to consideration as part of the allocations process. This will be included in any communications with applicants.

The process of allocating properties will be undertaken by a digital process, and with final allocation considered and approved by a Senior Managers from both Adult Social Care assessment and Commissioning, Contracts and Quality Team. This is to ensure that all allocations are of people who are eligible for service are considered for available placements and prioritised accordingly.

A panel can be coordinated at times of high demand for allocation for new schemes, consisting of key partners who all have an important role in ensuring that both initial and subsequent lettings and ongoing voids are managed efficiently and effectively.

Key partners represented as part of the Allocations Process are, Adult Social Care Providers, i.e., Cheshire and Wirral Partnership (CWP) Registered Social Landlord/Housing Provider, and appointed care providers. The allocation process has been built within the core Care Management System of the Social Worker Provider (Liquid Logic).

Extra Care Housing offers residents the security and privacy of their own home with a range of facilities on the premises. Within Extra Care schemes, the Allocations Process aims to ensure that residents will have a range of dependency levels which are reflected in the care and support service specification and are as follows. It is critical that people are prioritised who have a medium to high need, given the “extra” care element, which is equivalent to a care home setting.

General Extra Care

20% of residents who require low levels of care and support (0 up to 5 hours per week)

40% of residents who require medium levels of care and support (5 up to 15 hours per week)

40% of residents who require high levels of care and support (alternative to residential care) (15+ hours per week)

Depending however on the number of cases and the priority of applicants, this remains flexible to respond to demand. The Social Work team should review the current level of need in each scheme as per above, to ensure where possible the optimum balance is achieved and maintained.

8. NOMINATIONS AGREEMENT

Where the Council strategically supports an extra care scheme, this would be on the basis of a requirement for 100% Council nominations from the Extra Care waiting list to the scheme, which will be formally agreed through a Nomination Agreement signed by Wirral Council and the Housing Provider.

This will include homes available for rent, Shared Ownership and Homebuy (where applicable). For these schemes, the Council, via the relevant NHS Trust will be entitled to 100% nomination rights on the first let of a property.

This allows the Council to provide nominations within a timescale of three months before the practical completion of a new scheme and three months from that date to allow a smooth transition of new residents into the scheme. The Council will have 100% nomination rights for subsequent re-letting of void properties.

The process by which nominations are fulfilled is detailed in sections 7 and 16 of this policy. It seeks to ensure that properties are let/relet within a maximum of 28 working days after notification of a vacancy by the relevant landlord to the NHS Trust. This is a maximum target, and the process provides more detailed targets as to how this would be achieved.

The suggested target is for the Housing Provider to be able to make an offer of a tenancy within 10 working days of a nomination and within 15 working days of initial notification. 6 If a nominee fails to take up an offer or the landlord does not make an offer, then the nomination process is repeated until the vacancy is filled.

Within the allocations process if the relevant NHS Trust is unable to make a nomination to the Housing Provider, then the Housing Provider may exercise its right to make an allocation, however the suitability of the applicant must meet the eligibility criteria for extra care housing and must be agreed with the relevant NHS Trust's responsible officer. All tenants of Extra Care are required to be assessed for a financial contribution to meet the costs of the available on-site care that responds to emergency and unplanned care calls around the clock.

This must be part of all tenancy agreements on these sites. In the event of there being insufficient nominees available for the first letting of a scheme and where the Housing Provider is unable to provide a suitable nomination then, in accordance with the nominations agreement, the Council may nominate a suitable applicant who is registered on the Council's Housing Register who has an assessed need. This may be by advertisement on the Property Pool Plus system.

9. ELIGIBILITY CRITERIA FOR EXTRA CARE ACCOMMODATION

Extra care housing is designed to accommodate people who need to be able to access care and support over a 24-hour period based upon assessed individual need and therefore not all interested applicants will qualify for this type of housing. To be eligible for Extra Care Housing, applicants:

- Will have a local connection with Wirral through residence, family, or employment; and or
- Will be adults with care and support needs who meet the eligibility criteria under the Care Act 2014; and, or
- Be an older carer with a son, daughter or dependent with a learning/physical disability who requires care and support.
- Must agree to be financially assessed to determine if they should make a contribute towards the 24-hour support that is available. The 24-hour support is part of the tenancy agreement and is not negotiable as it is a fundamental part of Extra Care housing.
- Will have an identified housing need for Extra Care.
- For general Extra Care couples are eligible for Extra care where both parties meet the criteria outlined below. OR if only one of the only one of the couples meet the criteria, then in addition the spouse or partner of the applicant should normally be aged 50 or over though cases will be considered on a case-by-case basis).
- For **general Extra Care** - will need to be aged 55 years or over (however, someone below this age with a long-term disability, for example following a stroke, could be considered for the rented units on a case-by-case basis); the responsible officer for allocations would need to check the particulars of the scheme.
- Applicants from the Councils Housing Register who have an assessed need can be considered for Extra Care Accommodation when there are insufficient nominees available on the Extra Care Waiting List where they would benefit from Extra Care accommodation.

10. WHO WILL NOT BE ELIGIBLE FOR EXTRA CARE ACCOMMODATION?

Applicants for extra care housing may not be eligible for accommodation if one or more of the following applies:

- They do not meet the eligibility criteria specified in the Housing Act 1996 which states that local authorities must consider whether applicants are eligible for housing assistance. An applicant may be ineligible due to their immigration status or, based on unacceptable behaviour making them unsuitable to be a tenant.
- Appropriate care or support to meet the needs of the applicant cannot be provided (see Point Maximum Dependency).
- They do not meet the Care Act Eligibility Criteria when the Council have sufficient nominations for the scheme.

11. APPLICATIONS FOR EXTRA CARE HOUSING

Referrals for extra care accommodation should be directed to Central Advice and Duty Team in the Single Point of Access (SPA). A full assessment of applicant's health and social care needs will be carried out to determine eligibility. An Extra Care Housing application (appendix A) is to be completed and signed off by a senior manager this will include.

- Where additional information is submitted by relevant professional which may include a therapeutic assessment undertaken by an OT this will be included in the Extra Care Housing Application
- Recommendation for specific schemes
- Acceptance of the requirement to be assessed for a financial contribution to the care provision and commitment to pay for any contribution determined.
- Acceptance that the 24/7 is a condition of the tenancy.
- Confirmation of the ability of the applicant to sustain independent living in extra care housing.
- Confirmation of the level of need (high /medium/low)
- Consideration of any other housing alternatives to Extra Care housing where there is no availability.
- Applicants' needs for specific property types and whether a particular floor is required or a property with full disability provision is required in addition, the applicant may be required to complete a more detailed housing application form to enable the housing provider to complete further checks prior to being able to offer a tenancy.
- For applicants who are interested in both shared ownership and rented accommodation, information will be shared with the Housing Provider, and where it is deemed that general needs accommodation may be an appropriate option for rehousing an application from for Property Pool Plus will be completed on behalf of the applicant.

An applicant's preference for a particular scheme will be noted on the Extra Care Application Form and whilst a guarantee of a particular preferred scheme cannot be made preferences will be taken into consideration in allocating vacancies wherever possible.

Applicants being added to the waiting list will be encouraged to consider as many schemes as possible, which would be considered suitable to meet their individual needs. Applicants who do not qualify at this stage will be informed by letter from the relevant NHS Trust within 10 working days of the application form being signed off and advised of alternative housing options.

The list of applicants accepted as eligible for Extra Care housing is called the 'Waiting List'. This is held in the core care management system and will be maintained by the Extra Care Co-ordinator for General Extra Care and CWP Trust for specialist Extra Care. Extra care vacancies are offered on the basis of need, urgency, and availability rather than length of time waiting. It is important that the expectations of applicants are not raised unrealistically.

12. EXTRA CARE ALLOCATION

Prioritisation Upon notification of a vacancy, the Extra Care Co-ordinator or CWP Trust for specialist Extra Care will consider the eligible applicants on the waiting list in relation to most suitable schemes to meet individual's needs. Preference for ground floor vacancies will be given to applicants with poor mobility to enable them to visit the laundry, dining room, Scheme Manager's office and other amenities on the ground floor. Preference for apartments nearest to the amenities to be awarded to the following applicants:

- Applicants with phobias to lifts or heights.
- Applicants requiring quick access for Scheme Manager/Social and Health Care Staff
- Applicants who are visually impaired Preference for first/second floor accommodation will be given to applicants who would feel vulnerable on the ground floor. If a flat has been specifically adapted / converted, preference will be given to re-letting the property to an applicant with a demonstrated need for these aids and adaptations.

The Extra Care Co-ordinator or CWP Trust for specialist Extra Care will endeavour to ensure that, whenever possible, applicants enter Extra Care housing at an optimum time for them, for example in the early stages of dementia, during recovery from an episode of depression or when coming out of hospital after an illness.

Process Housing Providers are to notify of vacancies within their schemes via the brokerage portal within 5 days of the property becoming available. (Day 1 of the process). The NHS Trust will send the matched Extra Care Housing application over to the Housing Provider via the portal, which will be considered, to be a formal nomination. (Target to achieve this within a further 5 working days). The Housing Provider is to make contact with the individual, invite them to view the property and carry out further checks prior to making an offer (Target to achieve this within 10 further working days). The Housing Provider is to notify the Relevant NHS Trust via the brokerage portal of the outcome of the viewing, which will be confirmation of tenancy being offered or offer declined with refusal reasons provided. Target to achieve this no more than 15 working days after initial nomination).

If a tenancy is offered the Extra Care Co-ordinator or CWP Trust for specialist Extra Care is to update the care management system by closing the Extra Care application and completing a support plan to record the Extra Care provision. If the offer of a tenancy is declined, then the relevant NHS Trust is to update the application form with the reasons for refusal and the individual is to remain on the waiting list.

13. ROLES AND RESPONSIBILITIES

Social work teams or deleted social work providers will:

- Co-ordinating/managing the Extra care process within the care management system.
- Completion of the assessment and review of eligibility for extra care accommodation and level of care need.
- Completion of the Extra Care Housing Application
- Matching vacancies to people on the waiting list
- Responding to any appeals made by applicants about the assessment, waiting list or allocation.
- Confirmation letters being sent to successful applicants.
- Sending Letters with advice to unsuccessful applicants.
- Ensuring the care management system is updated with correct service provision for Extra Care.
- Where information is shared with an external organisation, ensure there is a data sharing agreement in place which meets with GDPR.
- The costs of Extra Care and ensuring the care provider has the relevant information on tenant's care needs. The Housing Provider is responsible for.
- Communicating with relevant care provider on level of care capacity when informing of a vacancy. Role Panel Senior Manager from NHS Trust LD & General Appropriate Housing Provider (maximum of one representative per organisation) General Care Provider LD & General Commissioning / Contracts Lead LD & General 12
- Notifying the NHS Trust of the vacancy within the agreed timeframe via the brokerage portal.
- Confirming the outcome of the nomination via the portal.
- Completing all housing related documentation. The tenancy agreement must include a relevant clause that secures agreement to making a full financial contribution to the core care support which is provided on site 24 hours per day 7 days a week.

- Investigate and where appropriate and resolve or make recommendations regarding any lettings/ void issues.

14. DEPENDENCY LEVELS

Social work teams or delegated social work providers will endeavour to maintain a balanced community within any Extra Care scheme which reflects the needs and aspirations of all its members. It will therefore consider the needs of each applicant alongside the needs of existing tenants before deciding if the needs of the applicant can be met within the scheme.

15. MAXIMUM DEPENDENCY

As a general rule, Extra Care housing applicants whose needs exceed those which can be met in the extra care scheme will not usually be eligible (See Point 4). On the basis of medical and/or other professional opinion, at the time of entering the scheme or shortly after entering, an applicant will not usually have:

- A level of physical or mental frailty exceeding that which can reasonably be met within the community.
- A level of physical or mental frailty which is likely to cause serious disruption or risk to other residents. This might include people whose behaviours adversely affects the rights of other residents to have “quiet enjoyment” of their home.
- Behaviour which is severely challenging, or which presents risks to others in terms of violence or aggression that cannot reasonably be managed.
- A need for frequent/consistent nursing care throughout the 24-hour period, beyond the level available from the Community Nursing Service

However, it is recognised that residents’ care needs will change over time and that they may need flexibility in the provision of care and support services. In the event of a tenant’s needs changing or increasing, a new assessment will be carried out and a new care plan, which takes account of risk, will be compiled to reflect ways of meeting their needs in the scheme, in order to manage any risk, provide maximum independence, autonomy, dignity and choice for the individual and other residents. Extra Care housing cannot guarantee a home for life and if the resident’s medical condition or behaviour means that their needs cannot be adequately met in extra care accommodation, then all agencies would work to find suitable alternative accommodation and care for the resident.

16. REFUSALS

All applicants for Extra Care must meet the criteria for access to Care & Support 24 hours per day. In principle, the application form will note applicants’ preferences for a particular scheme, the type of property and, if appropriate, the floor and location of their property. However, allocations will be made on the basis of need and availability across all schemes. Housing Providers have developed publicity material which enables applicants to see what facilities a particular scheme has to offer.

Housing Providers also encourages applicants to visit the schemes of their choice to enable them to check that the scheme meets their aspirations. There is an expectation therefore, that applicants will only apply for those schemes they are genuinely interested in. Applicants who refuse offers of accommodation for reasons not related to their housing, support and care need may lose their position on the waiting list.

All refusals will be considered by the relevant NHS Trust on an individual basis. Unreasonable Grounds for Refusal: Unreasonable refusals are those where the offer meets the applicant's requirements as detailed in their application and their circumstances have not changed.

Reasonable Grounds for Refusal: Reasonable refusals are those where although the offer meets the applicant's requirements as detailed in the application form, the applicant's circumstances have changed. This may include the following:

- Applicant is in hospital or awaiting hospital treatment.
- Applicant has recently suffered bereavement.
- Change to applicant's current health and care needs.
- Other reasons which will be considered on a case-by-case basis. First Refusal: All applicants who refuse an offer will be asked to explain the reason and this will be noted on their application. Second Refusal:

The applicant will be asked to give their reason. If the second refusal is considered to be unreasonable, the matter will be considered by the relevant NHS Trust. The relevant NHS Trust will confirm whether the refusal is unreasonable and whether the applicant remains on the waiting list. This approach will ensure an objective and consistent approach. If they are found to have refused two reasonable offers, they no longer stay on the waiting list. This approach will also apply to applicants granted transfer status. Applicants will be advised in writing of any decision.

17. SUSPENSIONS AND EXCLUSIONS

The following circumstances may result in individuals being suspended from receiving an offer.

- If due to mental or physical incapacity a vacant property is not suitable for an applicant's needs and cannot be made so within a reasonable timescale, an offer will not be made to that applicant.
- Where an applicant has unreasonably refused offers of accommodation (See Point 11, Refusal). There may be exceptional circumstances where it is appropriate to exclude an applicant altogether. Reasons for exclusion might include:
- Someone with a history of anti-social behaviour, serious rent arrears, neighbour nuisance, or threatening behaviour where they are considered unsuitable to be a tenant.
- Where it is apparent that applicants are not intending to use the accommodation as their only or main home.
- Where the applicant may have a detrimental effect on the harmony of the scheme or on the peaceful enjoyment of other residents on the scheme. 15 However, before a decision to exclude is taken, consideration must be given to the possibility that past "behaviour" may be as a result of a mental health or incapacity problem and/or an unmet care/support need or other extenuating circumstance. Panel members should consider if, following a full risk assessment, the provision of appropriate care and support would address any potential issues relating to an allocation to a particular applicant.

18. REVIEW OF DECISIONS

Applicants have the right to request a review of a decision as to how their application has been dealt with. Reviews are likely to centre around five main areas of the process which are:

- Issues connected with recording their interest in Extra Care housing. These will be dealt with by the Housing Provider according to their review procedure.
- Issues connected with the care needs assessment of their application for Extra Care Housing, or initial assessment of eligibility prior to consideration at the extra care. These will be dealt with by the Relevant NHS Trust through their review procedure.
- Issues connected with the way a health needs assessment has been carried out. These will be dealt with by the NHS Trust using their Complaints Procedure.
- Issues connected with decisions made by the NHS Trust with regard to Allocations e.g., prioritisation on the Waiting List will be dealt with by the NHS Trust.
- Issues connected with the lettings process for a particular property following nomination by the NHS Trust. These will be dealt with by the Housing Provider.

19. EQUAL OPPORTUNITIES

The Council is committed to providing housing services to the whole community and will not discriminate against any applicant on the basis of any protected characteristic under the Equality Act 2010.

20. DATA PROTECTION

All parties who have access to data must ensure that the general data protection regulation (GDPR) is adhered to. And agreement in place where required.