

Executive Report

Future of Douglas Bader Care Service for People with Physical Disabilities

Date: 7th January 2014

Lead Director: Tracie Rees

Useful information

- Ward(s) affected: City-wide
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1. Decision Summary

- 1.1 In August 2013 the Executive gave approval to consult on the future of Douglas Bader day care centre. The service provides day care support for working age adults (18 to 64) with a physical disability.
- 1.2 The statutory consultation ran from 17th September 2013 to 16th December 2013 on the proposed closure of Douglas Bader day care centre. Information relating to the consultation process and key findings are detailed in this report
- 1.3 Over the last two years the numbers of people attending the service has reduced and only 3 new people have entered the service since 2011. The decline can be attributed to young disabled people choosing to use their personal budget to access alternative services or community based options.
- 1.4 There are currently 48 people registered to use the service, although on average only 22 people attend the centre at any one time. There has been a 42% reduction in numbers attending since April 2011. The lower numbers the higher the unit costs for the service.
- 1.5 Service users involved in the consultation were anxious about the change, but recognise change is necessary and were keen to explore alternative options available with appropriate support.

2. Recommendation

- 2.1 The Executive is recommended:
 - a) To approve the closure of Douglas Bader day care centre as detailed in Option 2.

3.0 Why it is needed:

- 3.1 Douglas Bader day care centre provides a service for people with a physical disability where the Authority has a statutory duty to provide care and support.
- 3.2 Douglas Bader day care centre opened over 40 years ago at a time when there were very few opportunities for people with a physical disability. However, with the introduction of the Disability Discrimination Act and the changing attitude of society, people with a physical disability are now able to access community based services and employment opportunities.
- 3.3 Also, with the introduction of personal budgets and direct payments people eligible for Adult Social Care (ASC) support are able to buy alternative services

and very few young disabled people are choosing to use traditional services day care services.

- 3.4 Feedback from the 'Big Mouth' forum for young disabled people shows they want to attend mainstream activities and that they have aspirations to be independent, gain employment and to be part of their community – see Appendix 1. The 'Big Mouth' forum is the consultative group for Children's services.
- 3.5 A report was commissioned by the Council in 2012 from the Leicester Centre for Integrated Living (LCIL) to look at the needs of young people going through the transitions process. The report outlined the aspirations of young people and the desire to access employment, to live independently and to be part of their community. See appendix 2 for a copy of the transition report and a statement of the aspirations of disabled people from LCIL, which is a user led organisation, run by disabled people for disabled people.
- 3.6 Although, Douglas Bader day care service is for working age adults between 18 and 64 with a physical disability. Due to the lack of new people attending the centre, people over 65 years have been allowed to stay, which makes it difficult to provide stimulating activities for a small number of attendees spanning a wide age range.
- 3.7 With the decline in numbers attending Douglas Bader day care centre the cost is increasing. As people are allocated a personal budget, the amount they receive needs to cover the cost of the services they access. The cost of attending Douglas Bader day care centre is £72 per person, per day. This is compared to an average of £30 per day, per person if they choose to attend a voluntary and community Sector day care service.
- 3.8 In addition, the cost of the daily meal at Douglas Bader day care centre is £18 per day, per person. The cost to the service users is £3 per day and the Council subsidises the difference.

Consultation Process

- 3.9 **Service user/family carer consultation**
The consultation proposal was to cease the provision of service for working age adults with a physical disability attending Douglas Bader day care centre. Letters, information booklet and details of consultation meetings were provided to service users and carers/families.
- 3.10 Group and individual one-to-one meetings were offered to all service users and their carers/families. Questionnaires were made available to all service users/carers and 35 were completed and returned.
- 3.11 The Council also secured the support of Leicestershire Centre for Integrated Living, Mosaic's Advocacy Service and CLASP The Carers Centre to ensure that the interests of service users and their families were properly reflected in the consultation process.
- 3.12 At the request of services users, the City Mayor attended a special meeting with

service users at the centre to listen to their concerns and to answer some of their questions. The City Mayor heard that at one time there were over 100 people attending the centre, whereas the average per day now is 22 people.

- 3.13 If the Executive accept the proposal to close this service, a programme of support will be put in place for service users and staff to support them through this period of change. This includes dedicated staff to carry out reassessments, brokerage to support planning and identify where and how identified needs will be met, advocacy support for service users and families, and HR support for staff.

Headline Findings

- 3.14 Service users and families listened to the rationale for change explained throughout the consultation, but in the main the overriding message is that service users and families are anxious about change, but they were keen to explore what other services could meet their needs.

- 3.15 Services users recognised that the change is necessary and the reasons they wanted to keep the centre open were due to:

- Anxiety about change and fear of the unknown
- Fear of becoming isolated at home and losing contact with their friends
- Worried the number of days they are able to access day opportunities would reduce

- 3.16 During the one to one consultations with individuals and their families, it was apparent that individuals and their families were already starting to actively explore alternative options. Many individuals who attend the centre requested one to one meetings to explore their options ahead of the outcome of the consultation exercise. In some cases they expressed a desire to move to a particular external service.

Officer response: Service users were shown a DVD of the Community Options pilot to enable them to understand the different ways they could still maintain their friendships groups and pursue their interests. Many expressed a sadness that these opportunities were not available to them when they were younger, which had resulted in them becoming institutionalised and dependant on Douglas Bader day care centre as the only option available to them.

At the moment the number of days people attend the centre ranges from half a day per week to 5 days per week, with the majority attending 3 days or less.

Regardless of if the centre closes or not, service users will have a reassessment of their needs as part of the statutory annual review process. The assessment will determine the individual's current needs and may result in a change in the service package they currently receive. The outcome of the assessment will be used to generate a personal budget and a support plan will be developed to ensure their needs are met in the most appropriate way.

- 3.17 Families expressed fears about external providers and in particular:

- standards of care and quality
- the availability of service to meet people's needs
- that they would be left to find alternatives for their loved ones
- the quality of staff, quality of service and training

Officer response: The Council has contracts with 19 voluntary and community day care providers, who are able to cater for a range of vulnerable adults with different needs. As part of the monitoring of these contracts the Council is continually checking the quality and outcomes of these services.

3.18 Although, carers and families were anxious about change, they understood the reasons, but wanted assurance that there were alternative services available.

Officer response: To give families/carers an idea of the type of provision that is available, an event was organised for providers to showcase their services and for them to talk to people about the services they provide. The event took place on 31st October 2013 and as a result some individuals arranged to visit the providers at their premises to sample what was on offer and subsequently a small number of individuals have already chosen to stop attending Douglas Bader day care centre and are in the process of transferring to new services.

3.19 Almost everybody involved in the consultation expressed dismay at the length of time it takes for the Council to make a decision. People were keen to know the decision as soon as possible in order that they could start planning for the future. Waiting for formal processes, although unavoidable, to see their course has an impact on people's well-being and on staff morale.

Officer response: The Council is required to consult on key decisions, such as the closure of day care services and the formal consultation process can take up to 12 weeks. Also, the Adult Social Care Scrutiny Commission should have the opportunity to scrutinise proposed changes and to make recommendations to the Executive to ensure the best outcome.

3.20 Two emails were received from carers giving their views on the proposal. one letter was received from a service user and one letter from MP Liz Kendall on behalf of a carer.

3.21 Additionally the views of The Big Mouth Forum, a constituted group of young disabled people who are self-advocates were sought on the proposal. Each member expressed a strong aspiration to participate in ordinary community life, to have a paid job, a home and a social life. None of them felt a day centre would facilitate their aspirations and instead would continue to perpetuate the segregation of disabled people in society. See appendix 1.

3.22 The detailed consultation findings can be found at Appendix 3 and the Executive Summary can be found at Appendix 4.

Other Implications

3.23 A detailed discussion of the financial, legal, equalities and workforce implications of the proposals can be found in section 5 of the report. The

Equalities Impact Assessment is detailed at Appendix 5 and describes how the Council might mitigate against negative customer impacts.

Other suggestions made by those consulted

The following suggestions were put forward for consideration by the Executive by individuals and families who responded to the consultation:

3.24 Expand the current services offered by actively marketing and attracting people in to the service.

Officer response: The Putting People First concordat (2007) requires all local authorities to give people choice and control over the services they receive. People eligible for ASC support are given a personal budget and are able to take a direct payment and buy their services directly from a range of providers. This is evidenced in the reduction of young people attending the Douglas Bader day care service. Evidence shows that young people with a physical disability are not choosing traditional day care services and are opting for community based services and seeking employment opportunities – see appendix 2.

3.25 Consideration should be given to allowing other organisations and groups to use the building, including at evenings and weekends for functions, parties and other activities.

Officer response: This is something that could be explored if the day care service closes. However, it was explored in the past, but was not welcomed by neighbours, due to concerns about parking and noise levels, as the centre is located in a residential estate. Also the building requires substantial renovation, which is estimated at £1.7 million.

Also Culture and Neighbourhood Services are reviewing their portfolio and downsizing their staffing establishment to achieve budget efficiencies and therefore they would not be looking to take over the management of this facility.

3.26 If the centre closes, rename the street after Sir Douglas Bader in order to commemorate the war hero.

Officer response: This is something that would be considered once the future of the centre is known.

3.27 An external provider or group of providers, taking over the management of the current service and maintaining the status quo.

Officer response: No organisation has come forward seeking to take over the service. However, TUPE is likely to apply with the employment of the current staff transferring to the new provider/ providers, under their current terms and conditions, including pay, holiday entitlement and redundancy as per the Regulations. Therefore, it is unlikely that any new provider would want to take over the service with decreasing numbers and increasing costs. Also the building requires substantial renovation, which is estimated at £1.7 million.

Outcome of Collective Consultation

Staff, supported by the Trade Unions, voiced many of the same issues as service users and carers, but in addition the following points were raised:

3.28 Staff and the unions believed that referrals into the centre had been actively stopped following a budget paper in 2011. Service users would be happy to stay, if the threat of closing was lifted, it could be more popular.

Officer response – Up to the point of this consultation exercise there has been no instruction to stop referrals into the centre. No evidence has been provided to support this claim.

3.29 Is there a possibility that there is another venue with basic facilities for emergency day respite? A base for friendship groups to continue? Also some people would be at risk with new key workers?

Officer response: The roll out of Community Inclusion Team has been agreed and staff have been recruited to support service users and families. Part of the remit for this team will be to identify appropriate spaces for friendship groups to meet and provide carers with information, advice and practical support where appropriate including emergency day respite. Individuals will also still have the opportunity to access voluntary sector day services, either through a council commissioned service or via a direct payment, if this meets their assessed needs. In addition the installation of Changing Places facilities and the capital investment to improve disabled access means people from Douglas Bader day centre will have access to modern venues where they will be supported to be able to continue to maintain their friendship groups.

3.30 Would there be the possibility of transferring to Hasting Road day care centre if redundancies are made at Douglas Bader day care centre?

Officer response: If a decision is made to close Douglas Bader day care centre staff will be offered the opportunity to gain alternative employment in the Council via redeployment opportunities.

3.31 There are people who need personal care whilst out and about. It's difficult to assist with personal care in outside toilets. My proposal is to keep this service for people with high level needs.

Officer response: The Council has identified capital monies to develop toilet changing facilities for adults.

3.32 What will happen if public consultation recommends the service is kept in some form?

Officer response: This will form part of the work of the Community Inclusion Team who will still provide support to individuals, but in a different setting.

Unison's response to the proposal (Appendix 6)

3.33 The issue of consultation, its meaning and purpose is again of cause for concern. During management's consultation with the trades unions UNISON posed the question "In consulting the public on the closure of Douglas Bader is it the case

that if public opinion were against closure it would not happen?" No real answer was forthcoming however given Leicester City Councils track record to date UNISON suspect not.

Officer response: A decision is reached based on all the facts; one opinion does not carry more weight than any other. The facts are that the numbers of people attending the centre are falling and the costs continue to rise. However, the process of consultation has enabled the engagement and views of a wide range of people including users, carers, staff and the general public. If, during the exercise, viable alternatives are presented these are given full consideration and could result in different action being taken than that originally proposed.

3.34 In respect of the consultation with staff and the trades unions – it is debatable to what extent they are able to influence the decision making – to propose an alternative which might be accepted? If consultation can change nothing surely it is meaningless and futile and therefore very difficult to engage in with any faith.

Officer response: Over recent months there have been consultation on the future of Housing Related Support and Mobile Meals, both exercises have enabled individuals to express their views, and in each case the Council has changed the recommendation as a direct result of feedback from the consultation. For many people at Douglas Bader day care centre, they have never been given an opportunity to say what they want. However, the consultation has given them a chance to voice their requirements and as a result many individuals have requested one to one meetings to explore their options and in some cases had already expressed a desire to move to a different service.

3.35 In respect of the current proposal to close Douglas Bader day care centre the rationale offered for the closure is as always falling numbers of people attending the service – thus increasing the cost to the Council.

Officer response: Since the start of the consultation the numbers registered to attend have fallen to 45 people, but the staff numbers remain the same, therefore the unit cost per person has risen. As each person pays for the service out of their personal budget, if the unit cost per day increases then they are likely to choose other services that are cheaper.

3.36 Whilst the Personalisation agenda may have played some part in the decreasing number of service users it is clear that LCC itself had a hand in the decline. A lack of referrals is a major contributory factor for falling numbers. UNISON believe this was a planned strategy - details of which can be found in the same budget papers which set out an identical approach in respect of the EPHs i.e. 2011 budget and recommendations. Reference is made to within this document to 'effective management of referrals in the interim period to prevent further placements' No doubt this is what happened.

Officer response: The report being referred to was never approved or enacted and there has never been a policy to stop people being referred to Douglas Bader day care centre.

3.37 The flexibility of non-council services and the use of Personal Assistants (working evenings and weekends) are cited as advantages of closing the

service. It appears no-one has considered whether the current staff would be willing to be equally flexible.

Officer response: The work of the Community Inclusion Team is designed to facilitate individuals to access local community based services, including weekends and evenings. Unless staff terms and conditions were changed, the cost of working unsociable hours would increase the overall unit cost further. Currently, individuals can engage a Personal Assistant costing approximately £10 per hour, whilst it would cost £16 per hour to use a Council employee.

3.38 When UNISON met with the staff group they were concerned that their service was not understood, that it was seen as entirely building based and somehow old fashioned. They wanted people to know this is not the case. They are much more than a traditional day centre and have forged links with the community, which they support service users to access.

Officer response – The work of the Community Inclusion Teams is designed to build on the links already made with the community and to facilitate individuals to access mainstream services.

3.39 They are disappointed that other options are not being considered; for example the re-provisioning of the service such that it is either less building based or based in buildings already being utilised by the community. Staff were willing to work flexibly in the evenings and at weekends to provide services to the current client group.

Officer response: Unless staff terms and conditions were changed, the cost of working unsociable hours would increase the overall unit cost further. Currently individuals can engage a Personal Assistant directly costing approximately £10 per hour, whilst it would cost £16 per hour to use a Council employee. Also staff have been given the opportunity to apply for posts within the Community Inclusion Team.

3.40 Whilst reference has been made to the work of the Community Inclusion Team it needs to be noted that this is short term (12 weeks) and much is expected of this very small team. Not only are they required to help people access services in the community it appears they are also charged with developing services (presumably in recognition that there isn't currently sufficient provision). Whether the team has the capacity to undertake all of this work effectively remains to be seen.

Officer response: As the roll out of the Community Inclusion service gains momentum the size of the team will be reviewed and increased as necessary.

3.41 One of the concerns the staff at Douglas Bader day care centre raised with UNISON is that not all of their client group will benefit from the work of the Community Inclusion Team; some service users are more highly dependent and their needs more complex. It is this group who they believe require a different service; one which is currently not provided in the community – a service which they believe they could provide.

Officer response: There are contracts in place with 19 voluntary and community sector organisations, with many being able to support people with complex needs, if

they wish to attend traditional day care services.

3.42 It is important to consider the fact that at this moment in time this political administration is presiding over the biggest decimation of social care services this city has ever seen. The closure of Elderly Persons Homes, the closure of Older Persons Mental Health Day services, the closure of the mobile meals service and the closure of Douglas Bader day care centre. We expect a proposal to reduce the provision of day services to adults with a learning disability in the not too distant future. UNISON would assert it really doesn't have to be this way. As the largest public sector trade union we believe that the provision of public services should lie with the public sector – thus ensuring their accountability. The Executive cannot continue to lay the blame for decisions which devastate the lives of service users and their relatives at the door of the coalition – it either has to own its priorities or change them.

Officer response: This is the view of Unison and is noted.

3.43 The report received by the Adult Social Care Scrutiny Commission on 10th October 2013 stated (at Para. 3.7) that cost was not the main driver - if this really is the case then it is to be hoped that the Executive will seriously consider the suggestions offered by staff and not proceed with the closure of Douglas Bader day care centre.

Officer response: As individuals are choosing not to attend Douglas Bader day care centre, the unit costs are increasing, therefore the financial consequence cannot be ignored when the Council is facing unprecedented budget cuts.

Support for the changes

3.44 The following individuals/organisations have expressed support for the changes.

- Chair of Douglas Bader Client Committee
- Big Mouth forum
- Leicestershire Centre for Integrated Living
- Carers Action Group
- National Valuing Families Forum

4.0. Options:

4.1 Option 1. Continue with the existing service at Douglas Bader day care centre.

Advantages

- No change for staff or people attending existing service.

Disadvantages

- The service is becoming increasingly unsustainable as people are choosing alternative services and the unit cost is increasing, making the service financially unviable.

- Meeting changing expectations of individuals and achieving better outcomes will be lost.
- The opportunity to access the Community Inclusion Team will result in double running costs as some people will choose to access those opportunities, whilst others will choose to remain at Douglas Bader as long as the service remains an option to them.

Option 2. Close the service and support services users to source alternative provision. This would ensure the provision of suitable stimulating services for individuals and deliver a cost effective solution.

Advantages

- The majority of individuals using the Council's day care service would benefit from support to maximise their skills and achieve their potential in life and to access mainstream community activities and services and the Community Inclusion Team provides that support
- The Council will continue to support individuals to maintain their established friendship groups within community setting that meets their needs and promotes social inclusion.
- It will support the long term sustainability of the VCS and the council's own community facilities whilst delivering improved outcomes for individuals.
- Dedicated staff will support individuals, their families and carers through the transitional process.
- Individuals will be fully supported to make informed choices about the activities and services they would like to attend.
- Increased independence and opportunity, leading to better outcomes for individuals.
- Individuals will be able to purchase more activities and services with their personal budget, because community based activities tend to be less expensive.
- Non council services and the use of personal assistants (PA's) who maybe more culturally appropriate and can offer more flexibility e.g. working evenings and weekends, whereas the current day care service tends to operate from 9am to 3pm Monday to Friday.

Disadvantages

- Disruption to individuals using the service, although the impact will be minimised by working closely with individuals, their families and carers from the start to carefully plan any changes.
- As this proposal is likely to result in the closure of Douglas Bader day care centre this is likely to result in staff job losses.

5. Tell us how this issue has been externally scrutinised as well as internally?

5.1 ASC Leadership Team

5.2 Focus groups and one to one meetings with service users and families potentially affected by the outcome of the consultation on the proposal to close Douglas Bader Day Centre.

5.3 The following stakeholders were also informed of the consultation with the opportunity to provide their views and those of the people they represent:

- Elected Members and Local members of Parliament
- Trade Unions and staff at the day centres
- The general public via the council website
- The Carers Centre
- Leicestershire Centre for Integrated Living and Mosaic Shaping Disability Services
- Leicester City Clinical Commissioning Group
- Public Executive

6. Financial, legal and other implications

6.1 Financial implications

The average number of customers attending the day centre has fallen from 38 customers per day in April 2010 to 22 per day in November 2013. This represents a 42% reduction in the occupancy rate. In 2010/11 the unit cost of attending a day at Douglas Bader was £65 per person per day. This rose to £69 in 2011/12 and £72 in 2012/13. For the current financial year it is expected to be in the region of £94 per person per day compared to an average cost of £28.50 per person per day in the voluntary and independent sector.

The Council's Day Services are required to find budget savings of £906k. Expenditure for Douglas Bader day care centre for 2013/14 is expected to be around £493k. Initial scoping work of the cost of re-provision has indicated that savings of up to £300k may be possible through closure of the service. Further work is required to verify the nature and cost of replacement services that current customers would receive.

In addition to the savings on day services, there is likely to be a reduction in the need for transport services as a result of closure. It is possible that some savings could be achieved by amending routes and managing the spare resources that would arise, although re-configuration of the transport service may be required in order to deliver full transport savings.

There will be one-off costs associated with redundancies and a potential one-off capital receipt should a decision be taken to sell the property.

Stuart McAvoy Accountant (37 4004)

6.2 Legal implications

From a Community Care law perspective the relevant legislation to consider is the Chronically Sick and Disabled Persons Act 1970 section 2(1) and the National Assistance Act 1948 section 29 in respect of the Local Authorities duties to provide appropriate support for service users who by definition of their disabilities would be eligible for services subject to an assessment. By virtue of LAC (93) 10 2 (1) and the National Assistance Act section 29, social services authorities are directed to make welfare arrangements to include “to provide, whether at centres or elsewhere, facilities for social rehabilitation and adjustment to disability including assistance in overcoming limitations of mobility or communication; to provide, whether at centres or elsewhere, facilities for occupational, social, cultural and recreational activities, and where appropriate, the making of payments to persons for work undertaken by them”.

Where suitable alternative services are identified, as proposed in this report, and such services being considered to meet the needs of the individual service user(s) then the Local Authority will be considered to have discharged its duty to provide the appropriate services.

When considering alternative services the Council should have due regard to the public sector equality duties under section 149 of the Equality Act 2010.

Pretty Patel –Principal Solicitor, Social Care & Safeguarding (37 1457)

Employment Law Implications

Option 1

There are no immediate legal implications arising from option 1, however as service users continue to decline an organisational review and/ or redundancy situation may arise in any event. It is therefore recommended that Legal Services are consulted on a regular basis to ensure that the Council meets its legal obligations and minimise risk to the Council.

Option 2

The closure of the service falls within the statutory definition of redundancy. Legal Services are advised that consultation with the Council’s recognised Trade Unions and affected employees have already commenced in respect of this proposal. It is recommended that the Council continues to seek guidance from Legal Services to ensure that the Council meets its legal obligations and minimise risk to the Council.

The report contains very little information about how the service users are likely to be relocated to alternative provision. Depending upon the process followed there is a possibility that employees could follow the service users in accordance with the Transfer of Undertakings (Protection of Employment) Regulations 2006 (“TUPE”). It is advised that Legal Services are consulted upon the relocation process to be followed with the view that an analysis of such a risk may be undertaken. Further guidance will then be able to be given in this regard.

Hayley McDade (37 1431)

6.3 HR Implications

Only option 2 has staffing implications and this is likely to be redundancy as the Centre will close. These staff are in standalone posts.

Collective and Individual consultation has already taken place with Trade Unions and Staff and this will continue if the decision is made to close Douglas Bader.

In addition, if staff are displaced as a result of the exercise they will be eligible for the relevant notice period and redeployment under Leicester City Council existing procedures.

If notice of redundancy is issued to staff, support will be available to those affected through the Councils HR procedures including outplacement service, marketplace events and redeployment procedure.

An open dialogue with HR and Legal should be maintained in order to develop and monitor a suitable plan for HR processes.

Wendy Webster – HR Advisor (37 4344)

6.4 Equalities Implications

In summary, the protected characteristics of those affected by the proposal continue to be: age, disability, and for some current users, race/ethnicity. It is the prospect of change, fear of isolation and the standard of care by alternative providers that has generated the identification of most negative impacts.

Based on the consultation findings, the service has carried out further work to allay the fears of those consulted. The mitigating actions that have brought alternative providers and potential users and their families together appear to have dispelled some fears and provide a basis for reconsidering personal options available.

Underlying this proposal and the personalisation agenda is the issue of choice. At the heart of the proposal is the commitment to ensuring that the meeting of assessed individual needs will continue to be a central part of provision – irrespective of the actual form it takes or who the provider is. An individually negotiated balance between the two will ensure that we continue to meet our public sector equality duty.

Irene Kszyk - Corporate Equalities Lead (29 6303)

6.5 Climate Change and Carbon Reduction implications

The Douglas Bader Day Centre has the highest carbon footprint of the Day Care Centres in the city due to its size and age, and its closure could reduce the city council's carbon footprint by approximately 161 tonnes. However, only a proportion of these savings will only be realised as part of the building is still used by the Health & Safety Training Team.

7. Background information and other papers:

- a) A vision for Adult Social Care (2012) Leicester City Council

b) Putting People First Concordat (2007) Department of Health

c) Think Local Act Personal (2011)

8. Summary of appendices:

- Appendix 1 - Feedback from Big Mouth forum
- Appendix 2 – Transitions report/Statement from LCIL
- Appendix 3 – Consultation findings
- Appendix 4 – Consultation Executive Summary
- Appendix 5 – Equality Impact Assessment
- Appendix 6 - Trade Union response to consultation

9. Is this a confidential report (If so, please indicated the reasons and state why it is not in the public interest to be dealt with publicly)?

No

10. Is this a “key decision”?

Yes