



## Policy on Independent Living and Care Needs in Almshouse Accommodation

(To be read alongside the Safeguarding Policy)

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### 1. Purpose

This policy sets out the position of Thorner's Homes CIO regarding the eligibility and suitability of residents living in almshouse accommodation, particularly in relation to care needs, compliance with the Care Act 2014, and the responsibilities of Southampton City Council and NHS discharge teams.

### 2. Scope

This policy applies to all almshouse residents, applicants, and associated health and social care professionals, including Southampton City Council Adult Social Care and the NHS hospital discharge team.

**This policy is to be read alongside the Thorner's Homes Safeguarding Policy for Almshouse Residents, which outlines the categories of risk, staff responsibilities, and procedures for responding to safeguarding concerns.**

### 3. Principles of Almshouse Residency

- Almshouses are designed for individuals who can live independently.
- Residents may have low-level support needs, but they must be able to manage daily life either independently or with a reasonable care package.
- Almshouses are not registered care homes and do not provide personal care services.

### 4. Disqualifying Criteria for Residency

- Being bedbound or unable to mobilise independently or with routine community support
- Requiring 24-hour personal or nursing care, including assistance with toileting, feeding, or repositioning
- Suffering from acute or advanced dementia resulting in significant confusion, wandering, or behavioural risks
- Requiring use of hoisting equipment or two-person transfers, unless care is reliably provided by external professionals

### 5. Support That May Be Compatible

- They receive domiciliary care from external providers for tasks such as washing or medication
- They use telecare/pendant alarm systems for reassurance or occasional assistance
- They have family support supplementing their independence



## **6. Care Act 2014 Compliance**

Under the Care Act 2014, local authorities such as Southampton City Council have a legal duty to:

- Assess the needs of individuals with potential care and support needs
- Ensure safe and suitable discharge and placement planning, including working with NHS discharge teams
- Commission care that is appropriate to the individual's assessed needs

Placing an individual in an almshouse who is not capable of living independently constitutes a failure to meet eligible care needs and may be considered an unsafe or inappropriate placement.

## **7. Staff Responsibilities and Boundaries**

Staff at Thorner's Homes are not trained or employed to deliver personal care. Asking or expecting staff to intervene in situations requiring professional care breaches:

- Health and safety guidelines
- Professional boundaries
- Duty of care to all other residents

Staff may be available on call for genuine emergencies, but this must not be interpreted as a substitute for:

- Family or care support attending to wait for ambulance services
- Professional responders managing medical or mobility emergencies

If a resident is at known risk of falls, they must be enrolled in the Southampton City Council Responder Service, which is equipped to attend promptly and assist in non-medical fall recovery. This is not an optional service - in the current context where ambulance waits can exceed five hours, having a responder service in place is essential to ensure safety and dignity.

## **8. Impact on Staff and Other Residents**

Putting pressure on almshouse staff to provide care beyond their role not only places them in an unsafe and professionally inappropriate position, but it also diverts time and attention from other essential duties. This can lead to neglect of other residents' needs, delayed responses to genuine emergencies, and overall deterioration of the safe, community-based environment we strive to maintain. Such situations create inequality, increased risk, and a loss of dignity for both the resident requiring excessive support and others who expect fair and safe housing conditions.

## **9. Escalation, Safeguarding, and Environmental Risk**

If a resident is identified as being unsafely housed due to care needs:

- A referral will be made to Southampton City Council Adult Social Care for immediate reassessment



- Emergency services may be contacted if the risk is immediate (e.g. failed hospital discharge)
  - Where concerns relate to neglect, cognitive decline, financial abuse, or refusal of care, a safeguarding referral may be appropriate. All staff are encouraged to raise such concerns with the Designated Safeguarding Lead (DSL).
  - A multi-agency review may be initiated to safeguard the individual and the wider community.
- Additionally, housing individuals with high dependency needs poses a significant fire and evacuation risk, especially if they are bedbound or cannot self-evacuate. This risk must be considered during discharge planning. A PEEP (Personal Emergency Evacuation Plan) must be in place for any resident unable to evacuate unaided, and residents whose conditions make this impossible should not be discharged into unsupported independent living settings.

## 10. Policy Review

This policy will be reviewed annually or in response to significant changes in legislation, guidance, or practice.

Approved by: Trustees of Thorner's Homes CIO

Date: September 2025

Consultation Period: 26<sup>th</sup> March to 20<sup>th</sup> April 2026

Next Review Due: Following closure of consultation



## **Appendix A: How 'Setting Aside' a Placement May Conflict with the Care Act 2014**

Refusing or reversing a placement decision without formal referral or reassessment may conflict with statutory duties under the Care Act 2014, including:

- Section 18: Duty to meet eligible needs
- Section 2: Duty to prevent or delay escalation of needs
- Section 42: Safeguarding adults at risk

If an almshouse refuses a placement without referring the case back to Adult Social Care or involving NHS discharge planning, this may:

- Interrupt lawful care pathways
- Delay access to appropriate support
- Expose the resident to avoidable harm

Therefore, all decisions to set aside or refuse a placement must be supported by clear documentation, formal referral, and, where necessary, multi-agency review.



## Appendix B: Decision-Making Flowchart

Unsuitable Placement or Set-Aside Process



Is the resident suitable under almshouse policy?



NO



Document the risks:

- Physical care needs (e.g., bedbound)
- Cognitive risks (e.g., advanced dementia)
- Fire evacuation concern (PEEP impossible)



Notify relevant parties:

- NHS Discharge Team
- Southampton City Council Adult Social Care



Make formal referral:

- Request reassessment or alternative placement
- Flag safeguarding or failed discharge if urgent



Propose Multi-Agency Risk Management (MARM) meeting



Retain all documentation and rationale



## Appendix C: Template Letter - Referral for Unsuitable Placement

To:

Southampton City Council – Adult Social Care  
[NHS Discharge Team Contact]

From:

[Your Name], [Your Role]

Thorner's Homes CIO

Date: [Insert Date]

### **Subject: Referral - Unsuitable Discharge to Almshouse Accommodation**

Dear [Adult Social Care / Discharge Coordinator],

I am writing in regard to the proposed discharge of [Resident Name] to Thorner's Homes CIO almshouse accommodation.

Following assessment against our Policy on Independent Living and Care Needs, we regret to advise that this setting is not suitable for the individual's current level of care need, for the following reasons:

- Requires 24-hour supervision or personal care
- Is unable to mobilise independently or with only minimal support
- Presents with cognitive or behavioural risks incompatible with independent living
- Fire safety risk: Unable to self-evacuate and no PEEP is feasible

Thorner's Homes is not a registered care home and does not employ staff qualified to deliver personal or clinical care. Housing an individual with needs exceeding our remit would pose significant risk and may contravene legal responsibilities under:

- Care Act 2014 – Duties around meeting eligible needs and safeguarding
- Regulatory Reform (Fire Safety) Order 2005 – Fire evacuation requirements
- Discharge to Assess protocols – Obligations to ensure safe discharge

We are therefore referring this case back to Adult Social Care and the Discharge Team for urgent reassessment, and request initiation of a Multi-Agency Risk Management (MARM) meeting to determine appropriate next steps.

Please confirm receipt of this referral and advise on planned action.

Yours sincerely,

**Mrs Vicky Joynes BSc (Hons) MRICS**  
**Thorner's Homes CIO**

E: [Vicky.joynes@thorners.org.uk](mailto:Vicky.joynes@thorners.org.uk)  
O: 023 8063 6772 Option 5



## Appendix D: Impact of Undue Pressure on Staff and Other Residents

Putting pressure on almshouse staff to provide care beyond their designated role has serious consequences:

- It places staff in unsafe and professionally inappropriate situations.
- It diverts attention from essential duties, delaying responses to genuine emergencies.
- It creates inequality, where one resident's excessive needs reduce the quality of support available to others.
- It undermines the community-based model of independent living.
- It may lead to stress, burnout, or safeguarding concerns among staff.

These effects can compromise the overall safety, dignity, and fairness that Thorner's Homes strives to provide to all residents. Expectations of personal care must always be directed to external providers or family support, not housing staff.



## **Appendix E: Key Terms from the Letter of Appointment and Policy Alignment**

### **Independent Living Requirement**

Key Quote:

“Residents may expect to continue in occupation for as long as they... are able to look after themselves... The Charity may set aside the appointment if the resident is no longer able to live independently.”

Policy Alignment:

This supports Section 4 (Criteria for Residency) and Section 6 (Care Act Compliance), affirming that continued eligibility depends on the ability to live independently.

### **No Legal Tenancy / No Right to Remain Without Meeting Conditions**

Key Quote:

“Neither the resident, nor any relation or guest... will be a tenant... All accommodation is provided on a sole occupancy basis.”

Policy Alignment:

Supports Section 8 by reinforcing that occupancy is conditional, and no placement grants tenancy rights.

### **Staff Access and Oversight**

Key Quote:

“Residents must allow regular access... for health and safety checks, maintenance, repairs, and visits.”

Policy Alignment:

Reinforces Section 7 (Staff Responsibilities) by establishing staff oversight as standard and necessary for safe operation.

### **PEEPs and Pendant Alarm Conditions**

Key Quote:

“You may be required... to wear a pendant alarm and subscribe to Southampton’s Responder Service.”

Policy Alignment:

Confirms Section 7 and 8 obligations on falls safety and non-optional telecare responding service for residents without reliable local support.

### **Zero Tolerance Clause**

Key Quote:

“Unrealistic demands... or abusive behaviour toward staff... will result in warning or formal notification to leave.”



Policy Alignment:

Aligns directly with Section 7 and Appendix D by protecting staff boundaries and supporting safe community conduct.

**Set-Aside Clause**

Key Quote:

“The Charity retains the right to set aside a resident’s appointment... including if they are no longer able to live independently.”

Policy Alignment:

Reinforces the process outlined in Section 8, supporting lawful and safe withdrawal of accommodation if eligibility is no longer met.