worcestershire
countycouncil

Cabinet
Thursday, 12 July 2018, 10.00 am, County Hall, Worcester

Agenda

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Appendix 1

Response of the Cabinet Member with responsibility for families and children to the Scrutiny Report "Future Provision of Overnight Unit-Based Short Breaks for Children with Disabilities"

The Cabinet Member notes the report of the Task Group on the future provision of overnight unit-based short breaks for Children with Disabilities and thanks them for their work on this issue.

The consultation on the future provision of unit-based short breaks has been complex and challenging. I share the sadness of the Task group regarding any stress that the consultation and uncertainty have caused but we cannot arrest improvement of services for fear of change, and there must be openness about any proposals.

It is not my purpose to criticise the integrity of the scrutiny exercise but I feel the report would have been enhanced if the background had included the details of the early briefings provided for all councillors. This gave those who attended the opportunity to shape the engagement process. Some comparison of the level of provision in neighbouring and 'family group' areas would have also helped with context.

Furthermore, a table showing the number and general location of family members who provided evidence to the task group would have helped give the report greater validity. This might still be provided as a supplement to confirm that evidence taken came from credible sources and not exclusively from employees, organisations with a commercial interest or those on the periphery. This would have added weight to the *conclusion.*

Notwithstanding the above, I respect the experience of councillors of the task group which means that the *recommendations* must and will receive serious consideration.

Assessing the 'impact' of the proposals on all units during the consultation, and before recommendations were made, was an ambitious objective for the Task Group and the robustness of the report contents and recommendations can only reflect the views of parents and others that were engaged in the process.

I have considered the contents of the report carefully and respond below to the recommendations in the report.

Recommendation 1: The Task Group strongly urges the Cabinet Member to refer the final decision on the future provision of unit-based overnight provision to a public meeting of the Cabinet rather than making this very difficult decision by the delegated decision making process. This would allow greater transparency and public accountability and the public would have the opportunity for public participation.

The recommendation that Cabinet delegate the final decision on the future provision of unit-based overnight (short break) provision to the Cabinet Member with Responsibility for Children and Families, was agreed by Cabinet on 14 December 2017.

The process for a Cabinet Member decision includes the publication of report and recommendations and supporting information and data, in full, before the decision is made. In this case I have previously committed to the publication of the recommendations report and supporting documents well in advance of making a decision, with time for the information to be fully accessed by families and other stakeholders. However, in light of the recommendation

outlined above and emerging issues, I do not intend to exercise the delegation to make the final decision on the future provision of unit-based overnight provision and have requested that this matter be considered by Cabinet.

This is an important set of proposals to make a decision on and the information that has informed the report is complex. The consultation has also raised new considerations, so that the decision would benefit from being taken by Cabinet members collectively in a public meeting.

Recommendation 2: Before the County Council embarks on any consultation which may result in changes to services, there must be a pre-consultation engagement process, which would allow better planning and a clearer understanding of the needs of service users already accessing the services. This should be applied as standard across all County Council Consultations and the Task Group wishes to share this recommendation with the Cabinet Member with Responsibility for Transformation and Commissioning for consideration also.

I accept in principle that pre-consultation engagement may often be good practice and should generally be considered but it may be impractical for a number of reasons.

The comments on the need for the Council to adopt a consistent approach to consultations and to aspire to a 'gold standard' apply wider than this particular process and I am not sure that there can be a 'one size fits all' approach given the breadth of the Council's functions and stakeholders.

Recommendation 3:
The County Council must urgently review how it can improve its partnership working with the Worcestershire Health and Care NHS Trust (WHCT) and other service providers involved with the Service

It is accepted that there is always room for improvement in the relationship between the Council and its providers, whilst acknowledging the commercial nature of the relationship.

A significant amount of work is being undertaken by commissioners and social workers to strengthen relations with short break providers in general in order to improve choice for families and to ensure that services are delivered in a way which supports outcomes for children and young people while delivering meaningful respite for parents and carers.

The report to Cabinet (12 July 2018) of which this response forms part, contains specific recommendations in relation to the review of contract arrangements with Worcestershire Health and Care NHS Trust to provide clarity on the service provided.

Recommendation 4:
When undertaking a consultation on proposed changes to services, planning for the pre-engagement should commence at the time that the County Council first becomes aware that changes are likely, allowing adequate time for planning to avoid the Consultation being (or appearing to be) rushed.

In principle it is agreed that planning for pre-engagement and/or consultation should take place sufficiently in advance, with the caveat that preparatory work such as the gathering of information and data may be necessary before effective pre-consultation or consultation activity can be planned or commenced.

Recommendation 5:
There should be a consistent approach to engagement with service users to ensure that the impact on the wider service can be accounted for.

Whilst I agree that there should be an appropriate approach to engagement with service users, it is not the case that the engagement with various groups of service users, or even individuals within groups, should always be the same. In this consultation the potential impact on one group of service users (families accessing the unit in Ludlow Road) was likely to be significantly different to other service users (were the recommendation to be agreed) and therefore a different style of engagement was felt to be appropriate when the consultation activity was planned.

In all cases the approach to engagement should be appropriate and proportionate to the actual or perceived level of impact on service users.

Recommendation 6:
The Cabinet Member must ensure that Consultation proposals are supported by clear, concise, accurate and understandable relevant supporting information, which has been verified before the Consultation process commences.

I agree that Consultation proposals should be supported by clear, concise, accurate and understandable relevant information and anticipate that officers will ensure that this is the case. The purpose of a consultation is such that additional information will come to light during the process and must then be considered as part of the overall information available to the decision maker(s).

I will consider in full all of the information in the final recommendations report prior to any decisions being made.

Recommendation 7:
The outcome of this consultation should result in an overnight Short Breaks Service that is stable, resilient, sustainable and responsive and not under constant review.

I agree that the final recommendations following the consultation should ensure that ultimately the service is stable, resilient and responsive.

Without underestimating the disruption of change I am determined that any new arrangements are sustainable – for children of today and tomorrow.

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Appendix 2

Overnight unit-based short breaks consultation
Engagement timeline to 23 April 2018

The below activity has been carried out to engage with families and other stakeholders around the consultation of the overnight unit-based short breaks provision.

Date	Activity
07.12.17	Letter to families who use Ludlow Road advising them of upcoming Cabinet meeting item around the consultation
09-22.12.17	Telephone calls with parents who responded to letters
08.01.18	Consultation document, online survey and links to Cabinet paper/position statement uploaded to new information web page www.worcestershire.gov.uk/SENDupdates
09.01.18	Launch of consultation – Short Breaks update sent to SEND priority leads to cascade to teams, CWD team and YAT and colleagues within Health and Care Trust, Acute Trust and Acorns Children's Hospice.
10.01.18	Meeting with parent carer forum (Families in Partnership) to get input in regards to engaging with families
10.01.18	Meeting between commissioning team and social workers to share information about consultation and agree process for family meetings
10.01.18	Email to petition organisers - invite to a meeting
12.01.18	Letter to families who use Ludlow Road to confirm start of consultation and offer face to face meeting
15.01.18	Members briefing session
16.01.18	Easy Read version of consultation document uploaded on website
18.01 – 09.02.18	Face to face meetings with families who use Ludlow Road
19.01.18	Members briefing session
23.01.18	Follow up phone calls to families to ensure letters have been received and to offer meetings
23-30.01.18	Letters sent to users of other units advising of consultation
24.01.18	Additional 1:1 member briefing
25.01.18	Additional 1:1 member briefing
25.01.18	Frequently Asked Questions document uploaded to the website
25.01.18	Meeting with Providence Road managers to discuss proposal to increase bed capacity
26.01.18	Answers to specific family questions returned via email (2 families)
30.01.18	Letters sent to users of family-based overnight short breaks advising of consultation
01.02.18	Meeting with Health and Care Trust to discuss proposals for Ludlow Road and Osborne Court
02.02.18 & 08.02.18	Drop in session at Providence Road for families and social workers (letters/emails sent to advise of times)
09.02.18	Meeting with petition organisers
13.02.18 & 16.02.18	Drop in session at Osborne Court Road for families and social workers (letters/emails sent to advise of times)
20.02.18	Letters sent to users of all overnight units to advise of the end of the

	consultation period and next steps.
26.02.18	Letters sent to users of all overnight units to advise of meeting with Cllr Andy Roberts and the Health and Care Trust
08.03.18	Meeting with families, Cllr Andy Roberts and Debbie Herbert – The Artrix, Bromsgrove
09.03.18	Meeting with families and Health and Care Trust – Ludlow Road, Kidderminster. (HACT meeting with Debbie Herbert in attendance to answer any consultation questions)
21.03.18	8th March meeting notes sent to attendees and added on website along with update on timescales for report being published w/c 9th April
03.04.18	Letter sent to all units and added on website re not publishing on w/c 9th April
19.04.18	Meeting with Health and Care Trust – Debbie Herbert and Sarah Wilkins
23.04.18	Letter sent to all units re Scrutiny Task Group report and OSPB meeting

Appendix 3a

Provision of overnight unit-based short breaks for children with disabilities

Consultation survey results

A consultation was run from 8th January to 19th February 2018 on the provision of overnight unit-based short breaks for children with disabilities. A consultation survey was created and made available to complete online or via a paper version that could be emailed or posted.

Below is the information from this survey along with a summary of the comments made.

44 survey responses were received in total. 18 out of 44 left email addresses to be contacted about the consultation feedback.

What is your interest in overnight unit based short breaks? Please let us know whether you are a:-
Child/young person - 2
Parent/carer - 35
Professional - 5
Provider - 1
Councillor - 0
Other - 1 (Retired Social Worker)

Do you or your child currently access an overnight unit based short break in Worcestershire?
Yes - 24
No - 13
Blanks - 7

If yes, which unit do you access?
Ludlow Road – 3
Osborne Court – 9
Providence Road – 3
Moule Close - 7
Other – 2 (Russell House & Church View)

Where do you live?
Bromsgrove - 6
Malvern Hills - 2
Redditch - 5
Worcester City - 3
Wychavon - 1
Wyre Forest - 15

County-wide - 2
Outside of Worcestershire - 2
Blanks - 8

Where do you work?
Bromsgrove - 1
Malvern Hills - 0
Redditch - 0
Worcester City - 1
Wychavon - 0
Wyre Forest - 5
County-wide - 1
Outside of Worcestershire – 0
Blanks - 36

Please state whether you agree/disagree/neither agree nor disagree with proposal 1:

Review of the needs of all families currently accessing overnight unit-based provision to ensure that the needs of carers and children with disabilities are being met in the most appropriate way

Agree - 35
Disagree - 6
Neither agree nor disagree - 3

Of those that agreed with this proposal, the majority commented that reviews should be carried out regularly to ensure the needs of children, young people and families are being met appropriately. Some have these reviews already but commented that this might not be the same for everyone. Some commented that this review would help to identify where the needs are so services can be designed around this but most focused on having the review to improve services for families.

Of those that disagreed with this proposal, the majority commented that needs are already being met and/or are reviewed by social workers regularly anyway so this would be an unnecessary exercise.

Please state whether you agree/disagree/neither agree nor disagree with proposal 2:

Cease the delivery of overnight provision at Ludlow Road, Kidderminster at the end of the summer term 2018 and provide suitable and alternative provision for existing users. This proposal is based on the consideration of availability of other provision in the north of the county, the need to reduce the number of beds available to four, the potential costs of meeting Ofsted registration requirements and the potential to have more flexible and cost effective provision at Providence Road, which is also located in the north of the county.

Agree - 1
Disagree - 29
Neither agree nor disagree - 14

Of those that disagreed with this proposal, the key themes discussed in the comments were:

- Providence Road would be unable to meet the health needs of the children currently accessing Ludlow Road
- This would leave no health provision in the north of the County
- Transitioning children to alternative provision would have a negative impact on the child and their family
- Ludlow Road operates well and provides good support to the children and families who access it
- Travel distances to alternative provision would be too far
- Taking away provision at Ludlow Road would cause family breakdown and crisis resulting in more expensive provision in the future (e.g. social care)
- There are safeguarding risks to mixing children who access Providence Road with those who access Ludlow Road (mix of behaviour and health needs)
- The training, staff and equipment needed at other units would exceed the savings made by stopping provision at Ludlow Road
- There is already not enough provision, it should be increased rather than reduced
- This would impact on the families currently accessing the other units – e.g. take away flexibility of days or amount of days families can access

Of those that neither agreed nor disagreed with this proposal, the majority said it was because they weren't aware of the provision delivered at Ludlow Road or in the north of the County in general. One person said they agree with this proposal in principal if nursing staff would be available at Providence Road, however were concerned that Ludlow Road was always at full capacity so was unsure how reducing provision would help this. Questions were also asked around considering transport costs for families needed to access alternative units in an emergency.

The comment from the person who 'agreed' to this didn't marry up with the comment they left so it should be assumed this was 'agreed' in error and this person actually disagreed with the proposal.

Please state whether you agree/disagree/neither agree nor disagree with proposal 3:

Increase the capacity at Providence Road, Bromsgrove by the flexible use of one or two additional bedrooms (subject to the necessary changes to the Ofsted registration) as required

Agree - 12
Disagree - 13
Neither agree nor disagree - 19

Of those that agreed with this proposal, all said that an increase in provision and to make use of the bedrooms that are currently not used would be welcomed to offer more families respite, or flexibility for those currently accessing respite. There was also a comment around ensuring staffing levels would increase accordingly.

Of those that disagreed with this proposal, this was because of the below reasons:

- Providence Road would not be able to meet the needs of the children who currently access Ludlow Road and would jeopardise the quality of care received by children accessing both of these units
- Adding two extra bedrooms wouldn't meet the demand for overnight respite
- Providence Road is too far to travel for families who live in the north of the County

Of those that neither agreed nor disagreed with this proposal, this was because of the below reasons:

- Adding capacity at Providence Road shouldn't come at the cost of stopping provision at Ludlow Road.
- Agree to increase beds at Providence Road to meet needs however not for children with complex health needs unless the right staffing and equipment was in place
- Concern about the mix of children with high level health needs with those who currently access Providence Road

Please state whether you agree/disagree/neither agree nor disagree with proposal 4:

Review the use of Osborne Court unit in Malvern to ensure that the current capacity (including the use of the two bed emergency and assessment bungalow) is used effectively.

Agree - 19
Disagree - 9
Neither agree nor disagree - 16

Of those that agreed with this proposal, the majority agreed to reviewing this provision to ensure it is meeting needs of all children and young people. Many added to this and said that any review should not be detrimental to the families who already access this provision and be used to identify where provision could be improved or increased. It was also added around ensuring staffing levels are increased accordingly. One comment said that provision for teenagers would be good to allow a smoother transition to adult services for young people. Another said that the alternative bungalow could be used for regular respite.

Of those that disagreed with this proposal, many said that this shouldn't come at the cost of stopping provision at Ludlow Road. Other comments included:

- Osborne Court sounds like it's a mini institution and not the 'home from home' unit like Ludlow Road
- Concern for what would happen if these beds are needed in an emergency, as they are meant for now, as well as the flexibility for the families who currently access this unit
- Distance to Osborne Court is too far for some families

Of those that neither agreed nor disagreed with this proposal, most did not comment. Of those that did comment, it was because they didn't know enough about this provision to comment or that Malvern was too far away to access so it was irrelevant to comment. Other comments said that any review shouldn't affect the families currently accessing this must needed provision. Another comment said that this proposal would make sense because of the waiting list currently in place for Osborne Court however they would be concerned that the mix of children accessing this unit on different nights would reduce the flexibility of when children can attend the unit.

Considering all four proposals as a whole, do you feel that the overnight short break needs of you and your family or the families you work with can be met?

Out of the 38 people that commented, below is a breakdown of the categories of responses:

12 – No, needs would not be met if Ludlow Road was to close

11 – Needs are currently met by other provision (and wouldn't want things to change)

6 – Needs aren't being met now and these proposals don't seem like they would help that

3 – Yes, to ensure units are being used effectively

2 – No

4 – Not sure, would need more information to comment

Additional comments

A lot of comments have been provided around the value of respite for parent carers and the positive effect this has on the whole family and their ability to continue providing care for their children. The majority of comments provided focus on the negative impact these proposals will have on families; particularly those accessing Ludlow Road. Many comments shared a concern that there currently isn't enough respite and/or that these proposals will reduce the amount of respite that is available.

Other comments detailed concerns for how the consultation has been carried out and some requested more information about costings and current/anticipated need as well as involving families more in the review to ensure that needs are properly met.

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What is your interest in overnight unit based short breaks? Please let us know whether you are a:-	Please state whether you agree/disagree /neither agree nor disagree with Proposal 1 (review needs of all families currently accessing overnight unit-based provision)	Please comment on Proposal 1 in the box below;	Please state whether you agree/disagree/neither agree nor disagree with the Proposal 2 (cease the delivery of overnight provision at Ludlow Road, Kidderminster)	Please comment on Proposal 2 in the box below;	Please state whether you agree/disagree/neither agree nor disagree with the Proposal 3 (increase the capacity at Providence Road, Bromsgrove)	Please comment on Proposal 3 in the box below;	Please state whether you agree/disagree/neither agree nor disagree with Proposal 4 (review the use of Osborne Court, Malvern)	Please comment on Proposal 4 in the box below;	Considering all four proposals as a whole, do you feel that the overnight short break needs of you and your family or the families you work with can be met?	Please include any additional comments you have here:
Provider	Agree	This should be done on a regular basis anyway. However, to see what support parents need, not as a means of cutting services.	Disagree	Providence road is not able to meet the health needs of the children that attend Ludlow road. Half of the children have gastrostomy`s/ PEGS. Even if the staff at Providence road had training to administer feeds and medication they would not be able to deal with problems such as replacing tubes that get pulled out or that get blocked. Many of the children have unpredicatable health/ seizures, etc which staff at Ludlow Road road are able to deal with rather than calling an ambulance or parents. There are children at Ludlow road that are ventilated or need oxygen. Providence road would be unable to administer oxygen or provide care to children that are ventilated. Many of the children are on multiple medications or complex medication regimes. For unqualified staff to administer these, it massively increases the risk of errors. Ludlow road staff have close links with the orchard team, paediatric consultants, physio, OT`s and school nurses which is vital to consistant, safe care for these children. Worcester is well served by Osbourne Court and Acorns. There will	Neither agree nor disagree	If the need is there then I would not object to an increase in beds. However, I would disagree to these beds being used for children with complex health needs, unless a registered nurse was to be present. Consideration around staffing levels would be needed.	Neither agree nor disagree	As Osbourne Court normally has a waiting list this would make sense. However, as with other units, many of the children go there for geographical reasons, rather than needing nursing care. As there is no social care provision in that side of the county there is often no choice. I do not think that vulnerable children should be attending at the same time as children with challenging behaviour. Ludlow Road provides a safe environment and parents know that their child will be safe and not exposed to agression. If these groups are kept seperate then this reduces the flexibility of when children can come in.	No. as per comments regarding closure of Ludlow road. Ludlow Road is the best suited unit for the type of children that attend there. By closing ludlow road, many of these children will end up without a service or one that does not meet their needs.	

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				be no health provision this side of the county, just two social care units. How is that equitable for children with profound disabilities and complex health needs. It is unfair to expect children with complex health needs to travel from this side of the county to Malvern. Just by reducing the number of beds at Ludlow Road to 4, due to Ofsted, would be enough to give Ludlow Road 100% occupancy and would at least fill another bed at Providence Road. The County Council should be negotiating with WHCT regarding the amount that they pay for the service. How can Ludlow Road cost so much more than other services .						

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Professional	Agree	This service needs to be reviewed with a view of increasing the overnight provision for families within the district	Disagree	This service is essential for the continuing needs of the families of vunerable children within the county. There is no other provision within the north of the county which will be able to accomodate these very vunerable children. Providence road is not a suitable alternative as firstly they are unable to cater for the childrens medical needs and secondly they have children who would put the more vunerable children of Ludlow Road at risk. Ludlow Road is run by a team of highly trained, competent staff with many years experience of working with the most vuneranble of our society.	Disagree	The increase would not be of benefit to either the families within the county or the children who presently use the service.	Neither agree nor disagree		The families who use Ludlow Road Short Break Service would be the ones who would be affected the most. They would not get the necessary respite needed for them to continue caring for their child in an effective way. For many families the knowledge they are getting a regular break is the difference between coping and going into crisis. Many families do not want the impersonal and sterile settings provided by the other facilities within the county and are happy with the home from home service Ludlow Road provides.	Its a shame the people who are making these rediculous decisions actually took some time to go to the service providers, not just a quick half hour look around, and met with the service users and their families on a day to day basis to see just how hard it is for families to cope one day to the next.
Professional	Agree	A review of current services is essential to ensure families have access to sufficient and appropriate provision, that is not too far from their homes.	Disagree	My experience is that Ludlow Road provides are far more superior service to Providence Road. Geographically, Providence Road is not as accessible to families living in the west of the county, i.e. towards Tenbury, should they be accessing the provision over week-ends/holidays.	Neither agree nor disagree	This may be appropriate but not at the cost of losing Ludlow Road. It is not simply a matter of number of beds; the quality and location of provision must also be considered.	Agree	This is a very useful facility and its use should be evaluated to ensure most effective deployment of resources.	Extremely concerned at the potential loss of Ludlow Road for the reason outlined.	
Parent/ carer	Agree	Ensuring children's needs are met appropriately is paramount carers are in extreme need of this	Disagree	Closing Ludlow road would devastate many children and families who have taken an extreme amount of time building up trusting	Disagree	This is unnecessary if Ludlow road stays open	Disagree	This is unnecessary if Ludlow road stays open	Mine and my child's needs are already being met by Ludlow road, changing this would have devastating	

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		provision		relationships. The transition of moving children could have a strong negative impact on children who already struggle daily					consequences	
Parent/ carer	Agree		Disagree		Agree		Agree		Four beds will not meet the needs of the County.	
Professional	Disagree	Very concerned on the major impact this will have on the families and the children.	Disagree	It's such a shame that it all comes down to money. I don't think the county council have given a second thought to the impact that closing Ludlow Road will have on the children and families. For 31 years Ludlow Road has been run as a six bedded unit!!! No thought into how far the children will be having to travel to new placements. The experience and expertise the staff have at Ludlow Road, the fact that new staff will have to be employed and trained. Providene Road is Social care funded where as the children who attend Ludlow Road are health. What provisions are there left within south of the county???? How many families will be needing extra care as they go into crisis, not being able to cope as the overnight provision will be cut. These are the most vunerable children and its so sad that the council don't think of them and their needs in all of	Disagree	stongly disagree with this, they are funded through social care and don;t have trained nurses 24/7, the children who attend Ludlow Road have complex health needs. How will the families still receive the number of overnights they currently have.	Disagree	Osbourne Court, as one of the councillors described it as a "mini hospital", this to me means mini institution. Ludlow Road is a home from home unit, it wasn't a purpose built home.	They can certainly be met if Ludlow Road stays open and instead of closing the unit actually think of was of utilising it.	I just think that maybe these people who have put these proposals together should actually come and spend a day in the life of the families and at Ludlow Road. Not just pop in for 5 minutes then belittle the service we provide. The staff at Ludlow Road are such highly skilled nurses and i feel this was not explained at the meeting, it was not explained actually what we do. He said something about we work with children with physical disabilites and peg fed, the way Ludlow Road was described was insulting.

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				this, all their concerned with is how much money they will be saving.						
Parent/ carer	Agree	I think it is a good idea making sure your child's needs are met and kept upto date.	Neither agree nor disagree	My Son does not stay in this area.	Neither agree nor disagree	My Son does not stay at Bromsgrove.	Agree	I think this is a good idea that you should have emergency access to the bungalow if it is needed and used to its capacity.	I think they can I have been happy with Osborne Court and I know my Son loves staying their and they are great supporting his needs.	
Parent/ carer	Agree	definitely as needs change all the time	Neither agree nor disagree		Neither agree nor disagree		Neither agree nor disagree		No my child use to receive short breaks, as they didn't assess her needs properly she lost out	More parent involvement so needs are meet properly
Parent/ carer	Agree	Ludlow Road should be kept. Moule close is invaluable to us.	Disagree	No. People rely on it.	Neither agree nor disagree		Neither agree nor disagree		At present our needs are met with moule close	
Parent/ carer	Agree		Disagree	We know that this will severely impact those families accessing short breaks at Ludlow Road and will affect those currently accessing services at Providence Road - both sets	Neither agree nor disagree	We would be concerned that the mix of children with high level health needs would change the type of environment currently experienced at Providence Road	Neither agree nor disagree		The needs of families are currently being met and need to be sustained as they are	The plans are a cynical way of suggesting that this is all about 'meeting needs'. It is potently a way of dealing with budget cuts and will affect families of disabled children in a very negative

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				of families will suffer.						way. Any diminution of support could result in the taking into care of children on a long term basis and this needs to be seen as a false economy.
Professional	Agree		Neither agree nor disagree		Neither agree nor disagree		Neither agree nor disagree			
Parent/ carer	Agree	I agree on the basis that the review is unbiased and in the best interest of the both families and children involved. This should not be merely a cost cutting exercise!	Disagree	After reviewing the figures, I fail to understand how the closure of Ludlow Road will improve flexibility or cost effectiveness. These children have complex needs that often require medical intervention. Specialist equipment and training will be required to meet their needs elsewhere. There are serious safeguarding issues mixing these children with children who have behaviour issues. You are putting them at risk of harm, which will have a detrimental effect on their mental health and well being! Many of these children are non verbal so they are unable to speak out when issues occur.	Disagree	Two beds at Providence Road will not meet the demand for overnight respite. It is very short sighted to think that the demand for overnight provision will not increase in the future. There will not be flexibility of dates when families require respite if more families are accessing the centre.	Disagree	What would then happen if these beds were required for an emergency in the future? It is ridiculous to think that this could not happen! This would mean that these beds may not be available for respite provision. The distance from my son's home and school means that going to Osbourne Court is not an option anyway!	My son's needs are met at Ludlow Road!	I have had my 1:1 consultation and I am very disappointed that a social worker attended that had never met my son before! I was also very disturbed that no notes were made during the meeting so I wonder how my views, concerns and questions can possibly represented effectively by these professionals. I would like to make a formal complaint about the process as I believe that this consultation has not been conducted in a fair manner. Please send me details how I can take this matter further?

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Professional	Disagree	The need to address the requirements of families is paramount.....But if it isn't broken, don't fix it! It appears that what is currently in-place works well for the families in-question.	Disagree	These children who you are deciding what is best for are not like your children/grandchildren. These children need constant care, which is draining and extremely hard-work both mentally and physically for the parents involved. The life these parents have are on equal par to a new parent with a new born baby. This way of life goes from the day they are born to the day they break and/or can no-longer look after their child, or if the worst happens.....this is not a normal life. The closure of one specialist unit to fill the beds of another unit is false economy. The specialist nursing care that is required by the children, can not possibly be accommodated for in another non nhs facility. Unsettling the children who are currently or about to go through transition would be detrimental to their emotional state and something that should not be taken lightly. The need for qualifed nurses and highy trained care staff is essential when caring for children with complex health needs. The condition of the child with complex health	Neither agree nor disagree	The compatibility of children using the same service should be questioned and looked at, The children that would need to be accommodated in this provision have health issues, no independent mobility and are wheel chair users. Is it appropriate or fair for children who are wheelchair users with no mobility and PEG feed to be with other very mobile children, who through no fault of their own could prove a risk and be intimidating to those children who can not remove themselves from a potential risk or situation they or not comfortable or scared of? The health needs of the children and boundaries and capabilities of the staff need to taken into consideration when carrying out clinical procedures/practices.	Disagree	What happens to any emergency referrals if the beds are used for respite? The emergency bed facility is essential across Worcestershire. This will limit the availability and flexibility for the current families. Children who exhibits challenging behaviours while in respite are removed from the environment for safety of themselves and others into this area. What on earth will happen to the children involved if a place of safety is not available.	The current and existing method appears to be the best as they accommodate all parties.....except for the county council who want to swing the axe as its the easiest and quickest method of reducing costs. Direct care payments are not always the way forward for some families. A total break and a method of recharging your batteries is a must. The ability to have a 'normal' life just one day a week. The importance of putting other siblings first and doing what they want to do. Having piece of mind that for just 24 hours their child is safe, secure and well looked after is motivational in itself to cope with what is coming day in, day out. A good nights sleep, relaxing in your own home, having a glass of wine to unwind and privacy without some stranger in the next room is a basic right for these parents like it is for us!	The cost of Ofsted provision should not be included in the proposal, as both NHS facilities would require this, but only one is mentioned. Budgets, expenditure and costings should be looked at firstly, with questions asked.....2 nhs services, mirror image of each other with regards to staffing, one has more facilities and is open more than the other, yet the cost is so drastically different? Please look at what your life is like and measure it against those lives of the parents you are making decisions for and ask yourself would i want, like or put up with this for my child and loved ones?

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				needs can change dramatically in minutes. Would a social care provision be able to accommodate a child if their button for PEG feeding came/pulled out or there was a blockage? Out of all the procedures that are required this is the most common, but referral to hospital is the usual requirement, unless of course they are at Ludlow Road, who can carryout this procedure. I understand Ludlow Road currently closes 2 nights per week.....opening more nights after dropping down to 4 beds, would this not accommodate the need anyway?						
Parent/ carer	Agree	For my case, this is discussed and reviewed by my social worker annually, which I find it helpful.	Neither agree nor disagree	I do not have knowledge of the provision in the north of the county.	Agree	Increase capacity and flexible is necessary due to the increase of children with complex needs.	Agree	I would support the review with the intention to ensure the unit is used effectively and flexible to support our children needs.	Yes, if this is not become a cost cutting review, rather than to ensure the units are used effectively and design to be more flexible/available when carers/children needed the most.	Parents/carers need to be involved in the review. Children should also have their say.

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Parent/ carer	Neither agree nor disagree	My son's needs are already reviewed annually by his social worker. I cannot comment about other families.	Neither agree nor disagree	I know nothing about the current provision at Ludlow Road.	Disagree	This was considered about 3 years ago when it was proposed that Providence Road and Moule Close would be combined. After several consultations nothing came of it. Waste of time and money.	Neither agree nor disagree		The provision at Moule Close - number of nights and the staffing/set up at the unit - works well for my son and our family as it is now. For us, I don't see the need for change.	
Retired social worker	Agree	I agree with regular reviews but I think that you need to be ensuring that the needs of carers and children with disabililties ARE MET IN THE BEST POSSIBLE WAY FOR THEM - NOT TO FIT IN WITH WHAT THE COUNTY THINKS IS APPROPRIATE OR AFFORDABLE.	Disagree	Why cease overnight provision at Ludlow Road? Is it because the provision is not up to standard? (or is the land valuable to sell for building?) If it is good provision why subject users to having to go through change? What is the reason to reduce the number of beds? Are there not so many people needing this help? What is the reason to cease all overnight provision at the end of summer term 2018? Is it a purely money saving reason?	Neither agree nor disagree	It depends on the service which will be provided. What does the Ofsted registration require? I am all for increasing provision of good services if they are needed.	Agree	I agree with reviews to make sure people are getting the best possible service. I do not agree with reviews in order to reduce service and if it is just a money saving exercise.	I am not able to answer this as I do not know the centres or the families. However, I would hope ;you will listen to and act on what the families who are helped by these centres tell you and not give in to government pressures to save money. This is a rich country and we can afford to provide the very best services for those of us born with disadvantages. Do any of the people making these decisions have any personal experience of caring for severely disabled children and/or adults? Have they ever been absolutely exhausted and in despair not knowing how they are going to cope - just needing a good uninterrupted sleep?	See question 11.

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Parent/ carer	Agree	I agree in principle with the need to review how provision is being delivered. Of course it is important to ensure the needs of young people and their families are being met in the best possible way.	Disagree	It is not appropriate for the families of children supported by short breaks at Ludlow Road to have this service transferred to other providers as those children have additional medical needs that can only be met by the level of staffing and expertise at Ludlow Road. I don't see how you can safely "tag" that responsibility onto another short breaks unit? The complexity of need simply cannot be catered for elsewhere. Furthermore, it takes families of children with disabilities (usually owing to their communication difficulties as well)a long time to put their trust in a short breaks centre to care for their child and they don't leave them there lightly. To pull this service is detrimental to the families and it would only represent a very short term saving to the council. In the long term, you cause devastation to the families of the most vulnerable young people in our community. It is very short sighted to believe this is an effective option!	Disagree	For the reasons stated above, this is a short sighted cost-saving exercise. It surely puts extra pressure on the service at Providence Road, thus jeopordising the quality of care received by all young people involved.	Agree	In line with ensuring the needs of all young people are meant, I agree in principle with reviewing.	Whilst the above proposals would not appear to impact directly on my family, as we use Moule Close, I am very much against seeing the service squeezed county-wide. It is devastating and upsetting to perceive that short breaks care is under threat for any young person and their family that needs it. For our family, I can't put into words in a small textbox like this what it means to us to have the opportunity to recharge our batteries, have a break from being hyper-vigilant keeping our child safe 24/7, to focus some much-deserved attention on his sibling, not to mention the enriching experience for our child of having somewhere that is his, where he gains a sense of independence and involvement, when he is excluded from pretty much every activity a child his age would typically access with ease. I could go on!..... For the families of children at Ludlow Road, you add to that	

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									the knowledge their child's medical needs are being fully met. You just cannot close Ludlow Road, it's unthinkable!	
Parent/ carer	Agree		Agree		Agree		Agree			

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Parent/ carer	Agree	We were offered overnight short break provision but after trying it found the provision was not suitable yet as a family we still require this service.	Neither agree nor disagree	Agree in principal if nursing staff will be available at Providence Rd to meet the needs of existing users. However when we used Ludlow Rd it was always full so not quite sure how reducing a provision will help.	Disagree	Increasing capacity by that limited amount is insufficient especially itsking into consideration the upcoming needs of young persons growing up within Worcestershire.	Agree		Options offered are extremely limited and the whole process of accessing them is extremely long winded. When families request short breaks they are usually at breaking point yet for us the process from requesting help to actually being able to access the overnight provision probably took about 6 months. The provision is sought after yet does not seem readily available and information is not forthcoming ie I never realised until I completed this survey that there was emergency provision as our son was only recently hospitalised for 2 nights to help our family (ie for respite) as there didn't seem to be any other option. The provision for complex health needs does not seem to offer the child the same opportunities as for those without health needs which I feel is discrimatory. The time taken to be approved to access te service therefore needs	We found that the service did not meet the needs of our son and so had to stop using i. This was not through lack of need but lack of suitability.

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									to be much quicker. There seems to be a gap in service provision for children with complex health needs and whom are physically mobile and verbal.	
Parent/ carer	Disagree	I do not believe the purpose of this review is to make sure children and carers are getting the overnight unit based provision they require, but a cover story to look at venerable targets to make cost savings. ALL of the families I speak to have the minimum amount of support required to be able to cope and prevent their families from imploding under the immense stress and pressure having a special needs child	Disagree	This proposal is an absolute nonsense! Ludlow Road, along with the other unit based respite facilities in the area is not a luxury for the families using them, they are critical to keeping these families together. It takes a long time to build trust and a relationship with the staff at these facilities, giving families a small period where someone else can care for and support their child, allowing time to hit the 'reset button' so as a family they can give the child the loving and supportive environment they need to reach their full potential.	Disagree	As far as I understand it, these 'extra' beds at Providence Road and Osborne Court are emergency beds, that provide respite and support to families that are in crisis. Unless you have been in this situation, which I have, where you are at breaking point, because of the 24/7 demands a special needs child can put on a family, you can not understand how important these short break care facilities are.	Disagree	We are fortunate enough to have access to the support of Osborne Court, Lois and the team are our Son's second family, the level of care and support is amazing. I truly believe that this facility is run extremely efficiently and that any 'interference' is just an excuse to save money by targeting societies most venerable, the very people the system should be helping.	NO. No matter how you spin it, closing Ludlow Road not only devastatingly impacts the 20+ families that rely on that support network, but it will have a knock on effect to the other short break facilities and the families that rely on them.	I desperately urge you to put your self in our position, the level of support on offer now is barely enough, we are families that spend our lives on the edge of coping, all we ask for is enough support to enable us to be the best parents we can, to all of our children.

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		puts on the entire family.								
Parent/ carer	Agree	I understand a review is necessary but would stress our concern at the possible loss of Ludlow Road and the impact it would have on our daughter	Disagree	We are distraught at the thought of the loss of Ludlow Road and its impact on other provisions and most importantly impact on our severely disabled daughter	Neither agree nor disagree	We remain hopeful Ludlow Road will remain, if other children need this facility then expansion may be the answer	Neither agree nor disagree	Malvern is so far away from us it is irrelevant for me to comment	They are currently met and we wish this provision to remain	
Parent/ carer	Agree	It would seem sensible to review the current and anticipated needs of all families involved to assess need and then design future service around this	Neither agree nor disagree	I do not feel able to comment on this as I do not understand the capacity of Ludlow Road and how this demand could potentially be met at other centres	Neither agree nor disagree	I do not feel able to comment on this in terms of an alternative provision for children from Ludlow Road. However it would seem sensible to increase flexibility and capacity of additional bedrooms.	Disagree	I am aware that the current demand at Osborne Court is already stretched and there is a need for the emergency beds in the annex	I would be extremely concerned if our current provision at Osborne Court is reduced or reviewed as our son attending here is sometimes the difference between coping and not coping	I strongly believe that the correct way to start the consultation would be to assess the current and anticipated needs of children involved. Only then can you review and plan for an effective delivery of services. You would also need to plan in a reasonable period of transition to any changes to ensure children are able to cope with any new arrangements as disabled children need additional time and resources to become familiar with new circumstances

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Parent/ carer	Agree	It is very important that provision suits the needs of the individuals who use it	Neither agree nor disagree	This doesn't directly affect my child but I imagine this would have a huge impact on the families and children that it does. If my child's provision was closed, I know it would have a detrimental affect on our child who finds change incredibly upsetting resulting in high anxiety and insomnia which then affects the whole family	Neither agree nor disagree	I am not familiar with this provision. Some children might find it hard if there are large numbers of people staying at one time.	Agree	My child will soon be 17, I understand that when they are 18 they move to the adult bungalow. I wonder if this is a straightforward transition with no gap in provision (I have heard of bed shortages and unused spaces in adult provision). Also, young people tend to stay at special schools until they are 19. Would it be possible, to avoid too much change, that they stay with the same overnight provider until they are 19? If the young person was to go onto residential college at 19, it would avoid them needing to familiarise themselves with new overnight respite for just one year. There can seem quite an age gap in the people using the service. A provision for teenagers would be good. The staff at Osborne are very dedicated and adapt to meet the changing needs of my child. We are very grateful for all	Without knowing the number of people wishing to access the short breaks and the amount of provision and staffing required, it is difficult to comment. I know waiting lists can sometimes be long and this could be hard if families are in great need of respite.	It would be nice if the provision at Osborne Court could make use of the hydro-pool. A sunken trampoline would be easier for some young people to access. Additional activities for young people would be good. My child has complex needs - physical disability, severe learning difficulties, autism and needs medication administering. He struggles with noise and large groups of people.

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								that they do to support us.		
Parent/ carer	Disagree	As a parent of a disabled young person, we have reviews to make sure families are accessing the right short breaks and the correct amount of nights - if there are concerns we can raise these at any time. It is a waste of funding to re-do this - just a paperwork exercise	Disagree	Families accessing Ludlow Road have done so for a long time in some cases. The children have medical needs on top of behaviour etc. Providence Road is mainly geared up for those with less medical needs i.e. tube fed is something Ludlow Road have all the time - they have trained nursing staff on site to assist with this which Providence Road don't have	Agree	I agree they need to use the extension Providence Road unit was added 3 years ago!! And has been left unused... this is ridiculous as it could help more families who need overnight respite to help alienate some of the stress and stop families going 'into crisis'. The rooms are set up ready for use just gathering dust!	Agree	If like Providence Road they have unused beds then yes a review is required. However, this should not be detrimental to the families who already use the facility.	With our family it works very well. Other families seem to say the same, however the proposals have put a lot of stress on the families at Ludlow Road and Osborne Court. With the uncertainty of their provision, it takes us back 4 years ago when Providence Road was developed - and what for?? It's lain empty since it was built! Shocking, not to mention 'Little Oaks'	Special needs group were 'evicted' and had to find a new place to hold a very valuable service to children and families with disabilities. As a parent of a child with disabilities, please don't make our lives any harder of stressful than they already are!
Parent/ carer	Agree	I agree with the review taking place as long as it is with improvements in mind rather than simply to lower costs. Any cost-cutting will be default decrease the	Disagree	Any cessation of overnight provision, particularly in the well-populated area of Kidderminster that requires it, is unacceptable. There already is not enough provision. Rather the existing provision should be	Agree	As above, any improvements are warmly accepted as necessary	Agree	I agree, conditional that review means that existing provision is improved and/or increased. There already is not enough.	For our daughter, Osborne Court is great. The facilities are superb and the only thing I would say to improve is to increase the number of staff as they cannot always use the	As Osborne Court has sometimes been fully booked when we require it (usually at weekends especially Saturday night) it is clear that any lessening of overnight provision in the county as a while,

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		quality/amount of provision		enhanced.					hydrotherapy pool (existing facilities) if not enough staff at the time to attend and oversee the guests using the facility.	would be unacceptable for any of the families with members using these facilities. Thank you.
Parent/ carer	Agree	We understand every child has an individual need. However, carers that have no other family support ie grandparents, aunts, uncles, should be given the option to use the overnight facility	Disagree	We understand, costs and cutting needs to be met, however a main point to consider is if the overnight moves north of the county and the carer has no transport/doesn't drive, Bromsgrove facility is out of reach	Disagree	If this means loosing the Kidderminster facility, I disagree. It would be better to have 2 small facilities than lose 1 altogether.	Agree	Periodic reviews are a good thing to make sure it meets peoples needs	We are unsure, but would hope so. We are willing to enter into discussions to establish this.	We currently have a respite entitlement that is invaluable to us and our son. We could benefit from additional respite from time to time that may be chargeable when a carer needs a full complete break including overnight stay so they can re-charge their life to be ready for their next challenges of care
Parent/ carer	Agree	I think all families needs should be reviewed and what is best for the child taken into consideration not just for the convenience of where to build bedrooms	Disagree	Ludlow Road is a convenient and much used overnight provision. We were looking at our son going there for overnight stay. Bromsgrove and Redditch are too far for him to travel after a long day at school as he gets very agitated in taxi if waiting	Neither agree nor disagree		Neither agree nor disagree		Not at the moment, no. We need somewhere not too far away from Wyre Forest school that has or can cater for a specialist (safespace eg) bed. Our son has quite complex needs and would get very grabby and agitated if he had to travel far.	
Parent/ carer	Agree	I am very reliant on the respite that my son receives at Moule Close as it is very valuable to me and my son	Disagree	This will have a major impact on the respite my son and others have at Moule Close and other respite units. There needs to be more respite units across the county rather than less	Neither agree nor disagree		Neither agree nor disagree		At this time this will have a major impact on the children's respite as there are not enough beds/rooms at this time before the changes have been made. It is very valuable for me to have the respite as this is my only option for my son to go overnight for	

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									a break.	
Parent/ carer	Agree	Happy if the review brings a positive outcome for everyone	Disagree	Very concerned if there will be less beds at a provision	Disagree	Don't feel that increasing just to a few beds will be enough to supply everyone with the same service	Agree	The alternative bungalow could probably be used for regular respite	No, I can't see this if Ludlow Road is to close	Surely parents will be offered less respite hours
Child/ young person	Agree		Neither agree nor disagree		Agree		Neither agree nor disagree		Yes	
Parent/ carer	Agree		Disagree		Agree		Agree			
Parent/ carer	Agree		Disagree	Closing down Ludlow Road would take away services for other service users at other venues	Neither agree nor disagree	Does that mean more staff?	Neither agree nor disagree	Do not know enough to comment	At present but I doubt it if other people used the services	
Parent/ carer	Disagree	The overnight break system works for many vulnerable families, why put this at risk	Disagree	Ludlow Road is specialised in physical disabilities, and the children's needs would not be met elsewhere, adding stress with the travel	Disagree	Too far for "local offering"	Disagree		The proposal would not meet the needs of the Ludlow Road families	
Child/ young person	Agree	There is nowhere near enough overnight/short stay provisions	Neither agree nor disagree		Neither agree nor disagree		Agree		NO!!!!	

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Parent/ carer	Neither agree nor disagree		Neither agree nor disagree		Neither agree nor disagree		Neither agree nor disagree			We currently have 2 young people who we care for and who attend the Wyre Forest school. Although we do not access overnight accommodation, as a carer of children with challenging needs and abilities we totally support the provisions detailed in this questionnaire. The nature of our work means we can at anytime be asked to care for children with a variety of special needs, therefore it is vital that the resources are available, local to the child's foster placement. These provisions when needed can have a huge impact when considering the placements we consider, and the positive effect they have. Caron Wait, Foster Parent. NB any loss in respite provision would effect many struggling parent/carers
Parent/ carer	Agree	I feel my son's needs are met at Moule Close, the staff are fantastic and all of them go above and beyond to ensure he is happy and safe	Disagree	Families who use Ludlow Road and their children rely on that help and need that consistently for the child and the family needing the help and support. To close this down would leave extremely vulnerable families without the help they need the most!!	Disagree	Disrupting and causing undue stress to vulnerable children/their families when at Ludlow Road they are familiar and feel safe there would be extremely cruel to the child/families in need	Neither agree nor disagree	Ensure all of the current families who access Osborne Court aren't affected as this is a service these families desperately need in order to support their child/young person due to their disability.	I feel myself as a parent of a child with a disability Moule Close always meet his needs. He feels safe and happy when at Moule Close and as a mum to feel happy and safe with your child being looked after by someone else and knowing he gets the support he needs is so	I feel lots of families need help/support when caring for a disabled child/person. Therefore to close Ludlow Road would leave lots of families without the help/support they need and put undue stress on other short break provisions which when then affects the families who currently use that

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									reassuring.	provision
Parent/ carer	Agree	Personally I think all care/rest care provisions should have regular reviews to make sure needs of staff and children are being met and also reviews of families to make sure if of any changes the appropriate needs are still being met.	Neither agree nor disagree	I don't feel I can comment as I don't use or know enough about this unit.	Agree	Extra capacity is always needed wherever the area.	Agree		Obviously all parents would like more restcare and as my son's older, this would be very appreciated especially as I've been diagnosed with an illness.	
Parent/ carer	Agree	Whilst I do not yet access the short breaks facility I will need to in the near future	Disagree	Why on earth are the number of beds being reduced when provision in our area is so poor! I live in the Wyre Forest area, NOT Bromsgrove or Malvern.	Disagree	Too far for me to travel!	Disagree	Too far for me to travel!	If Ludlow Road is closed, the stress on Wyre Forest families will be huge. The people who make these decisions have NO IDEA of the effect this will have on families. Travel time will be increased. 2nd the amount of time offered to our children will be reduced. The support offered to families like mine is minimal and as yet I have managed to not use an overnight service but in the future I will need to - BUT NOT IF MY CHILD WILL BE IN BROMSGROVE OR MALVERN. I am	

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									disgusted that Ludlow Road may close!	
Parent/ carer	Agree	I wish to find out how to get my child in. It is much needed help for parents/carers/children	Disagree	An utter disgrace. These units are needed.	Agree	Yes	Agree			
Parent/ carer	Agree		Disagree	We are out of county but on the border of Worcestershire and Shropshire. Having access to such a facility on a site the children are familiar with is invaluable. Our child would have to travel a long distance or go without such opportunities if she ever needed overnight care.	Agree	Flexible would be great for those families who only need/require access every so often or for children who would benefit from short breaks to adjust to staying away.	Agree		With so few beds and options available the needs of many are not met. Many parents do not even know how to access the short breaks units as we do not for our daughter.	
Parent/ carer	Agree	Yes its very important that children are safe, needs are addressed appropriately and that they are engaged in a range of activities whilst giving the families suitable breaks	Disagree	Continuity is important for both children and families. Cost saving by making cuts effecting the most vulnerable, could end up costing in other services, when families find it harder to cope	Agree		Neither agree nor disagree		Unsure	

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Parent/ carer	Disagree	This option is a smoke screen. Needs are being met. If funding is withdrawn this will reduce services and needs will not be met. Funding should be granted to keep all units open and beds for respite available. Consideration should be considered for families to source funding via personal payment plan.	Disagree	The need to reduce the number of beds to four is damaging the quantity and quality of availability which will fail to meet the needs of families needing respite. As ofsted registration should focus on meeting clients needs in insuring provision. closure of any unit or reduction in beds will fail to ensure the continued excellent service disabled families currently. It is a human right where supporting disabled children and families should be the priority not the amount of funding costs.	Neither agree nor disagree	If this is in reference to a closure of another unit, this is not helpful to families using Ludlow road.	Disagree	This proposal is being used effectively. No changes are required.	I feel that the solution is to grant the funding for Ludlow Road, as families feel any changes to current provision will lead to diminished services, leaving vulnerable people and their families at reduced risk of stress, upset and diminished quality of life. This essential respite is working outstandingly in its service for families who give full time care the resulting success of all the placements prove how essential it is that this service continues to be available in the very long term.	It is clear that funding is the reason for the proposals and failure to address a proposal to continue this should have been in the proposals and options put forward for consideration. Failure to procure funding will fail many children and their families. to imply in proposal one that this consultation is needs led/met is deceptive and misleading. Families are happy with the current service. Ofsted guidelines cannot disrupt, put pressure on services with reducing them. I would hope ofsted would work in a client person centered way and ensure measure to allow all funding to be delivered through every means testing direction including personal payment plans sourcing where families can contribute to source the continued bed availability.

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Parent/ carer	Neither agree nor disagree		Neither agree nor disagree		Neither agree nor disagree		Neither agree nor disagree	Why has everything got to change unless it's all about money? Why should it not be about the care our children get and not about the cost?? Osborne Court do a fantastic job, where I know my son is safe happy and his medical needs are taken care of. Why does it come down to the cost and not the best interest of the child. My child is in a medical unit for medical needs and we are made aware there are no other units for this. I as a parent think the times and how this has been dealth with is totally wrong. The very little time we have been given to address all of this issues, we should have been told way before and given more time about everything that is happening	Neither agree nor disagree	

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Parent/ carer	Agree	Although I have ticked agree, I do feel that I have a regular review on my daughter's needs and I do feel about to contact by social worker to discuss any change in needs at any time. I do however appreciate this may not be the same for everyone.	Neither agree nor disagree	I do not access the service in Kidderminster and I do not know the impact it may have on families accessing the service however if alternative can be found that meets the families needs that is more realistic financially then potentially this should be considered. However for a lot of the children accessing this service change is extremely difficult to handle and may cause more problems. Have the additional transport costs been considered as families will have further to go in emergencies. Has it been considered that the outlay of Ofsted cost now whilst service is not in crisis would be proactive in terms of ensuring the service is available for the ever increasing demand.	Agree	As long as doesn't affect the service for those already accessing it and staffing levels will increase accordingly	Agree	As previously said as long as this doesn't have a negative impact on those children already accessing the service and that staffing levels are increased accordingly	I do (as my daughter goes to Osborne Court) feel that our needs can be met as long as with an increase in children there is an increase in staffing numbers and still the ability to ensure that the group of children attending at any one time are able to build friendships and have similar levels of disability.	The respite service provided by Osborne Court has been invaluable - it has given my daughter the opportunity to have sleepovers and make friends in a safe environment when her behaviour has been challenging with her need for night monitoring. It has enabled me to get the rest I have needed, knowing she is safe, to recharge. Although this review is about ensuring that the overnight provision is still available to families who need it I hope increasing numbers of children will come with increased numbers of staff and that they will still be promoted to families as an option in the future as an equal to other available, maybe less costly, options.

19th February 2018

Worcestershire Health and Care Trust (WHCT) response to Worcestershire County Council (WCC) Consultation on the re-design of overnight unit-based short break provision for children with disabilities

The services in scope of the consultation are the four WCC funded/commissioned overnight short breaks units. Two of these units; Providence Road and Moule Close, are delivered by WCC and are registered with Ofsted. WHCT are currently commissioned by WCC to deliver overnight short breaks at two units; Osborne Court and Ludlow Road, and it is with regards to the latter that the Trust is primarily responding to and taking the opportunity to clarify and restate our views regarding short break provision.

Proposal 1:

The consultation proposes a number of potential future service re-designs, the first being a "***review of the needs of all families currently accessing overnight unit-based provision to ensure that the needs of carers and children with disabilities are being met in the most appropriate way"***. This is eminently sensible and good practice, as well as a duty towards current and future users of the service and to taxpayers to provide assurance that money is spent wisely. Further, this will help to ensure future sustainability for families in Worcestershire.

Proposal 2:

The more significant change looks to ***"Cease the delivery of overnight provision at Ludlow Road, Kidderminster at the end of the summer term 2018 and provide suitable and alternative provision for existing users. This proposal is based on the consideration of availability of other provision in the north of the county, the need to reduce the number of beds available to four, the potential costs of meeting Ofsted registration requirements and the potential to have more flexible and cost effective provision at Providence Road, which is also located in the north of the county".***

We are concerned that a proposal which ceases provision at the unit is being considered ahead of the work that needs to be undertaken to assess whether this is a viable option or not. A review of all the units ought to be made once the supporting analysis has been undertaken; namely the alternative options have been worked up. This means an informed choice about ceasing and availability of provision, as well as the cost effectiveness, as part of the consultation cannot be made at this stage.

A further point to make is any potential costs of meeting Ofsted registration requirements will be met by the Trust and therefore should be outside this consultation process, and not one of the decision making factors.

Ludlow Road meets the needs of children and young people between 3-18 years that have learning and physical disabilities and a wide range of health needs. Most of the children have profound and multiple learning and physical disabilities and many of the children have complex health needs. As most of the children are vulnerable, due to their restricted mobility and complex health needs, Ludlow Road does not cater for children with challenging behaviour. We are now undertaking an environmental risk assessment

for both Osborne Court and Ludlow Road to further understand the two main issues of capacity and the clinical acuity of the patients on the units. This will help to determine what is possible under current commissioning arrangements to move patients between sites, i.e. those that would normally go to Ludlow Road and the scope for accepting them at Osborne Court.

Care is provided by Registered Nurses (RN's), either Registered Learning Disability or Registered Children's Nurses, and experienced Health Care Assistants (HCA's). Additional training and competency has also been required for the trained nurses to meet the needs of some children with exceptional care needs for example Bipap ventilation and Nasopharyngeal tube care. The other short breaks units within the consultation would not currently be able to care for these children. Examples include:

- **Enteral Feeding** - Over half the children at Ludlow Road are enterally fed, either via a gastrostomy or Nasogastric tube. RN's are responsible for this intervention but can delegate to some HCA's who have also undertaken competency assessments. Care can be unpredictable as tubes may block or become displaced and this may require emergency intervention, for example replacing the device to prevent hospital attendance. This is an invasive procedure that requires specific skill and competence. Delay of the intervention can be traumatic and could result in surgical intervention for some children. Ludlow road is the only short break facility where staff retain competency to repass nasogastric tubes.

- **Complex Epilepsy** - Many children attending Ludlow Road have complex epilepsy and RN's are able to assess the children and administer emergency medication as required. Prompt assessment and intervention may prevent emergency hospital attendance. Access to basic life support and emergency oxygen supply can be administered due to RN presence.

- **Additional Care Needs** - Some children have additional care needs including oral suction, oxygen administration and oxygen saturation monitoring. These interventions are the responsibility of a RN who can only delegate to a HCA following significant training and competency assessment. This training and competency is only valid for an individual child. The assessment and care planning is again, specific to an individual child, and is undertaken by a RN for all children with these care needs.

- **Immobility** - Children are at high risk of complications if they are immobile. This includes the risk of skin pressure ulceration and increased risk of bone fracture. Staff that care for these children require additional training in good skin care and manual handling to protect low density bones and fragile skin.

- **Medication Management** - RN's are responsible for administration of complex medication which requires transcription to ensure administration is safe, and will include the ability to administer simple medication that is not prescribed. Medication is administered via a range of ways which needs a specific competency to be able to do this e.g. Enteral, buccal, injection.

The nursing requirements and training implications as described above will need to be carefully reviewed to ensure staff competencies are appropriate for the clinical care needs of the children and young people before a proposal to cease delivery is progressed.

In addition, in 2013 the Trust undertook some work which looked at short break capacity at both health units and as a result restructured the staffing modelling and shift patterns. We consulted with the families using these services and believe the feedback is still valid and needs to be taken into account. We have included this in the "Stakeholder Feedback" section of this response.

Proposal 3:

The consultation proposes to ***"review the use of Osborne Court unit in Malvern to ensure that the current capacity (including the use of the two bed emergency and assessment bungalow) is used effectively".*** We believe that Osborne Court is already operating to capacity and the figures in the position statement concur with this view in that average occupancy is around 95%. This is based on 5 commissioned beds. However, we are concerned that current resourcing is not adequate and, separate to this consultation, have therefore have already commenced an internal review of this.

Osborne Court (in terms of what is in scope of this consultation) accepts children and young people between 2-18 years, with wide ranging health needs, including challenging behaviours (including those on the Autistic Spectrum), profound and multiple learning and physical disabilities and moderate learning and physical disabilities. The unit capacity is one children's bungalow which houses 6 beds but only 5 of these are commissioned and used for 'routine' short break beds.

The 6th bed is used flexibly as a specialist option for more challenging clients who need individual and exclusive care, for example by children who like to be away from others, and sometimes by children who have a poor sleep pattern, so may cause disruption to others This bed can be used for emergency admissions of children who already use the service, as long as they are compatible with the children who are already there, and additionally by children who may not be known to the service, but where there is a strong indication they will be compatible with the other children. Additional funding must be agreed in advance if additional staff hours are required to open up the 6th bed.

There is a further children's emergency and assessment bungalow which provides 2 beds. This bungalow is used for emergency admissions, but also provides a specialist short break service for those children who display risky behaviours to others, or for those who are not able to cope with noise from others and sharing space. Additional funding must also be agreed in advance for the use of these beds.

Further, we are concerned that the consultation document suggests that the additional capacity at Osborne Court i.e. the 2 emergency beds can be used for more "routine" provision. This would severely impact on the unit's ability to respond to emergency cases and impact on how the main unit is run. The responsiveness and flexibility of the service has been achieved by the use of the 6th bedroom in the main bungalow as and when needed, and by the availability of the separate 2 bedded bungalow to support children and young people with risky and potentially harmful behaviours, away from others. For some children it is appropriate to use this facility from the onset of their referral to Osborne Court and for others, it may become appropriate to use as their needs and behaviours change, often in adolescence, and may only need to be for a temporary period. Occasionally the facility needs to be used during a child's planned stay in the main bungalow when it becomes necessary to be able to support them away

from others. It is a vital facility to be able to support children and young people with risky behaviours effectively.

Proposal 4:

The final proposal looks to ***"increase the capacity at Providence Road, Bromsgrove by the flexible use of one or two additional bedrooms (subject to the necessary changes to the Ofsted registration) as required".*** While the position statement published with the consultation suggests capacity at Providence can be better utilised, we have a number of questions about the occupancy figures and bed costings as outlined in the section below, which means we are unable to support or challenge the proposal at this time.

Position Statement:

Having also reviewed the Position Statement for Current Overnight Short Break Provision which was published as part of the consultation, there are a number of areas we are seeking further clarification and assurance.

- The table below on page 8 of the position statement shows the total amount of agreed overnight provision by month and by year for each unit compared with the current total capacity per year for each unit.

  The "Total Agreed nights per year" figure of 5,900 appears to be wrong and we think should be 5,772.

  It is also unclear as to the rationale /calculation of the numbers as, for example with Osborne Court; the total agreed night appears to be based on 7 beds, but the capacity calculation on 5 beds. This doesn't seem to be comparable and clarification would be helpful.

Unit	Total Agreed nights per month	Total Agreed nights per year	Capacity (per year)
Ludlow Road	99	1188	1040
Providence Road	79	948	1432
Moule Close	88	1056	1436
Osborne Court	215	2580	1815
Total	**481**	**5900**	**5723**

- We would also like to understand how the costs per bed night for Osborne Court have been calculated and if this is based on 5 or 7 beds. If the latter, this would be incorrect as it under values the unit price. For example, the beds in the emergency bungalow can be charged at £543 per night for a child with risky behaviours (using the 2 bed facility on their own) which are billed separately to the main unit costs. Given the figures are based on how the beds are commissioned and funded on a block contract basis regardless of occupancy rates, this does make it difficult to conclude if the units are being operated effectively.

Unit	Cost per bed night
Osborne Court	£229.20
Ludlow Road (based on 4 beds) Ludlow Road (based on 6 beds)	£594.40 £396.00
Moule Close	£294.18
Providence Road	£290.19
Acorns	£850.00/£350.00*
Family Based (standard)	£265.00
Family Based (complex)	£295.00

- Could you also confirm how many beds the unit occupancy for Moule Close is based on? The calculations suggest an average number of 3 beds and occupancy rate of around 79%, however the units has 4 beds which would presumably lower the occupancy rate.

Stakeholder Feedback:

Families

The units provide parents and siblings a vital break from their caring responsibilities and to be able to do activities they may not normally be able to do whilst caring for their child. Whilst a statutory commissioning obligation, it is also a fun experience for the child and gives them an opportunity to make new friends and try different activities. The Trust consulted with families in 2013 and having looked at the current proposals and past feedback believe that many of the concerns and views raised then are still applicable. The rationale for change and the proposed changes are largely the same as in 2013; to save money; to make best use of capacity and offer more service user choice by closing Ludlow and increasing capacity at Providence and possibly Osborne Court.

There was no support to close Ludlow in 2013, staff objected as strongly as parents/carers, and the following objections that were made which we would strongly recommend are taken into account in any final recommendation. These include concerns about:

- Mixing children with behavioural and physical needs; that children with physical health needs could be isolated if beds are in predominantly behavioural units or staff trained to care for children with behavioural needs will not understand the needs of those with physical health care needs
- Social opportunities being minimised for some users if Ludlow Road is closed
- The closure and insufficient service would lead to crisis situations and possible residential care for some children that is more expensive, potential increase in demand on acute services and the loss of specialist staff
- The emotional impact of change on parents and children and the time it takes for children to settle, build rapport; transitions and change are difficult for this group of service users
- Young people aged 15+ and transitioning to a new unit/service, and then again at 18 yrs

- Capacity at Providence and whether there would be enough beds
- Insufficient future proofing of need

Staff

Our staff are also concerned about the proposals and some have chosen to respond individually to this via the online questionnaire. We have met with and collated their feedback on the consultation, the key points of which are:

- Families need more support not less and the concern is that these proposals will result in families being offered less nights
- Skilled nursing care provided in the correct setting would be lost in the north of the county
- Staff at Providence Road are not nurse trained therefore there are cost implications to train or employ nursing staff
- There are safety issues and risks arising from mixing children with behavioural needs with those with health needs
- Trust with families would be compromised for those who will experience a loss of service and trust is hard for these families to build
- Concerns about insufficient capacity at other units and the proposals do not future proof the service
- Osborne Court does not offer an alternative because it is already highly used and has a waiting list. Placing more children there brings challenges around safety and reduces its capacity to offer emergency provision or regular provision for Ludlow children because of the existing demand
- Home based care will not offer a meaningful break for families or children as this is not respite care
- The proposals will recognise short term savings – but will result in more long term costs through the need for crisis interventions, home care, hospital stays and wider reaching implications resulting from family stress.

Process:

There are a number of points we would like to raise with you regarding the consultation process which we believe might leave you exposed to an increase risk of challenge.

We understand the provision of short breaks is a statutory duty of the Council but it is unclear from the proposals how the needs of children with complex physical disabilities, which are currently provided at Ludlow Road, will be met within the other environments. An Equality Impact Assessment on the proposal hasn't been published with the consultation documents and therefore does not allow people to consider and comment on it, which would seemingly not comply with the statutory duty under the Equality Act 2010.

The Act states that in making any decisions and proposals, due regard to the 9 protected characteristics is necessary and without due regard, Court challenge / judicial review is likely. Having looked at the principles in considering 'due regard', there are a number which have not been through this process, e.g. undertaking an equality impact assessment before the consultation process commences and proposals are made.

Section 242 of the NHS Act 2006 outlines the duty to involve both current and prospective service users about potential changes to services. Whilst a consultation process is an effective route to comply with the duty, the obligation occurs at the start of the process. In this instance the process could be vulnerable to legal challenge that a proposal appears to have been made, without undertaking the equality impact assessment, involving current and prospective service users and the wider public.

The consultation provides figures relating to current service users for each site and also those who will be leaving provision due to their age, but does not give any indication of prospective service users going forward and how their needs will be met. Understanding the incidence of the complex and profound disabilities that are currently cared for at the respective sites and the anticipated future flow needs to be considered in relation to future sustainability.

The proposal to close Ludlow Road has been put forward without understanding the personal circumstances and ability to travel of those currently using the service. Families and staff have highlighted concerns about the distance children will have to travel between school and home.

Summary:

While we understand WCC has some difficult choices to make and the financial constraints the system is under, the consultation process lacks certain information which therefore means we are unable to comment on whether the alternatives offer viable provision.

Our priority is to support the families that access and need our services and we welcome the opportunity to discuss the points and concerns raised above and work with you to ensure the proposals are further developed which take these into account.

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Appendix 5
Provision of overnight unit-based short breaks for children with disabilities

Additional formal responses

In addition to the consultation survey, petition and correspondence with families who currently access Ludlow Road, the Council has received five additional formal responses to the consultation on overnight unit-based short breaks. Four of these are from families who have previously or currently access overnight unit-based short breaks. These responses cannot be published as they contain personal information however the collective key points from these responses are below:

- Families highly value the respite they have previously/currently access in terms of giving their family a much needed break from their caring responsibilities, allowing them time to spend with their other children and giving their children enriching life experiences and a sense of independence
- Although there is an understanding that the overnight unit-based short breaks service is expensive, the cost for supporting a family breakdown as a result of less respite would cost more to the Local Authority and have a long-lasting negative affect on the family (not value for money)
- Expectation that the additional costs needed for Osborne Court and Providence Road to meet the needs of those currently accessing Ludlow Road would exceed the amount to keep Ludlow Road open (e.g. cost of staff training, equipment and additional transport)
- Agreement that overall provision should be reviewed in relation to budget and need
- Would like Osborne Court to be used to full capacity
- Transport should be provided for those having to travel from far away to enable families to make the most of their respite
- Osborne Court would be too far away for many children who currently access Ludlow Road to travel
- Providence Road does not have the staff to meet the health needs of the children who currently access Ludlow Road and there would be concerns of mixing these children with the children who currently access Providence Road
- Acorns Children's Hospice is not suitable for all children in terms of travel distance from the north of the County as well as it being a larger setting which stops children from building the necessary rapport with staff
- The closure of Ludlow Road would adversely affect children currently accessing other the other units which families say are already oversubscribed
- Families affected by the consultation have not been adequately communicated with in terms of timing of meetings, clarity of information within letters and not having enough time to respond

The fourth additional response was from Acorns Children's Hospice and was received via a meeting with officers from Acorns and Worcestershire County Council. It was noted that changes to Worcestershire's short breaks services may have an impact on requests for Acorns services. It was agreed that there was a need to look at the respite that families receive from both Worcestershire County Council and Acorns to ensure families receive an equal level of

provision. Acorns also informed the Council that they had started to review children to establish if they still met the health criteria which allow them to be eligible for Acorns services. At the time of the meeting, 16 children in Worcestershire had been identified as no longer meeting the Acorns criteria and would be supported by Acorns to transition from the service. This raised a concern that there may be some families who are having services reduced from Acorns and changed from the Council. Both organisations agreed to work together to manage the impact of this for families.

The final additional response is from Worcestershire Health and Care NHS Trust (WHCT) that is commissioned to deliver overnight short breaks at Osborne Court and Ludlow Road Short Breaks Units. The full response from WHCT is attached as Appendix 4 and the key points are summarised below:

- WHCT agreed to the proposal to review the needs of all families currently accessing overnight unit-based short breaks provision and felt this was good practice and would help to ensure future sustainability for families.
- In regards to the proposal to cease delivery of overnight provision at Ludlow Road, WHCT thought that more work needed to be undertaken to assess whether this was a viable option or not – particularly in terms of whether the alternative options were available and cost effective.
- In regards to the proposal to review the use of Osborne Court to ensure that the current capacity is used effectively, WHCT state that the emergency and assessment bungalow is used for emergency admissions, but also provides a specialist short break service for those children who display risky behaviours to others, or for those who are not able to cope with noise from others and sharing space. WHCT is concerned that if the bungalow is used for more "routine" provision, this would severely impact on the unit's ability to respond to emergency cases and impact on how the main unit is run.
- WHCT state that they are unable to support or challenge the proposal around increasing capacity at Providence Road until information within the Position Statement is clarified

WHCT also supplied feedback from families and staff that was gathered in 2013 during a similar consultation around ceasing the delivery of short breaks at Ludlow Road. This feedback covers the same concerns that have been raised during this consultation.

In summary, WHCT would request that more information is gathered around the alternative options to be able to properly comment on whether or not they are viable options for the families that access Ludlow Road short breaks unit.

Overnight unit-based short breaks consultation
Meeting with families, Artrix Arts Centre, Bromsgrove, 8th March 2018

Present: 8 parent carers, 2 family friends
Councillor Andy Roberts, Cabinet Member with Responsibility for Children and Families
Debbie Herbert, Lead Commissioner for Vulnerable Children and Families
Jennie Leeson and Bethany Wilkinson, Commissioning Officers for Vulnerable Children and Families (note takers)

Andy welcomed everyone to the meeting and provided some information about the political and professional side of this consultation:

- Political: a paper was agreed at a Cabinet meeting in December 2017 to start a consultation about a package of four proposals around overnight unit-based short breaks provision. There have been briefings for councillors and a Scrutiny exercise. This involves a cross party group that has been looking at whether the process has been followed in the proper way, to ensure that the decision is made in the proper way.
- Professional: this was around engaging with families and other stakeholders (providers other professionals etc.) to find out how these proposals would affect families

Andy confirmed that the intention had been for us to go through this consultation process, make a recommendation, meet parents and then make a decision about the proposals. However, during a conversation with some parent carers after a Council meeting in February, Andy was told that families wanted to have a meeting together and have their say before the recommendation report is put together.

Andy explained that what Debbie and other officers are looking for at this point is a solution to enable the proposals to be introduced. We've got limitations in terms of funding but are looking for a sustainable solution that meets the needs of the families that receive support and is the best possible answer.

Below are the questions, comments and discussions that carried out during the meeting:

Consultation process

Letters

Comments:

- It was commented that a lot of parents can't access the internet or don't get letters until late, or can't make phone calls to get information. Another comment was that the letters are too technical and jargonised and that information has not been explained enough.
- A question was asked to confirm whether parents at Osborne Court and Providence Road have been offered 1:1 meetings.

- It was also mentioned that Osborne Court and Providence Road parents only found out about the consultation in February and some parents didn't get letters until after the consultation had closed and then was only given a week to provide a late response.
- There was concern about County Hall post system as parents are getting letters at different time and some details on letters are incorrect (i.e. who they are addressed to)
- There was also a comment about Ludlow Road parents getting told about the consultation over Christmas which is a difficult time for families.

Response:

- It was said that the County Council is trying to make information as accessible as possible and can meet with anyone that wants to. It was confirmed that we've met with everyone that accesses Ludlow Road as it is these families that would be affected the most if the proposals go ahead.
- 1:1 meetings weren't specifically offered to families who access the other units but that all the letters had contact details in for any parents to ask for more information or request this if necessary.
- The County Council can provide copies of the letters that were sent and confirm when they were posted but cannot explain why some letters arrived later than others

About today's meeting

Comment:

- Some parents have had to come from Evesham and this meeting is not suitable in terms of location and time and parents have not been given enough notice to attend the meeting.
- Parents said it was important for all parents to be given the opportunity to voice their concerns and it was even more important when it concerns children with disabilities as they struggle to get their voices heard. Parents expressed that they were the advocates for their children.

Response:

- Bromsgrove is as central as possible for the large county of Worcestershire. The meeting was arranged at the request of parents to have a meeting before the recommendations were made so it was brought forward to allow time for this.

The overall process

Comments:

- There were comments around the fact that Worcestershire County Council was aware in 2015 that the money would be stopped by March 2018 and families should have been consulted with then.
- Comments were made around wanting to trust Worcestershire County Council that there will be provision and needs will be met but don't have that trust because of

the way the consultation has been carried out. It was commented that the process has been "cruel" because there hasn't been enough time to talk to families.

- A parent added to this and said she was here as a representative of all 21 families that access Ludlow Road because they can't attend the meetings. "There are ordinary people at the end of this process and I've had to put everything else on hold because of this." She also echoed that there hasn't been enough time to look at this properly – for Worcestershire County Council or for families.
- Parent asked why Worcestershire County Council would send out letters with proposals to close something without gathering the information about costs first
- Parent asked when the recommendations will be made

Response:

- Andy added that in terms of meetings it was anticipated that Ludlow Road would be the area of biggest concern. So we offered families 1:1 meetings, then parents said they wanted a group meeting so that's why today's meeting was arranged. Andy said he was happy to do a later meeting too but this meeting is what families have asked for.
- Debbie explained that we had initial costs which were presented at Cabinet and the next stage of the process was then to begin a consultation phase to find out more before the recommendations and final decision is made
- It was confirmed that the timing of the recommendations depends on if we agree to enter into a second phase of consultation. Andy confirmed that the decision can't be made until recommendations are made and recommendations can't be made until we've got all of the information.

Information from Worcestershire Health and Care NHS Trust

Comments:

- There was a question about why Worcestershire County Council wouldn't send them a copy of the consultation response from the Worcestershire Health and Care NHS Trust
- Parent commented that they've got a copy of the Worcestershire Health and Care NHS Trust's response and believed that the response agreed with what parents are saying about capacity issues. They asked Andy and Debbie for their take on the Worcestershire Health and Care NHS Trust's response.
- Parents commented that most parents would be happy to have their personal details published and about their children
- There was also a question about the Worcestershire Health and Care NHS Trust not answering the freedom of information request submitted by families regarding a cost breakdown for Ludlow Road and why the information is 'commercially sensitive'.
- There was a comment that staff at Ludlow Road wouldn’t get involved in the consultation to help parents communicate with each other. A question was asked around how Worcestershire County Council can close Ludlow Road if it's owned and run by Worcestershire Health and Care NHS Trust.

Response:

- In regards to the Worcestershire Health and Care NHS Trust consultation response, Debbie said that at the time we were looking at all of the responses and redacting personal information before publishing it all
- Andy confirmed that he hadn't read the Worcestershire Health and Care NHS Trust consultation response in detail as all the responses and information will be presented to him as part of the recommendation report – it wouldn't be appropriate for him to read things in 'real time' as they are sent in as he has to look at things in one go as part of a balanced decision making process
- Debbie confirmed she has read and taken on board the Worcestershire Health and Care NHS Trust comments and is in discussion with them about the points they've made and clarifying the questions they asked around data
- If parents want to share their notes or information about their children they were welcome to do that however the County Council cannot share personal information due to data protection laws
- Families were advised to follow up about the freedom of information request at the meeting with the Worcestershire Health and Care NHS Trust scheduled for 9th March.
- Debbie clarified that Worcestershire Health and Care NHS Trust is Worcestershire County Council's provider. The County Council commission (fund) Worcestershire Health and Care NHS Trust to deliver short breaks provision at Ludlow Road. One of the proposals is for the County Council to no longer fund the provision at Ludlow Road, however it would be the Worcestershire Health and Care NHS Trust's decision what to do with the building.

What should/is happening next?

Second phase of consultation

It was explained that following meetings with families and other feedback received through the consultation, the thought was that we need to look in more detail around the proposal to stop delivering respite at Ludlow Road. One of the options being looked at is going in to a second phase of consultation as the County Council have to find a solution that is acceptable, that meets need and that we can do it in the best and most cost effective way.

Debbie responded to the comments around not having enough time to do the consultation and explained that this is one of the reasons we're looking at going in to a second phase of the consultation. It was also confirmed that the Worcestershire Health and Care NHS Trust can extend its contract and continue delivery short breaks provision at Ludlow Road to allow us to do the second phase of consultation. This would be extended over the summer holidays and until the end of September 2018.

Andy supported this and confirmed that we've heard what families have said about timing, needing more information and the pressure that families are under. This second phase of consultation would allow us to stop and look at whether there are better ways to continue delivering support to families.

Suggestions from families

Comments:

- There was a suggestion that 1:1 sessions should be offered to Osborne Court and Providence Road parents too. This was in addition to speaking to all parents that need any sort of SEND support to see if their needs are currently being met. It was also suggested that the County Council needed to speak to staff at the units and other professionals involved.
- Additional funding sources such as charity grants (Lottery funding, NSPCC etc) were mentioned by parents as ways of keeping Ludlow Road open.
- One idea was discussed around letting Adult services fund beds at Ludlow Road for young adults – this would allow more provision for adults and a smoother transition for young people reaching 18
- A question was asked that if the 2 bed bungalow at Osborne Court wasn't being used effectively then why isn't this closed and Ludlow Road kept open?
- A question was asked whether the County Council is looking at an option to keep Ludlow Road open

Response:

- The County Council is happy to speak to more families and this is something that could be considered
- It was confirmed that Local Authorities can't apply for most of the grants available to charities, as well as the fact that the majority of them provide funding for a short period of time and we needed to provide a long term solution.
- The idea around Adult's services funding beds at Ludlow Road is already being discussed within the County Council but we can't confirm if this is a viable option yet. This could respond to the concerns raised by families around young people accessing Ludlow Road who are close to 18 having to transition to new provision twice. Adult's services have currently just started some engagement work with families around their short breaks provision.
- The County Council confirmed that lots of options have been and can be looked at and any further suggestions or ideas for families or providers are welcomed

Information in the recommendation report

Comments:

- Families confirmed that they want information around the different options for families accessing Ludlow Road and the costs (e.g. to use the extra beds at Providence Road, get any additional staff/training or equipment etc)

- There were lots of questions and comments around whether the other units would have capacity to include families currently accessing Ludlow Road
- Questions were asked around what will happen if the other options are more expensive than keeping Ludlow Road open or there isn't capacity in the other units

Response:

- It was made clear that the recommendation report would include complete financial analysis about how much things will cost and complete capacity calculations in terms of space available at other units. The County Council confirmed it is still working with the Worcestershire Health and Care NHS Trust around the pattern of usage and number of nights that are currently accessed so we can put this forward as part of the recommendation report.
- Andy confirmed that Worcestershire County Council has a statutory legal duty to provide this support so if the proposals don't deliver this then they won't go ahead. The recommendation report will provide information about whether these proposals will meet need and be sustainable to continue meeting need. At the end of the consultation process the Council will be able to say whether or not we can meet the needs of families on a sustainable basis. If it comes back that the needs can't be met then we'd need to look at if the money could be found to continue things the way they are, or in another different way.

The proposals

Can these proposals meet the needs of families?

Comments:

- Parents asked how we could provide what families have now within the proposals.
- Concerns were raised that there will be no flexibility at other units in terms of accessing the unit on different days – because the units will be used by more families
- Concerns were raised about the mix of children at different units
- It was said that the manager at Osborne Court said they hadn't been consultation with around whether they have the space to take Ludlow Road families. Also that we haven't done the costings around whether these proposals can work.
- Families said that there is different information coming from people on the ground at the units and from the officers/councillors running the consultation
- Families were concerned that there is only health provision in Osborne Court and Ludlow Road and not in other units so questioned how health needs could be met
- There were also comments that the bungalow at Osborne Court is already used and that Osborne Court, and other units, already have waiting lists.
- Families were concerned that using the 2 bed emergency bungalow at Osborne Court as a regular respite unit wouldn't meet the social needs of their children.

- Families are concerned about there not being enough or sufficient provision
- Parents were concerned that they could be getting less care at Osborne Court in the future because of the proposal to stop delivering services in Ludlow Road and taking money away from short breaks services.
- Families are worried about how long it is until the same 'closure' happens to Osborne Court or the other centres

Response:

- The detail of each proposal was discussed in more detail and it was confirmed that the needs of all families will still be met.
- It was discussed that the initial calculations showed that these proposals could meet families' needs. The purpose of the consultation was to speak to all the families to find out what would be suitable and appropriate. The work we're doing at the moment is to look at the response from families, look at what children and young people get now and what is available. This is part of the process and we won't go to Andy with the recommendations until we have all of this information, which will be published.
- It was confirmed that managers at all the units work hard to ensure there is the right mix of children accessing the unit at any one time; ensuring they are safe and that their needs are always met
- It was confirmed that we've looked at what is currently delivered in terms of the number of children and the number of nights they currently access, as well as predictions about future demand. A set of proposals was then put together and we went out to families to look at whether families' needs could be met in other ways such as Providence Road or Osborne Court with the right training/staffing/equipment as well. We're now looking at this information as well as gathering more information about costs and the capacity at other units.

About the proposals

Comments:

- There was some confusion about what each of the proposals were and around what the two extra beds at Providence Road are currently used for
- Other questions were around where the money has been cut from
- Alternative options for families was discussed and comments were made around the options to provide Direct Payments to families which is not sustainable for a lot of families
- Using Osborne Court's emergency and assessment bungalow to deliver short breaks was discussed and parents commended that it would be expensive to operate a 2 bed short breaks unit.
- Additional comments were made around the proposals not looking at the other centres and only looking at the medical units (Ludlow Road and Osborne Court) because they cost the most money

Response:

- More information was given about the proposals and families were referred to the consultation document which is available at www.worcestershire.gov.uk/SENDupdates or can be posted/emailed to people on request
- It was confirmed that the funding we're talking about is the Public Health Ring Fenced Grant which is funding direct from the government which has now gone. This means that the County Council has to look at how we can continue to fund the support that is currently delivered with the money that's available within Children's Services.
- It was confirmed that Providence Road has two extra bedrooms that aren't used at all and it's these two bedrooms that the Council is proposing to use. At Osborne Court there is one bedroom in the main unit and two in the emergency and assessment bungalow that aren't funded for full time short breaks so we're having this conversation with the Worcestershire Health and Care NHS Trust about how these could be used more effectively.
- The four proposals were explained in more detail to clarify that we could be reviewing the needs of all families accessing overnight unit-based short breaks so clarified that the consultation was not just around health-run provision (Ludlow Road and Osborne Court). It was also discussed about the proposal around using the two extra beds at Providence Road.

Other questions and concerns

- There was a lot of discussion about the value of the provision that families currently access and how difficult it is for families to cope on a day to day basis
- There was a suggestion that County Councillors and/or officers making these decisions should spend a day with families to experience the difficulties faced each day
- Families said how comfortable they are with the provision they access at the moment. It was mentioned that the first proposal to review the needs of all families is only a red herring as needs are already being met.
- It was asked why the County Council is taking money away from children with disabilities as they're the most vulnerable.
- There was another comment to say that MPs got a pay rise this week yet children's services get cut
- Parents want to know facts and specifics around where the beds are going to come from.
- Parents said all they want is more choice to make the right decisions for their children.

Summary points

Andy summarised that the points that had come through during the meeting are that there's a fear that after this consultation process there won't be sufficient and appropriate respite provision for families. He said that in previous meetings the emphasis had been on the transition to new provision. Families confirmed transition was still a concern.

Debbie confirmed that these issues came across in the meetings with families and all these points will be shared in the recommendation report. This will also include information about the costs and what provision is available at the other units.

Debbie asked the question of the group as there were conflicting comments around wanting a decision to be made quickly and wanting more time to talk to families and gather more information. The options were:

1) Have a second phase of consultation in April/May
2) Continue with the current process and make a recommendation and decision on the current proposals

The response from the parents in the room is for Worcestershire County Council to get the information and figures together to understand if the proposals could actually work. They could then like the County Council to speak to parents again about what they think.

There was agreement to the extra consultation time if it meant that the County Council could come up with some new solutions to continue to meet the needs of families. However if, after the extra time, the same proposals are made then parents would rather have the decision made now.

It was added that if the County Council can come up with a solution to offer everyone the same support they get at the moment and it can be met at other units then that's fine. Families said they have had to fight for what they've got and what they do receive is just about enough so it can't be shaved off anymore.

Solution and outcome from today's meeting:

The County Council agrees to:

- Present the options and hard facts around costs and capacity in terms of if there are solutions for families and the options are sustainable
- Provide the time for these options and facts to be challenged by families and other stakeholders

Andy confirmed that he understands that this is a difficult time for parents but respectfully said that whatever the County Council did or suggested would be wrong and understandably every parent thinks their child is the most important. He stated that councillors and officers are doing their best with the money and time they've got and to ask families to work with us by providing information, ideas and allowing us the time to do this. Debbie agreed to this and said we would present honest, open facts and families confirmed that's all they ask for.

Andy closed the meeting to say that the Council's aim is to come up with a solution that's appropriate and viable for everyone involved.

8th February 2018

LUDLOW ROAD SHORT BREAKS CENTRE – PARENTS' LETTER

Worcestershire County Council – Parents Consultation Response

Further to the notification that Ludlow Road Short Breaks Centre is due to close, some of the parents have written a short statement to try and explain the impact it will have on them and their families. I've been gathering this information over the past few days, and I have found it particularly emotional to read some of their stories. We would be grateful if you could circulate this letter to all the people who are involved and voting on the Ludlow Road closure, we need them to know that their decisions will have a huge and lasting impact on lots of vulnerable families and their children.

Yours Faithfully,

Mom and Dad:

To me and my family Ludlow Road is not a service, it has been part of our lives for 14 years and as such we class that little bungalow as part of our family, my son has known nothing else outside his family to love and care for him like the staff do there. This is morally wrong and I will fight to keep Ludlow Road open.

Mom:

As a family, we are relatively new to overnight respite having only done a year and it's been a life line. It took almost 6 months to settle in. Having experienced a support worker we now know the overnight respite is the only solution that really gives us a break as a family. is happy and settled at Ludlow Road, he has friends there and is well looked after in a home from home loving environment .You are putting immense strain on us and without having a disabled child yourself, you have no idea how hard it is to just get up in the mornings, knowing what your day will be like and the preparation it takes just to get out of the house, or to have the energy to get through the day with a child wanting and needing such attention along with trying to keep your other child happy. However, you can feel it is appropriate to close the only little ray of light we get to re charge our batteries and carry on ....you should be ashamed.

Mom:

Ludlow Road means the world to and our family, she is happy, safe, and around friends. I'm at the point now I trust the Ludlow Road team like a family and can rest easy knowing she is in the very best appropriate care with similar children around her. The idea that Ludlow Road could close has placed considerable stress upon us especially as is 16 and we will face respite transition this year and again next year as she reaches 18. This prospect for a child that cannot speak, walk or genuinely understand change, causes us massive concern. These most vulnerable

group of children have been targeted in our community with no solid financial evidence. We urge you to reconsider this suggestion, you've placed children, parents and families in a most hideous limbo.

Mom:

Having a child with special/additional needs puts an extreme amount of pressure on families and their relationships. My youngest daughter has many conditions affecting her in many different ways, putting additional pressure on our marriage. Our eldest daughter now has to have counselling to support her in dealing with everything she has seen and has to deal with. When your child has additional needs it is very difficult to balance your time, and Ludlow Road provides this invaluable chance. These moments are taken to spend quality time with your other children and on your marriage. However, it is not easy to leave your child with just anyone, the staff at Ludlow Road have an amazing ability to treat ' not only as an individual but also like she was their own. This means the rest of the family can cherish this time knowing your child is surrounded by amazing care, love and support. Ludlow Road supports and loves some of the most vulnerable and it seems a cheap shot to target these children without a voice.

- Mom:

' has had respite at Ludlow Road for the past seven years. The care he receives is outstanding and it has taken years to build up this level of trust. ' has night seizures and is regularly awake from 3am. Ludlow Road enables us to spend quality time with our teenage daughter and to catch up on sleep. Caring for a disabled child is completely emotionally and physically exhausting. This whole process of consultation is extremely stressful and puts additional unnecessary pressure on families.

- Mom:

I am a mother of two children with life limiting conditions which has rendered them severely disabled. This places enormous and exhausting strain on our normal life. ' is 11 and has been going to Ludlow Road since she was 3 years old. Ludlow Road has provided us as a family, a much needed break, and has provided ' with the opportunity to mix with other children in a sociable setting. It has taken years for to get to know her surroundings and the people who care for her, by closing Ludlow Road this removes all of these positive things within her life. It would then take considerable time for ' to settle in another unit and she would lose all the staff and friends she has come to know and love. Add in to this the struggle as a parent allowing your child to stay somewhere else and trust the people around her to care for her every need like we, as her family, do. Being non-verbal means it takes time to get to know ' ; likes, dislikes and her routines. Children like my daughter are unable to do many things other children can do, Ludlow Road provides her with a sense of normality as for ' going there with her friends is like having a sleep over. I hope those making the decision understand the severity of the impact closing Ludlow Road will have on ' who has already suffer enough.

's Mom:

At 5 months old was diagnosed with Cerebral Palsy. We would be lost without Ludlow Road, we went on to have three more boys who love Ludlow Road too. It gives us time with them and we know is safe and cared for. has made lots of friends there who he interacts with, Ludlow Road is our life line.

Mom:

is 8 years old and has been going to Ludlow Road for nearly 4 years, she has cerebral palsy, epilepsy and global delay, we wouldn't know what to do without Ludlow Road. has huge separation issues and hates to leave me, but the staff at Ludlow Road have worked so hard with her and now she loves going there and seeing her friends. 18 months ago had a seizure under anaesthetic and it took what little function she did have, away. was no longer able to crawl, sign, eat or drink and this in turn has made her frustrated as she is now confined to her chair and is tube fed. The staff took all this in their stride and adapted to new needs. I trust no one else with my daughter and fear that would not cope if she had to move to another unit. We need Ludlow Road.

Mom:

My daughter has been going to Ludlow road for approximately 8 years. suffers from quadriplegic cerebella palsy, seizures which have stopped her breathing and brittle bones. She is non-verbal and needs 24 hr one to one care. is an extremely vulnerable 16 year old who loves people and has a very naughty sense of humour! At Ludlow Road she gets to have sleep over parties with her friends, as any other 16 year old would. Unfortunately, vulnerable children come as a package with their very vulnerable families, who have been by their amazing and inspirational children's side, step by metaphorical step. is a surviving twin, our daughter died at 9 days old, having to bury a child is the most devastating and soul destroying thing a parent can ever do, once this has happened, the trust you need to summon to entrust your surviving, precious child into the care of others is immeasurable. The staff at Ludlow Road have allowed this through their patience, love and understanding. We see the staff at Ludlow Road as our extended family as well as friends and we are so grateful that they have been there for us over the years with all their love empty and support, we quite honestly would be lost without them.

Mom:

Up until was 10 year old I looked after her myself at home, I didn't have or wanted any outside support. When I was first offered respite, I was horrified at the thought of handing my daughter over to complete strangers but Ludlow Road nurtured myself and my family to help us let go and to trust them, we didn't want it but we knew it was getting too difficult to look after her without help. They showed us love, kindness, patients and professionalism and most of all gave a home from home, all within the safety of an NHS run establishment. I didn't want to use a foster carers home, mainly because you can't DBS check everyone who pops in for a cup of tea, so I feel there can be real safely issues with children, and this to me was an horrific idea.

I had no choice in the path my daughter has taken me on, my responsibilities for her are there until I die. My daughter is the most vulnerable in society and only has her parents to protect her, but with the support of trusted nursing respite I am able to take those few short hours to try and rest and pick myself to start the day again. I am so upset and I feel vulnerable and scared for the future and I feeling that I am unable to help and protect her from changes that she can't understand.

We are asking you to help us and protect our children for the future, life is hard enough and it's a life you could have no idea of the relentless struggle we have every single day.

Rest assured there will be other parents as I write this that will be going through all the pain and despair you feel in those early days, that you are not getting the healthy child you thought you were.

will never become independent, it's a great strain on trying to balance the needs of family life, two other children, a marriage and still be a full time carer. I didn't choose this path or train for any of it .

The trust me and my family have built up in the staff of Ludlow Road has taken us years. My daughter has no voice to let us know if she is unhappy or in pain, that is all guess work, there are only subtle changes that only a person who knows well, would be able to spot.

It has taken me years to not telephone Ludlow Road to check is OK when she stays and also to relax on that very valuable respite night.

is fourteen years old, 5ft 3' and still growing. She has the mental age of a ten month old baby, she cannot walk, talk or feed herself and she wears nappies, and has just started her periods, she cannot function without someone looking after her 24 hrs a day. She runs the risk of choking with possible epileptic fits in the night. She is now taller than me and needs two people to deal with her. The closure will hurt us more than you realise, it is going to take us a long time to rebuild the trust that we have in the Ludlow Road staff. We are hanging on by our finger tips and as the years go by, we're not getting any younger. I am now 54 and my mother, who has tried to help me in the past, is now in her late 70's. We know we are going to need more respite in the future, and we are terrified that we won't be able to get the kind of care that needs, with careers we can trust for the rest of her life. I need you to know that if any of my friends read this statement, they would be totally shocked. We have always been a very proud and private family and done our utmost not to burden anyone else with our problems. However, as you can appreciate we have tried to deal with this situation ourselves are now at the stage we cannot manage on our own any longer and we need help.

Worcestershire Health and Care NHS Trust

Income & Expenditure for Ludlow Road and Osborne Court

Ludlow Road				Osborne Court				Combined Ludlow & Osborne Court			
	Contract Income	**Activity**	**Bed price**		**Contract Income**	**Activity**	**Bed price**		**Contract Income**	**Activity**	**Bed price**
Income	£ 624,215	1,189	**£ 524.99**	Income	£ 351,422	1,529	**£ 229.84**	Income	£ 975,637	2,718	**£ 358.95**
Expenditure				**Expenditure**				**Expenditure**			
Direct Costs	**£**			**Direct Costs**	**£**			**Direct Costs**			
Direct Pay	£ 361,484			Direct Pay	£ 450,267			Direct Pay	£ 811,751		
Medics - no medical input	£ -			Medics - no medical input	£ -			Medics - no medical input	£ -		
Non Pay	£ 9,170			Non Pay	£ 17,264			Non Pay	£ 26,434		
Utilities	£ 8,266			Utilities	£ 12,774			Utilities	£ 21,040		
Total direct costs	**£ 378,920**	83%		**Total direct costs**	**£ 480,305**	82%		**Total direct costs**	**£ 859,225**	82%	
Indirect Costs				**Indirect Costs**				**Indirect Costs**			
Capital charges	£ 12,050			Capital charges	£ 38,160			Capital charges	£ 50,210		
Maint/Grounds&Gardens/Waste	£ 28,743			Maint/Grounds&Gardens/Waste	£ 24,003			Maint/Grounds&Gardens/Waste	£ 52,746		
Cleaning costs	£ 14,865			Cleaning costs	£ 14,594			Cleaning costs	£ 29,459		
Laundry & Linen costs	£ 1,000			Laundry & Linen costs	£ 1,873			Laundry & Linen costs	£ 2,873		
CNST costs	£ 1,058			CNST costs	£ 1,508			CNST costs	£ 2,567		
Total indirect costs	**£ 57,716**	13%		**Total indirect costs**	**£ 80,138**	14%		**Total indirect costs**	**£ 137,855**	13%	
Corporate Overheads	**£ 21,832**	5%		**Corporate Overheads**	**£ 28,022**	5%		**Corporate Overheads**	**£ 49,854**	5%	
Total Costs	**£ 458,468**		**£ 385.59**	**Total Costs**	**£ 588,465**		**£ 384.87**	**Total Costs**	**£ 1,046,934**		**£ 385.19**
								Out of County NCA income	**£ 39,000**		
Net surplus/(loss)	**£ 165,747**			**Net surplus/(loss)**	**(237,043)**			**Net surplus/(loss)**	**(32,297)**		

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WORCESTERSHIRE COUNTY COUNCIL EQUALITY IMPACT ASSESSMENT TEMPLATE

Please read the brief guidance which provides essential information for anyone who is unfamiliar with the County Council Equality Impact Assessment process.

Background information:

Name:	Debbie Herbert
Job Title:	Lead Commissioner – Vulnerable Children and Families
Service area:	Early Help and Commissioning
Directorate:	CF&C
Telephone:	01905 846831
Email address:	Dherbert2@worcestershire.gov.uk
Date assessment commenced:	19/04/2018
Date assessment completed:	14/06/2018

Function, strategy, project, policy or procedure being assessed:

Name of the function, strategy, project, policy or procedure being assessed:	This Equality Impact Assessment relates to the recommendations in the Cabinet report (12th July 2018) on a set of proposals for the redesign of the provision of overnight unit based short breaks for children with disabilities. A consultation on the proposals has been completed (January to April 2018) and as a result the original proposals have been revised, following the receipt of feedback from families and professionals, and the receipt of additional financial information from the Worcestershire Health and Care NHS Trust (WHCT). Overnight short breaks are provided at 4 units in the county by both the Council and WHCT. A pre-consultation review of the provision took account of: • Current capacity of the units • Current assessed need of families accessing the provision • Suitability of the accommodation and facilities • The potential to deliver additional capacity at each unit and/or to spot purchase provision • The average cost of an overnight stay at each provision • Geographical spread of provision and families • The potential to meet needs through 1:1 support and/or overnight family based provision The future service re-design proposals are outlined in full in the Cabinet report (link to 14th December 17 report) but can be summarised as: 1. Review the needs of all families accessing overnight units to ensure that the needs of carers and children with disabilities are met in the most appropriate way

	2. Cease the funding of delivery of short breaks at the Ludlow Road unit in Kidderminster 3. Increase of provision at Providence Road unit in Bromsgrove by the flexible use of one or two additional bedrooms 4. Review of the use of Osborne Court in Malvern to ensure that the current capacity is used effectively. The report to Cabinet (link to July 18 report), of which this EIA forms part, contains a revised set of recommendations which take account of the feedback received and additional financial information now available. **This EIA is in relation to the recommendations in the July 2018 Cabinet report and not the original set of proposals.**
Is this a new or an amended policy?	Amended
Does the policy form part of a wider programme which has already been screened for equality relevance?	No

Stage 1 - Please summarise the main objectives, aims and intended outcomes of this policy

Aims/Objectives:	The aim of this work is to ensure a sustainable, long term approach to the provision of overnight unit based short breaks for children with disabilities.
Intended outcomes:	The intended outcomes are: (1) Provision that is financially sustainable and meets the assessed needs of children with disabilities and their families (2) Choice and flexibility for families in the longer term including provision that can be accessed using personalised budgets and direct payments (3) Provision that supports the transition to adulthood for young people with disabilities
Please summarise how these outcomes will be achieved?	The recommendations to Cabinet support the development of robust contractual arrangements, the development of a wider set of provision by engagement with the provider market, co-production of future service delivery, particularly in relation to transition arrangements, and increased flexibility and choice over time.
Where an existing policy is to be amended please summarise principle differences between the existing and proposed policies?	

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Stage 2 - Information gathering/consultation

Please give details of data and research which you will use when carrying out this assessment:	The data and research used in this assessment is contained in the Cabinet reports of 14th December 2017 and 12th July 2018 including the Position Statement on current provision attached as appendix to the December report and the results of the consultation process and further research contained in the July report, together with the findings of the Scrutiny Task Group report on the consultation.
Please give details of any consultation findings you will use when carrying out this assessment:	Details of the responses to the consultation process are contained in full within the July 2018 Cabinet report. In summary responses were received to the consultation via: • On-line survey • 1:1 meetings with all families currently accessing Ludlow Road unit • Family meeting with Councillor Roberts • Petition (on-line and paper) • Formal responses received directly from families and organisations
Do you consider these sources to be sufficient?	Yes
If this data is insufficient, please give details of further research/consultation you will carry out:	Recommendations in the report relate to clarity of contractual arrangements and to the views of families
Please summarise relevant findings from your research/consultation:	Key findings from the consultation include: • concerns about the impact of a change of provision (for those accessing Ludlow Road), particularly for young people approaching 18 and a possible move to adult provision;. • questions and concerns as to the cost, capacity and flexibility of the proposed provision and whether any savings would result from the proposed changes;. • questions and concerns as to whether units run by the Council could meet the health needs of children and young people currently accessing NHS (Worcestershire Health and Care Trust) run provision;. • overall support for the proposal to assess the needs of families;. • opposition to the proposal to cease funding for

	Ludlow Road and concerns about the possible impact on families accessing other units and . • concerns as to whether reviewing the provision at Osborne Court would lead to a loss of flexibility and/or emergency provision. Recommendations in the Cabinet report have been formulated in response to these concerns and include: (insert here when finalised)

Stage 3 - Assessing the equality impact of the policy

Based on your findings, please indicate using the table below whether the policy could have an adverse, neutral or positive impact for any of the protected groups:

Protected characteristic	Adverse	Positive	Neutral
Age	☑	☑	☐
Disability	☑	☑	☐
Gender reassignment	☐	☐	☑
Marriage and civil partnership	☐	☐	☑
Pregnancy and maternity	☐	☐	☑
Race	☐	☐	☑
Religion and belief	☐	☐	☑
Sex	☐	☐	☑
Sexual orientation	☐	☐	☑

Please provide details of all positive and adverse impact you have identified:	Positive and negative impacts have been identified from the consultation findings in relation to the original proposals, however it is felt that the foreseen negative impact of the proposal in relation to Ludlow Road is mitigated by the recoemndations in the Cabinet report. The recommendations (as opposed to the original proposals) have at this time a neutral impact for most and the potential for a positive impact for families wishing to access the Providence Road unit.
Where possible please include numbers likely to be affected:	A relatively small number of families access the units included in these proposals (no to be included for all units)
Where potential adverse impact has been identified, can continuation of the proposed	Yes If yes, please explain your reasons: As stated above the

policy be justified?	responses to the consultation have resulted in recommendations that seek to respond to the findings and additional information provided during the process.
Do you consider that this policy will contribute to the achievement of the three aims of the Public Sector Equality Duty?	Yes, in respect of equality of opportunity, the aims of this service redesign are that choice and flexibility of provision can be increased. There may also be some negative impact as services transform but these changes would be subject to further consultation and impact assessment.
The Public Sector Equality Duty has the following three aims: 1. To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010. 2. To advance equality of opportunity between persons who share a relevant Protected Characteristic and persons who do not share it. 3. To foster good relations between persons who share a relevant Protected Characteristic and persons who do not share it.	

Stage 4 - Action planning and time frames

Please list any actions you will take to mitigate any adverse impact you have identified:

Planned action	By who	By when	How will this be monitored

Please indicate how these actions will be taken forward as part of your team/service/directorate planning:	The recommendations within the Cabinet report (July 18), if agreed, will be taken forward as part of the work plan of the Early Help and Commissioning service together with colleagues in Children's Social Care and Adult Services.

Stage 5 - Monitoring & Review

How frequently will proposed action be monitored?	This forms part of the commissioning process
How frequently will intended outcomes be evaluated?	This forms part of the commissioning process
Who will be responsible for monitoring and evaluation?	This forms part of the commissioning process
How will you use the monitoring and evaluation results?	This forms part of the commissioning process

Stage 6 - Publication

Worcestershire County Council requires all assessments to be published on our website. Please send a copy of this assessment to the Corporate Equality and Diversity Team for publication.

	Signature	Date
Completing Officer:	**Debbie Herbert**	14/06/2018
Lead Officer:		Click here to enter a date.
Service Manager:	**Sarah Wilkins**	Click here to enter a date.

Appendix 10: Social Work Assessments

Social Work assessments focus on the needs of the child including particular vulnerabilities including communicating method, and parenting capacity to meet the child's identified needs. Assessments look at the current support provision, including the length of time away from the home, and how it is meeting need and are an effective way of promoting the welfare of and safeguarding children. The assessment will include the views of parents and carers and with children and young people to identify how the current provision is experienced, including observation of the child during or immediately after a short break. The assessment will also encompass the views of all professionals involved in the child's life to give a holistic view of the child's needs. Social work assessments concentrate on social care needs but will include consultation with health professionals such as GPs, school nurses, health visitors, CAMHS etc and education professionals (including teaching staff, Personal Assistant's and/or the SEND team).

The assessment will include a visit to the child at home and it is good practice to visit the child in different environments to gain a holistic view of how the child's experience of different environments and the impact of this on them, including any short break provision outside the family home as detailed above.

An assessment is reviewed on an annual basis to review the support package and the needs of the child. If a significant event occurs a Social Work Assessment should be completed at the time of the significant event and not wait for the annual review period. A social work assessment is also required if there is a significant change in the support package to ensure the identified need is fully assessed and a rational for the change. There are occasions when a family will require a change in support on an emergency basis for a short /temporary period of time. This will include, for example, hospitalisation of a child for an operation who needs extra support following discharge with consultation with social care and health to identify the health need and social care need or a parent becomes unwell and requires emergency provision to support their child on a short term basis. This type of change does not require an assessment unless it is felt necessary due to the change being long term.

Short break provision, where provided, will form part of an Education, Health and Care Plan therefore an annual review of the short break package is needed to feed into the annual EHCP review process.

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Appendix 11 Analysis in relation to Consultation Proposal 2 – ceasing the delivery of provision at Ludlow Road, Kidderminster

Assessment of additional capacity requirements, based on the redesign proposal to cease provision at Ludlow Road.

1. This section of the report considers the additional capacity that would be needed elsewhere if the proposal to cease funding of delivery at Ludlow Road were implemented.

2. The calculations below are based on two scenarios:

(1) the maximum number of children/young people who may access Providence Road as their alternative accommodation which following feedback and analysis of need is considered to be a suitable alternative and;

(2) the maximum number of children/young people who may access Osborne Court as their alternative which following feedback and analysis of need is considered to be a suitable alternative.

The two scenarios reflect the fact that for some families there is more than one suitable alternative which has been considered.

Additional capacity required scenario (1)

Unit	No. of CYP	Total no. nights per month (based on assessed need)	Total no. week day nights per month	Total no. weekend nights per month
Providence road	**13**	**57**	**35**	**22**
Osborne Court	**3**	**17**	**9**	**8**
Other (non-unit based)	**3**	**8**	**3**	**5**
Total	**19**	**82**	**47**	**35**

Additional capacity required scenario (2)

Unit	No. of CYP	Total no. nights per month (based on assessed need)	Total no. week day nights per month	Total no. weekend nights per month
Providence road	**8**	**32**	**19**	**13**
Osborne Court	**4**	**24**	**13**	**11**
Other (non unit based)	**7**	**26**	**15**	**11**
Total	**19**	**82**	**47**	**35**

3. The additional capacity at Providence Road which would be available from the use of the additional two bedrooms/beds (proposal 3) is:

	Nights per month	Weekday nights (Mon – Thurs)	W'end nights (Fri – Sun)
Total capacity available (based on 2 extra beds in 31 day month)	**62**	**38**	**24**
Total capacity available (based on 2 extra beds in 28 day month)	**56**	**32**	**24**

4. From the above it can be seen that between 1 and 2 additional beds are required at Providence Road to meet potential need but may not both be needed 7 nights a week.

5. The additional capacity at Osborne Court which would be available from the use of one additional bedroom in the main unit or bungalow is:

	Nights per month	Weekday nights (Mon – Thurs)	W'end nights (Fri – Sun)
Total capacity available (based on 1 extra bed in 31 day month)	**31**	**19**	**12**
Total capacity available (based on 1 extra bed in 28 day month)	**28**	**16**	**12**

6. From the above it can be seen that 1 additional bed is required at Osborne Court to meet potential need but also may not be needed 7 nights a week.

Likely impact on travel distances of using suitable alternative respite provision

7. Consideration of the impact of a change of unit for families has included an analysis of the impact of this proposal on travel for children and families using Ludlow Road. Children travel from and to units from home and school via home to school transport or in family vehicles.

The likely impact on travel distance for 16 families is indicated below:

No of CYP	Impact
11	The distance from unit to both home and school is reduced
3	The distance to school is reduced but the distance to home is increased
2	The distance from unit to both school and home is increased

8. This information indicates that not all children and young people are currently accessing the unit that can meet their needs and that is closest to both their home and school.

9. This indicates that a review of the current referral and identification of suitable provision process to further take into account where possible children accessing respite nearer to home and school may benefit both parent carers and children and young people.

10. It has not been possible to assess the likely impact of travel distance for 3 children currently accessing Ludlow Road, with any certainty, due to the options that are available and the ongoing assessment of the families' needs.

11. It should also be noted that the Worcestershire Health and Care NHS Trust has applied to register the unit at Ludlow Road as a Children's home. The timetable for registration indicates that this should be complete by the autumn, depending on requirements for registration. The impact of this on the future operating model of the unit and its maximum capacity are not yet known.

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Appendix 12 Additional relevant information relating to demand and provision

1. The table below includes the following data:

- Number of Children and Young People accessing overnight unit based short breaks for the first time in the years 2015 to 2017 and the total number of nights agreed ie 'assessed need' per month
- Number of Children and Young People with an increase in their assessed need (additional nights) during the years 2015 to 2017 and the total number of additional nights per month
- The number of CYP currently accessing unit based short breaks who will reach 18 in the years 2018 to 2020 and cease to access provision

Trends in demand for Overnight short break respite care and those in service reaching 18 in the next three years (all units)

	Number of CYP accessing provision for the first time	**Total number of nights (assessed need) per month**	**Number of CYP with assessed need for additional nights**	**Total number of additional nights (assessed need) per month**	**Total number of CYP reaching 18 during the year**	**Total number of nights per month accessed by those reaching 18**
2015	19	38	7	10		
2016	28	62	13	19		
2017	25	57	9	11		
2018					7	23
2019					17	54
2020					15	45
Average	24	52	10	13	13	41

2. CYP may stop accessing overnight unit based provision for reasons other than their age but this cannot be predicted.

3. 'Demand' for overnight unit based short break provision will also be affected by other factors which are outlined below:

Changes implemented to increase choice in short breaks provision based on feedback from families which are likely to reduce demand for unit based overnight provision:

- Additional capacity is now available in the family based overnight service as new host families have been recruited by the provider
- Re-commissioned 1:1 support service providing greater capacity and flexibility to this service (in place 1st April 2018)
- The re-commissioning of community and school based provision to ensure county wide coverage, clarity on access criteria and better choice of provision (in place by October 2018)

- increase in the use of personalised budgets resulting in direct payments together with the development of the market (increase in choice and range of provision) provides opportunity for increased choice in short break provision

Factors which may increase demand for short breaks provision generally and therefore increase demand for unit based respite provision:

- Children and young people moving into the County including children who no longer attend out of county residential provision
- The availability of short break provision at Acorns' Hospice in Worcester has been taken into account in the review of unit-based provision. This provision is CCG grant funded as part of palliative health care provision and accessed by families following referral from a health professional as part of the overall hospice offer to children with life limiting or life threatening conditions. Where there is an assessed need, additional nights can also be funded by the Council to meet the needs of children requiring a high level of care, and their carers. During the consultation the Council and CCG were advised of a change of referral pathways into Acorns Hospice and a review of eligibility that has resulted in a number of families being advised that they can no longer access overnight respite directly from Acorns. The impact of these changes could, subject to assessment, lead to an increase in demand for unit based overnight short breaks.

4. In summary, the future prediction of the number of children who are likely to need unit based overnight short breaks provision is complex. The total number of children and young people accessing provision is small, as a percentage both of children and young people with SEND and the population as a whole. Changes in the prevention, diagnosis and treatment of conditions as well as the factors that impact on the prevalence of conditions will lead to changes in demand. Whilst the feedback on the value and importance of the care provided by the overnight units is acknowledged, social care practice such as a move to personalisation of care and the use of direct payments and increased parental choice.

Comparison of Worcestershire overnight unit based respite provision with other counties

5. For the purposes of comparison, the table below shows overnight short break provision relative to the 0-18 population in a number of neighbouring counties in a way that is statistically comparable in relation to prevalence of disability. This suggests that relative to the 0-18 population the current number of beds and units are highest in Worcestershire. However due to differences in commissioning arrangements this information should be treated as being indicative only of relative provision.

	0-18 population	**beds**	**beds per 100,000 0-18s**	**Respite units**	**units per 100,000 0-18s**
Worcestershire	122,823	19	15.5	4	3.3
Herefordshire[1]	38,073	-	-	1	2.6
Shropshire	63,112	8	12.7	2	3.2

Warwickshire[2]	119,698	11	9.2	2	1.7
Gloucestershire	133,644	6	4.5	1	0.7
Oxfordshire	150,951	11	7.3	2	1.3

ONS mid-2016 population estimates

1. Comparable data is not available for Herefordshre
2. Warwickshire also spot purchase overnight respite from several additional units which is not included in this data set

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MINERALS AND WASTE
LOCAL DEVELOPMENT SCHEME

Worcestershire County Council
July 2018

This scheme has been prepared in compliance with the Planning & Compulsory Act 2004 as amended and the Town and Country Planning (Local Planning) (England) Regulations 2012

worcestershire
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Contents

1. Purpose of the Minerals and Waste Local Development Scheme

1.1. The County Council is the Minerals and Waste Planning Authority for Worcestershire and is responsible for all minerals and waste planning matters in the county.

1.2. The Minerals and Waste Development Scheme (MWDS or LDS) sets out the Council's priorities for producing planning policy documents over the coming three year period. It is a requirement of the Planning and Compulsory Purchase Act 2004 (as amended) that each Local Planning Authority should produce an LDS, which must include any Development Plan Documents it intends to publish, their area of coverage, subject matter and a timetable indicating the main milestones of production and revision.

1.3. The LDS is updated periodically to reflect changes to timetables to ensure it provides a useful source of information for interested parties and meets the requirements of the aforementioned Act. There are four main intentions of this revised LDS:

- to report the progress made since the publication of the previous LDS;
- to inform interested parties of the changed timetable for the consultation, examination process and adoption of the Worcestershire Minerals Local Plan;
- to provide a schedule and reasons for producing a separate Minerals Site Allocations Development Plan Document; and
- to provide a schedule for the early stages of the anticipated need for review and revision of the Waste Core Strategy for Worcestershire.

1.4. The revised schedule presented in this Local Development Scheme came into effect in July 2018, in line with the resolution of the Worcestershire County Council Cabinet on 12th July 2018. It covers the period July 2018 – June 2021 and replaces the previous LDS dated July 2017.

1.5. The Local Development Scheme is available on the Worcestershire County Council website at: www.worcestershire.gov.uk/lds . A printed copy is also available on request or to view at County Hall Reception, Spetchley Road, Worcester WR5 2NP.

1.6. If you have any questions about the LDS or how to access it, please contact us by e-mail: minerals@worcestershire.gov.uk or wcs@worcestershire.gov.uk or telephone 01905 766374.

2. The Development Plan in Worcestershire

1.7. The Development Plan for Worcestershire currently consists of the documents set out in Table 1:

Table 1. The Development Plan for Worcestershire

Development Plan Document	Detail
"Saved" policies in the **County of Hereford and Worcester Minerals Local Plan**.	Five policies in the adopted County of Hereford and Worcester Minerals Local Plan were "saved" by The Secretary of State for Communities and Local Government in exercise of the power conferred by paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004 in a direction later dated 7 September 2007. The "saved" policies will remain part of the Development Plan until superseded but the weight given to them in decision making will depend upon their conformity with national planning policy.
Waste Core Strategy for Worcestershire: Adopted Waste Local Plan 2012 – 2027, adopted November 2012	The Worcestershire Waste Core Strategy Local Plan sets out how the County plans for waste management facilities in Worcestershire.

The **Local Plans** and **Development Plan Documents** produced by the six City, Borough and District Planning Authorities in Worcestershire.
 	
At 12th July 2018, these are:
 	
• **The Bromsgrove District Plan 2011-2030** adopted January 2017
  ○ **Longbridge Area Action Plan** adopted April 2009
• **The Borough of Redditch Local Plan No 4 (2011 – 2030)** adopted January 2017
• **Wyre Forest Core Strategy** adopted December 2010
  ○ **Wyre Forest Site Allocations and Policies Local Plan** adopted July 2013
  ○ **Kidderminster Central Area Action Plan** adopted July 2013
• **The South Worcestershire Development Plan** adopted February 2016.
	Emerging DPDs:
	
	• **South Worcestershire Traveller and Travelling Showpeople - Site Allocations Development Plan Document** (Regulation 19 consultation due to take place during 2018)
	• **Wyre Forest Local Plan Review (2016-2034)** - The new Local Plan will replace the current Adopted Core Strategy, Site Allocations and Policies Local Plan and Kidderminster Central Area Action Plan. (Regulation 19 consultation due to take place during 2018)

3. Progress made since the previous LDS and reasons for review

1.8. Progress has been made since the publication of the LDS in July 2017, as outlined below. However, issues have arisen since the adoption of the July 2017 LDS which warrant an early update to the LDS and adjustments to the milestones for the development of the Minerals and Waste Development Plan Documents.

Progress since adoption of the July 2017 LDS

1.9. In the previous LDS, consideration of responses on the Third Stage Consultation was scheduled for the 2nd quarter of 2017. This was undertaken and the Third Stage Consultation Response Document was published in September 2017.

1.10. In considering the responses to the Third Stage Consultation, the Council identified two substantive matters that need to be addressed and consulted on prior to the publication of the Plan under regulation 19 and 20.

a) Despite having conducted two calls for sites, the sites which were proposed for allocation in the Third Stage Consultation would not have provided the amount of mineral required over the life of the plan. A number of the sites had been submitted with very little supporting information which limited assessment and prevented them from meeting the proposed criteria for allocation. A 3rd call for sites which was undertaken as an integral part of the Third Stage Consultation, and the low number of sites was raised as a potential soundness issue in responses to the consultation and through a Critical Friend Review. A 4th call for sites was therefore required which would reach as many mineral operators and landowners as possible to maximise the likelihood of sites being put forward.

   This was reported in the July 2017 LDS, and a further 4th call for sites was scheduled for the 3rd and 4th quarter of 2017 and 1st quarter of 2018, allowing sufficient time during that consultation for landowners and mineral operators to come to agreement to support further proposals. The 4th call for sites was conducted on time, running from September 2017 to January 2018.

b) A number of consultees highlighted that allocating sites provides a presumption in favour of development and establishes the principle of development in those locations.

   The site selection process which informed the Third Stage Consultation was based on the principle that both allocated and windfall sites within the Strategic Corridors would be equally acceptable in planning terms, with proposals assessed on a site by site basis at planning application stage. The Council had taken this approach to enable significant flexibility in light of the limited numbers of sites submitted for consideration.

   It was reported in the July 2017 LDS that it was necessary to review this approach, and that actions to address these matters could result in changes to the locations for development proposed through the plan and therefore an additional consultation stage would be required to enable representations to be made under Regulation 18. This would also enable consultation on other wording and policy changes to the Minerals Local Plan following the representations received on the Third Stage

Consultation. The July 2017 LDS therefore included an additional a Fourth Stage Consultation on the draft plan, scheduled for Q4 2018.

Reasons for reviewing the Local Development Scheme

Preparation of Worcestershire Minerals Local Plan

1.11. Although preparation of the Fourth Stage Consultation version of the Minerals Local Plan is well underway, some staffing changes have taken place which were not known when the July 2017 LDS was approved. Due to the acknowledged difficulty in recruiting suitably qualified planning staff with knowledge and experience of mineral and waste planning policy development (see Table 5. Risk assessment matrix), this has been addressed through an internal reshuffle of roles and responsibilities within the wider Strategic Planning team, although the new team member is inevitably not as experienced in mineral and waste planning policy. The staff member from the Strategic Planning team previously produced the Sustainability Appraisal (SA) work for the Minerals Local Plan. This means that additional time is required for the SA work to be continued by specialist consultants.

1.12. Additional sites were submitted in response to the 4th Call for Sites, as well as some further information relating to existing site proposals. However, due to the need identified above to reassess the method for site selection, it is not appropriate to simply assess these submissions against the criteria used in the Third Stage Consultation. Options for managing and addressing these requirements have been considered alongside the need to have an up to date policy framework in place. Addressing site allocations in a separate Development Plan Document with its own preparation schedule will ensure that the strategic elements of the Minerals Local Plan can be progressed as quickly as possible to provide certainty over the vision, objectives, spatial strategy and development management policies. This will provide a high level of certainty in relation to whether stakeholders consider the method to be appropriate and robust, but will significantly delay the certainty provided to communities and developers by allocating Specific Sites and Preferred Areas.

1.13. The risk of decisions having to be made on mineral planning applications without an up to date local policy framework in place is high, as the local policies provided by the saved policies in the County of Hereford and Worcester Minerals Local Plan are limited. Some of the sites which have been proposed in response to the calls for sites to date are now coming forward for pre-application discussions, Environmental Impact Assessment scoping requests and full Planning Applications, so further delay in setting the strategic framework and development management policies for assessing these sites is undesirable. If sites do come forward as planning applications, the timescales involved could mean sites are considered and may be permitted more quickly than a plan including site allocations could be progressed, risking the plan being out of date before it is even adopted.

1.14. A government consultation on draft changes to the National Planning Policy Framework (NPPF) has also recently been undertaken (March – May 2018). The likely changes to the NPPF outlined through this consultation are being taken into consideration in developing content of Fourth Stage Consultation document, but there is currently no firm date for the publication of final version. For these reasons, it is considered that there should not be any delay in publishing the Fourth Stage Consultation, but sufficient time needs to be allowed following the Fourth Stage Consultation to ensure consistency against any changes in the final update to the NPPF.

Preparation of a Mineral Site Allocations Development Plan Document

1.15. As outlined above, preparation of a separate Mineral Site Allocations Development Plan Document will allow the main Minerals Local Plan timetable to stay on course. In addition, it will build in flexibility for the Site Allocations to be reviewed and revised if necessary without affecting the strategic policies set out in the Minerals Local Plan.

1.16. This change in approach is consistent with emerging direction in the draft NPPF in relation to setting out strategic policies, and takes into account the new requirement that, from April 2018, under Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), local planning authorities must review local plans at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

Review of the Waste Core Strategy for Worcestershire: Adopted Waste Local Plan

1.17. The Waste Core Strategy was adopted in 2012 and its implementation has since been monitored through the Authority Monitoring Report. Although the plan is for the period 2012-2027, it was set out in the July 2017 LDS that it is prudent to review the plan regularly to ensure that it is relevant to changes in local context and national policy.

1.18. From April 2018, under Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), local planning authorities must review local plans at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. This does not necessarily mean that wholescale revision will be required, but the government anticipates that most plans are likely to require revising in whole or in part at least every five years. Reviews should be proportionate to the issues, and Authority Monitoring Reports will play a significant role in determining whether there is a need to undertake a partial or full revision of a plan.

1.19. It is now more than five years since the Waste Core Strategy was adopted. A formal review will therefore be included as part of the next Authority Monitoring Report (Quarter 4 of 2018 to Quarter 1 of 2019), but as no significant failings have been identified through the Authority Monitoring Reports to date, the submission and examination of the Worcestershire Minerals Local Plan and the preparation of the Minerals Site Allocations Development Plan Document have been given priority.

1.20. The requirement for review was anticipated in the July 2017 LDS, which included provision to commence preparatory work for the review and revision of the Waste Core Strategy for Worcestershire in 2020 (Quarter 1). This provision for preparatory work is maintained in this LDS, but has been moved back to Quarter 2 of 2021. The implementation of the Waste Core Strategy will continue to be monitored through the Authority Monitoring Report and the Local Development Scheme will be revised if the need for a more urgent review and revision of the Waste Core Strategy is identified.

4. Documents to be prepared July 2018 – June 2021

1.21. Over the next three years Worcestershire County Council will prepare and adopt the Minerals Local Plan for Worcestershire, develop a separate Mineral Site Allocations Development Plan Document, and commence the review (and revision) of the Waste Core Strategy. The following section sets out the content and timetable for producing these development plan documents. All references to Regulations in this section refer to The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Table 2. Worcestershire Minerals Local Plan

Document:	**Worcestershire Minerals Local Plan**
Status:	Local Plan (Development Plan Document) to supersede the saved policies in the County of Hereford and Worcester Minerals Local Plan.
Role and content:	Set out the strategic policies for mineral development and restoration in the county, including a vision, objectives, spatial strategy, development management policies and monitoring schedule. This includes a strategy for the delivery of steady and adequate supply of minerals and locational criteria for development.
Geographical coverage:	Whole of the county of Worcestershire.
Chain of conformity:	Consistent with National Planning Policy Framework, part of the Development Plan for Worcestershire.

Timetable	
Initial consultation (Regulation 18)	Completed: • First Stage Consultation (October 2012 – January 2013) • Second Stage Consultation (November 2013 – January 2014) • First call for sites (July 2014 – August 2014) • Second call for sites and call for resources and infrastructure (July 2015 – September 2015) • Third Stage Consultation including Third call for sites (December 2016 – March 2017) • Fourth call for sites (September 2017 – January 2018) Scheduled: • Fourth Stage Consultation: scheduled Q4 2018 – Q1 2019
Publication (Regulation 19 & 20)	Scheduled: Q3 2019
Submission (Regulation 22)	Scheduled: Q4 2019
Independent Examination (Regulation 24)	Anticipated: Q4 2019 – Q3 2020
Receipt of Inspector's Report (Regulation 25)	Anticipated: Q3 or Q4 2020
Adoption (Regulation 26)	Anticipated Q4 2020 or Q1 2021

Table 3. Worcestershire Mineral Site Allocations Development Plan Document

Document:	Mineral Site Allocations Development Plan Document
Status:	Development Plan Document
Role and content:	To provide local policies to allocate specific sites and preferred areas for mineral extraction, to supplement the strategic policies in the Minerals Local Plan and assist with the delivery of steady and adequate supply of minerals.
Geographical coverage:	Sites within the county of Worcestershire.
Chain of conformity:	Consistent with National Planning Policy Framework, sits alongside the Minerals Local Plan as part of the Development Plan for Worcestershire.

Timetable	
Initial consultation (Regulation 18)	Completed: • First call for sites (July 2014 – August 2014) • Second call for sites (July 2015 – September 2015) • Third call for sites (as part of the Third Stage Consultation on the Minerals Local Plan) (December 2016 – March 2017) • Fourth call for sites (September 2017 – January 2018) Scheduled: • Consultation on site selection methodology (alongside Fourth Stage Consultation on the Minerals Local Plan): scheduled Q4 2018 – Q1 2019 • Consultation on draft Mineral Site Allocations Development Plan Document: scheduled Q3 2020 – Q4 2020
Publication (Regulation 19 & 20)	Outside the period covered by this LDS.
Submission (Regulation 22)	Outside the period covered by this LDS.
Independent Examination (Regulation 24)	Outside the period covered by this LDS.
Receipt of Inspector's Report (Regulation 25)	Outside the period covered by this LDS.
Adoption (Regulation 26)	Outside the period covered by this LDS.

Table 4. Worcestershire Waste Core Strategy

Document:	**Waste Core Strategy for Worcestershire: Adopted Waste Local Plan**
Status:	Local Plan (Development Plan Document)
Role and content:	Set out the strategic policies for waste management development in Worcestershire, including a vision, objectives, spatial strategy, development management policies and monitoring schedule. This includes identifying waste management capacity requirements for the county and setting out locational criteria for development.
Geographical coverage:	Whole of the county of Worcestershire.
Chain of conformity:	Consistent with National Planning Policy Framework, part of the Development Plan for Worcestershire.
Milestones: Adopted November 2012	

Review and Revision timetable:	
Plan review (Regulation 10A)	Scheduled: • Review through Authority Monitoring Report Q4 2018 – Q1 2019
Initial consultation (Regulation 18)	Scheduled: • Preparatory work for review and revision of Waste Core Strategy Q2 2021
Publication (Regulation 19 & 20)	Outside the period covered by this LDS.
Submission (Regulation 22)	Outside the period covered by this LDS.
Independent Examination (Regulation 24)	Outside the period covered by this LDS.
Receipt of Inspector's Report (Regulation 25)	Outside the period covered by this LDS.
Adoption	Outside the period covered by this LDS.

5. Resources and Risk Assessment

Resources

1.22. The Council's Minerals and Waste Planning Policy team will lead on the development of the Worcestershire Minerals Local Plan, Mineral Site Allocations Development Plan Document, and supporting evidence, and the review and revision of the Waste Core Strategy for Worcestershire.

1.23. This will be supported as required through existing staff and expertise from the wider Planning unit (Strategic Planning, Development Management, and Environmental Policy) as well as from the Council's Archive and Archaeology, Highways Policy, Highways Development Management, Sustainability, Countryside and Flood Risk teams. Where support or specialist expertise from outside consultants is required, contracts will be managed by staff in the Minerals and Waste Planning Policy, Strategic Planning, or Environmental Policy teams (as most appropriate) to ensure delivery of specified outputs and outcomes.

Procedures for Member Approval

1.24. In order to develop the Minerals Local Plan in a timely and efficient manner the Cabinet has authorised1 the Director of Business, Environment and Community in consultation with the Cabinet Member with Responsibility for Economy and Infrastructure to agree the production, publication of and consultation on the documents prepared during the course of developing the Minerals Local Plan, without the need for further approval by Cabinet during the pre-publication stages of plan preparation (governed under regulations 18 and 19).

1.25. However the statutory Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) require that the plan must be approved by Cabinet and Council before submission to the Secretary of State for Examination or Adoption. The proposed submission version of the Minerals Local Plan will be submitted to Cabinet and Council for approval prior to the regulation 19 pre-submission consultation.

1.26. In addition all of the Council's Members will be consulted as part of every formal consultation and will be contacted as appropriate to inform them of any specific matters which might affect their division or responsibilities.

Risk Assessment

1.27. The Council recognises that there are risks in delivering the documents in the timescales set out in this Local Development Scheme. Some of these risks are within the Council’s control and some are not. The main areas of risk, their impacts and the ways to overcome them so that the programme in the Local Development Scheme can be delivered are identified below.

[1] Cabinet meeting of 27 September 2012, Minute 1414.

Table 5. Risk assessment matrix

Area of potential risk	Consequences and impacts	Likelihood of occurance	Measures to mitigate against potential risk	Overall risk level taking account of potential mitigation
Availability of qualified planning staff with knowledge and experience of mineral and waste planning policy development.	**High impact:** • Unable to complete documents on time - consequential programme slippage leading to delay in adopting documents. • Unable to complete documents to the required standard – could lead to documents having to be withdrawn if found unsound, being subject to successful legal challenge.	**Medium likelihood:** • Potential for staff turnover / sickness absence / maternity leave etc. • Recruitment of planning officers with suitable qualifications and experience has been demonstrably difficult both within Worcestershire and in the wider region.[2]	• Minerals and Waste Planning Policy team dedicated to plan production, enabling specialist mineral and waste skills and experience to be applied, and local knowledge to be utilised. • Planning staff are encouraged to undertake Continuing Professional Development in line with the Code of Practice of the Royal Town Planning Institute. • The council subscribes to the Planning Officers Society's Mineral and Waste Learning Group. • Further support and expertise is provided by the wider Strategic Planning, Environmental Policy and Development Management teams as necessary, with	**Medium**

[2] In May 2017 there were only 15 experienced minerals and waste planners employed in the 14 Minerals and Waste Planning Authorities in the West Midlands.

Area of potential risk	Consequences and impacts	Likelihood of occurance	Measures to mitigate against potential risk	Overall risk level taking account of potential mitigation
			contingency within allocated budgets to enable use of temporary staff or consultants to supplement in-house team if required.	

Changes to external context	**High impact:**
	
	• Changes to national policy and guidance
	  ○ consequential programme slippage while implications are considered and addressed, leading to delay in adopting documents.
	  ○ could lead to documents having to be withdrawn if not in general conformity with national policy and found unsound, being subject to successful legal challenge, or difficulties in using the policies in decision making for mineral and waste planning applications if there is conflict with national policy.
		High likelihood:
		
		• Changes to the National Planning Policy Framework and national Planning Practice Guidance are anticipated, but no firm date has been set for their publication.
		• Uncertainty over further changes to national policy or legislation as a result of the UK exit from the EU.
		• The Local Plans produced by the City, Borough and District Councils are subject to requirements for regular review. Revision of some or all of the adopted Local Plans in the county is underway.
			• Monitor national and local policy announcements and consultations, build in sufficient flexibility in LDS programme to consider and address anticipated changes (e.g. revised National Planning Policy Framework publication);
			• Regular assessment of consistency with national policy through Authority Monitoring Report (AMR) for adopted plans;
			• Engage in constructive dialogue with City, Borough and District Councils in accordance with the Duty to Cooperate to ensure that implications for mineral and waste are taken into account in
				High

Area of potential risk	Consequences and impacts	Likelihood of occurance	Measures to mitigate against potential risk	Overall risk level taking account of potential mitigation
	• Development proposals in City, Borough and District local plans will impact on mineral resource demand and waste management infrastructure requirements, and could lead to sterilisation of mineral or waste resources or infrastructure.		revisions to Local Plans. • Monitor future trends and predictions.	
The willingness and ability of other stakeholders to contribute effectively to the development of plans and advise on conformity with national policy and soundness.	**High impact:** • If stakeholders are not willing or able to respond or assist within requested timescales - consequential programme slippage leading to delay in adopting documents. • If stakeholders are not willing or able to provide requested data or assistance – could lead to documents having to be withdrawn if found unsound, being subject to successful legal challenge.	**High likelihood:** • Budget and staffing pressures are being experienced by almost all statutory and third sector stakeholders. • Statutory stakeholders such as Natural England and the Environment Agency are moving more towards standing advice and may not be willing or able to contribute in detail to plan development outside of formal consultation stages.	• Stakeholders understand progress in the development of minerals and waste plans through regular updates. There is high-level understanding of the synergies between the organisation's aspirations and what the plans aim to achieve. • A Green Infrastructure working group for the Minerals Local Plan has assisted with focused and collaborative input from relevant stakeholders during the development of the Minerals Local Plan. • The council engages with other Mineral Planning Authorities,	**Medium**

Area of potential risk	Consequences and impacts	Likelihood of occurance	Measures to mitigate against potential risk	Overall risk level taking account of potential mitigation
			primarily through the West Midlands Resource Technical Advisory Body for Waste (RTAB) and Aggregate Working Party (AWP), and discussing experiences and sharing good practice through the Planning Officers Society's Mineral and Waste Learning Group.	
Capacity of the Planning Inspectorate (PINS) and availability of Inspectors with minerals and waste experience	**High impact:** • PINS unable to meet demand for DPD examination – consequential programme slippage leading to delay in adopting documents and decisions on mineral and waste planning applications having to be made without an up to date local policy framework, and increased risk of inappropriate, speculative planning applications if there is no up-to-date Local Plan. • PINS unable to provide an Inspector experienced in minerals and waste planning policy examination – could lead to longer examinations,	**Medium likelihood:** • Staff changes at PINS over the last few years have seen the retirement of several experienced mineral and waste planning inspectors. • Officers are aware of several Mineral / Waste Plans being prepared on a similar timescale to the Worcestershire Minerals Local Plan, and therefore there is a likelihood of high demand on PINS resources.	Notify PINS three months prior to commencing Pre-submission consultation (Reg 19)	**High**

Area of potential risk	Consequences and impacts	Likelihood of occurance	Measures to mitigate against potential risk	Overall risk level taking account of potential mitigation
	more hearing sessions and greater costs incurred than envisaged.			

6. Monitoring and Review

1.28. It is a statutory requirement that the Council prepares an Authority Monitoring Report[3] (AMR) to assess progress in the implementation of the Local Development Scheme and the extent to which the objectives of Worcestershire County Council's adopted development plan documents are being achieved or are still relevant.

1.29. In relation to each document included within the LDS, monitoring must be carried out on:

- The timetable included for that specific document;
- The stage that the document has reached in the production process; and
- If the document is behind the timetable set out in the LDS, the reasons for this.

1.30. The AMR will be published as soon as practical after the relevant data becomes available. The AMR both informs the council's own work and feeds into the preparation of Local Development Documents produced by the County, District and Borough Councils. As well as progress in plan-making, this will be the opportunity to report on the monitoring indicators in adopted Local Plans to assess policy performance. The AMR will provide the evidence to consider whether there is a need to review the Development Plan Documents adopted by Worcestershire County Council prior to the date of review set in those documents.

1.31. A full review of the LDS will be undertaken if changes impact on the milestones in Table 2, Table 3, or Table 4, or following the adoption of the Worcestershire Minerals Local Plan.

[3] Formally called the "Minerals and Waste Local Development Scheme Authority Monitoring Report"

Appendix 1: Minerals and Waste Development Framework Project Plan Schedule

Key	
C	Completed
S	Scheduled

Document	Activity	2017				2018				2019				2020				2021		Beyond the period of this LDS
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	
Worcestershire Minerals Local Plan	Third Stage consultation (Reg 18)	C																		
	Consideration of representations		C	C																
	Fourth call for sites			C	C	C														
	Preparation of Fourth Stage Consultation document		C	C	C	C	C	S	S											
	Fourth Stage consultation (Reg 18)								S	S										
	Consideration of representations									S	S									
	Pre-submission consultation (Reg 19)											S								
	Submission (Reg 22)												S							
	Independent examination (Reg 24)												S	S	S	S				
	Receipt of Inspector's Report (Reg 25)															S	S			
	Adoption (Reg 26)																S	S		
Mineral Site Allocations Development Plan Document	Consultation on site selection methodology (under Reg 18)								S	S										
	Consideration of representations										S	S								
	Preparation of draft document												S	S	S					
	Consultation on draft document (Reg 18)															S	S			

Document	Activity	2017				2018				2019				2020				2021		Beyond the period of this LDS
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	
	Consideration of representations																	S	S	
	Pre-submission consultation (Reg 19)																			Task to be scheduled in a future LDS
	Submission (Reg 22)																			Task to be scheduled in a future LDS
	Independent examination (Reg 24)																			Task to be scheduled in a future LDS
	Receipt of Inspector's Report (Reg 25)																			Task to be scheduled in a future LDS
	Adoption (Reg 26)																			Task to be scheduled in a future LDS
Waste Core Strategy for Worcestershire	5 year review through Authority Monitoring Report				S	S														
	Preparatory work for review and revision of Waste Core Strategy																		S	
	Consultation on draft document (Reg 18)																			Task to be scheduled in a future LDS
	Consideration of representations																			Task to be scheduled in a future LDS
	Pre-submission consultation (Reg 19)																			Task to be scheduled in a future LDS
	Submission (Reg 22)																			Task to be scheduled in a future LDS
	Independent examination (Reg 24)																			Task to be scheduled in a future LDS
	Receipt of Inspector's Report (Reg 25)																			Task to be scheduled in a future LDS
	Adoption (Reg 26)																			Task to be scheduled in a future LDS

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