

# CABINET MEMBER DECISION Date of decision – 1 AUGUST 2025

# FUTURE DELIVERY LOCATION FOR WORCESTERSHIRE COUNTY COUNCIL'S RESIDENTIAL REPLACEMENT CARE PROVISION FOR ADULTS WITH LEARNING DISABILITIES.

# Relevant Cabinet Member

Sue Eacock

**Relevant Chief Officer** Strategic Director's Title

Local Member(s)

As appropriate

#### Recommendation

1. The Cabinet Member with Responsibility for Adult Social Care is recommended:

- (a) To note the outcome of the public consultation as summarised in paragraphs 8-15;
- (b) To approve the relocation of residential replacement care services from Worth Crescent and Pershore to Greenhill Lodge in Worcester;
- (c) To approve a consultation on the relocation of day services provision at Worcester Resource Centre into Greenhill Lodge ahead of a final decision, and;
- (d) To recommend to Council the use of £619,390, subject to a final decision on relocation of Worcester Resource Centre, of the existing Capital Investment in Community Capacity/ Specialised Housing to fund the relevant refurbishment costs

#### Background

2. As part of its duties under the Care Act 2014, the Council must meet the care and support needs of adults and the support needs of carers who are assessed as eligible under the Act's eligibility criteria. This includes the provision of replacement care (often referred to as respite or a short break) where this is specified in an individual's Care and Support Plan as being the most appropriate way of meeting one or more eligible needs.

3. Replacement care is largely categorised and provided for in two age groups either older people 65+ or 18-64. For working age adults i.e. the age 18-64 cohort with, primarily, Learning Disabilities (LD), Worcestershire County Council (the Council) provides two replacement care units: Worth Crescent, in Stourport, which is a 10-bedded unit, and Pershore Short Breaks, a 4-bedded service. These services provide both planned and emergency overnight replacement care for adults with care and support needs who are normally supported at home by their families, or in some cases by a Shared Lives Carer.

4. A report was considered at the County Council's Cabinet on the 16 January 2025 (and Adult Care and Wellbeing Overview and Scrutiny Panel on the 20 January 2025) to seek approval to commence a consultation on proposed changes to the locations of the Council's internally provided Replacement Care provision. The Cabinet Report detailed the current cost and occupancy levels at both Worth Crescent and Pershore Short Breaks and gave an indication to the known property issues and likely capital spend.

5. The recommendation, which was agreed by Cabinet on the 16 January 2025, was to consult on four options for future service delivery to ascertain the views of existing and potential service users and their carers. The four options were: -

Option 1: Stay in the current locations (Worth Crescent and Pershore) Option 2: Consolidate both current locations into an existing, but vacant (other than a short-term lease in place with Myriad), building in Worcester Option 3: Consolidate Worth Crescent into Pershore and renovate Pershore to increase

Option 3: Consolidate Worth Crescent into Pershore and renovate Pershore to increase available beds

Option 4: Externalise the provision

6. Alongside the public consultation (see supporting information for consultation document and results) further work was carried out to review the feasibility of each of the four options. This work included a market appraisal of the value of properties, clarification of the building costs required for options one - three (including refurbishment and ongoing revenue costs), proposed staffing structures required for options one - three and impact on transport arrangements.

7. This report summarises the feedback from the consultation and the feasibility work for each option.

# Feedback from Public Consultation

8. The consultation focused on the rationale for the change, the impact on existing services and service users (including transport arrangements) along with the proposed implementation plans. The consultation commenced on the 27 January 2025 and ran for 12 weeks until the 21 April 2025. A survey was shared to all individuals who use both Worth and Pershore provision, their family carers, and to the wider community (such as those transitioning from Children Services) to ensure everyone had an opportunity to respond to proposals. Worcestershire Association of Carers also promoted the survey to reach a wider audience.

9. SpeakEasy N.O.W. was contracted to support with creating an easy read version and engage with individuals who use the services to ensure the voice of the customer was heard and any views were captured to inform decision-making on the proposals.

10. A total of 42 responses was received through the online survey. The survey was completed by carers, but the number equates to 44% of total service users (92 service users) at Worth Crescent and Pershore.

11. The main comments (see supporting information for full copy of consultation results) raised focused on how individuals would manage the change in provision and

seeking assurance that if a change in location was decided then this change would be managed sensitively. There were also comments raised around concerns relating to loss of excellent and valued staff, who service users have positive relationships with. Transport was also raised as a concern depending on the location. Out of the 41 individuals who responded 20 of them have transport provided by family so this raised concerns around the distance to the new provision. Only one individual advised if the provision was to move to another site that they would no longer attend and wishes to remain at Worth Crescent.

12. Capacity and booking 12 months in advanced were also raised as an issue and individuals felt that it should be more flexible for individuals to use the service and not have to be booked so far in advance.

13. SpeakEasy N.O.W. visited both Worth Crescent and Pershore short breaks and in total met with 18 individuals. SpeakEasy N.O.W. used pictures to support individuals to respond with views and staff at the centres also helped individuals to fill in responses. They used the opportunity to ask individuals their thoughts on both Worth and Pershore, describing what they like and things they would like to change. This report is attached in the appendix. Some of the key future considerations from the report are: -

- Being supported by staff who know them well will be important.
- Being able to maintain friendships will be important. This could possibly include planning when people can stay at the same time as others they get on well with.
- Keeping some of the things from Pershore and Worth Cresent will help somewhere new to feel more familiar.
- For people who currently stay at Pershore, moving to a bigger building with more people might be difficult. They may need the space and opportunity to relax, so they do not feel overwhelmed
- It would be good to make sure people know what anywhere new will be like before they go to stay for the first time. This might include showing photos or a visit to look around
- It would be great if people can be involved in choices about decoration of a new building, equipment and other resources.
- Being involved in planning for any changes and feeling that their suggestions have been listened to will help people adapt to changes.

14. Two engagement sessions took place at both Worth Crescent and Pershore which gave family carers an opportunity to meet face to face with the Senior Officers leading the consultation and review any concerns about the proposals. The sessions were well attended (20 people in total attended), and carers were given the opportunity to share their thoughts around the four options and ask any questions. Those attending the Worth Cresent session were mainly in favour of a move to Worcester, recognising that the current building at Worth is limited in what it can provide. Family carers of Pershore attendees were more cautious about any move. Comments and questions raised at both sessions reflected the findings of the survey e.g. assurance over transport arrangements, a clear desire to retain the much-valued staff at both venues and assurances around how any changes would be managed.

15. No major issues were raised around any of the four options put forward, although Option 4 (externalise) was considered the least favourite because of the lack of clarity on what services would look like.

# Market Engagement – Review of Option 4 'externalise provision'

16. Option 4 of the future options for the Council's replacement care services was to consider outsourcing all replacement care service to the external market. This would be considered alongside options 1-3 if the business case for these options resulted in a poor return on investment and the external market were able to meet Care Act eligible needs at a lower price.

17. The Council developed a questionnaire to engage with local and national care providers to gain an understanding of experience and interest in delivering this type of support. This questionnaire, (see supporting information for a copy of the questionnaire) was published on in-tend, the Council's electronic tendering site, for a 2-week period.

18. Six providers submitted responses, all of which stated they would be interested in offering a learning disability care home replacement care provision in Worcestershire. However, only three of these providers currently deliver services in a residential care home setting, and only one of these specialises in supporting the learning disability client group. None of these providers have an existing property within Worcestershire and would need to source a location. Most of the providers that responded have experience of TUPE transfer of services, including some from NHS and local authorities.

19. Most providers couldn't give an approximate fee per week to deliver this type of provision, as this would be dependent on the running costs of the location and core staffing model alongside any TUPE implications.

20. Most providers expressed a preference for a block contractual arrangement as most suitable for a replacement care service. The Council currently have block arrangements in place for other LD replacement care contracts with external providers. Whilst block contracts can guarantee a provider an agreed payment during a set period, securing capacity is available for the local authority, there is also a risk that if the service is not fully utilised the effective unit cost may be more expensive than spot purchasing arrangements.

21. Service users and carers value choice, block contracts do limit their control over which organisation provides support. However, by working with a single provider effective partnership arrangements and positive working relationships can be developed between the provider, commissioner, and other key stakeholders such as service users, their families, and social work teams.

22. Providers also commented that if new services are being developed these buildings should be future proof and accessible. Some providers are seeking potential supported living sites and would welcome the opportunity to discuss with the Council if there are any properties available suitable for adaptation to meet demand for Supported Living services.

23. Based on the market engagement responses there are limited specialist providers with experience of delivering this type of provision. Any external provider would have to source, and potentially adapt, a property if a location was not provided by the Council. It would be difficult to estimate a realistic timescale to achieve this and gain CQC sign off for a new service location registration, as this would be dependent on

properties available and building works required. External providers are not able to give a reliable approximation of the fees required to deliver this type of provision without a clear understanding of the running costs of the location and core staffing model alongside any TUPE implications. Therefore, is it is not recommended to further pursue this option.

### Summary of Options Appraisal – Options 1 - 3

24. The options appraisal included a market analysis of the value of properties, clarification of the building costs (including refurbishment and ongoing revenue costs such as heating and lighting), proposed staffing structures and impact on transport arrangements.

25. The table below summarises the expected costs for Options 1-3 along with the estimated value of the properties that would become vacant as a result (if the decision was made to sell).

# Table 1: A summary of the expected costs, revenue and capital, and estimated sale value for options 1-3

	Refurbishment Costs (Capital)	Revenue Costs	Removal & IT Costs	Total Costs	Max Sale Values
Option 1 – Retain existing	£897,924 (Worth = £715,423 & Pershore = £182,501)	£70,400	£0	£968,324	£0
Option 2 – Worth and Pershore relocate to Greenhill Lodge	£550,000	£70,000 (no material change to budget)	£35,000	£655,000	£750,000 - £850,000
Option 3 – relocation of Worth to refurbished Pershore property	£732,744	£50,000	£16,500	£806,244	£250,000 - £300,000

26. Option 2 (Relocate to Worcester – Greenhill Lodge) demonstrates the best value for money. It is the cheapest cost overall and presents a bigger opportunity to obtain capital receipts through the sale of surplus buildings. Option 2 has a total refurbishment cost of £0.550 million which will need to be funded via capital.

27. A review of current transport costs for Pershore and Worth took place to consider the impact of a move (Either to Greenhill Lodge or to Pershore) and the estimated figures are provided below.

#### Table 2: The estimated additional transport costs for options 1-3

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12,000
21,000
12

**Note:** This is just estimated based on those individuals who don't currently require transport due to family supporting, who then may require transport if the move takes place. Some families may still be able to continue and transport routes may change at the time of transferring people to the new service. There could also be individuals who received transport previously but may not require transport moving forward.

28. A review of staffing requirements for the three options has been developed. This is based on expected occupancy level and CQC staffing level requirements.

#### Table 3: Proposed staffing costs for options 1-3

	Worth Crescent	Pershore	Greenhill Lodge	Total £
Option 1 – Retain existing	£638,656	£475,216	0	£1,113,872
Option 2 – Worth and Pershore relocate to Greenhill Lodge	0	0	£1,015,576	£1,015,576
Option 3 – relocation of Worth to refurbished Pershore property	0	£979,325	0	£979,325

\* Budget includes 3% potential pay award for 25/26

29. Option 2 (Move to Greenhill Lodge) creates a £98,296 annual revenue saving on current staffing spend (option 1). Option 3 (Move Pershore) creates a £134,547 annual revenue saving on current staffing spend (option 1).

### **Preferred Option**

30. The purpose of reviewing future delivery options for in-house Replacement Care services was to ensure that the service is efficient, cost-effective and future proof. The analysis of options 1-3 (option 4 to externalise provision had previously been discounted) highlights the most cost-effective option, when considering the cumulative effect of costs of relocation and savings in staffing, is a move of provision to Worcester – Greenhill Lodge. This option would create staffing efficiencies compared to the current operation, operate from a building that is newer and more fit for purpose, cheaper to renovate and allow the potential sale of existing buildings. Therefore, it is recommended that the in-house Replacement Care Services delivered at both Worth Crescent and Pershore Short Breaks are moved and consolidated into Greenhill Lodge (Worcester City). This will be subject to CQC approving a new registration.

31. The Council currently receives a rental income of £45,000 per annum from the short-term lease at Greenhill Lodge. This was only ever a short-term income, originally for a period of 18 months, extended to 27 months, whilst the Council reviewed its future use of the property. This income would cease under the preferred option. This option would also leave part of the ground floor unoccupied and alternative options for this space have been considered and are outlined below.

#### Worcester Resource Centre (WRC)

32. Worcester Resource Centre (WRC) is for people who need a fully equipped base or benefit from the security of a staffed base from which to access their day services and day opportunities in the community. The service is based in Cherry Orchard in

Worcester and is owned by the County Council and is attended by 35 people. Following conversations with Property colleagues and Service Managers there is an additional option of further consolidating provision as part of the option to move Replacement Care into Worcester – Greenhill Lodge (recommended option for in-house replacement care services) to maximise the space available. There would be no change to the availability of the service provided but would allow the current WRC building to be either repurposed or sold and all available space at Greenhill Lodge to be fully occupied.

33. The relocation of Worcester Resource Centre was not included as part of the consultation on in-house replacement care services. However, a similar approach has been taken to the assessment of this move including building, transport and staffing costs to see if it further strengthens the business case to relocate in-house provision to Greenhill Lodge. Carers of service users accessing the provision at Worcester Resource Centres were also invited to attend 'drop-in' sessions to hear more about the proposed options. The options being considered are:

Option 5a - Relocation of Worth Crescent and Pershore Short Breaks to Greenhill Lodge and Worcester Resource Centre to be retained for Day Services

Option 5b – Relocation of Worth Crescent, Pershore Short Breaks and Worcester Resource Centre to Greenhill Lodge

34. The table below summarises the expected costs for Options 5a-5b along with the estimated value of the properties that would become vacant as a result (if the decision was made to sell).

# Table 4: A summary of the expected costs, revenue and capital, and estimated sale value for options 5a and 5b.

	Refurbishment Costs	Revenue Costs	Removal & IT Costs	Total Costs	Max. Sale Values
Option 5a: Worth / Pershore to Greenhill Lodge and WRC to be retained for Day Services	£700,000 (WRC = £150,000)	Current budgeted costs £129,685 (WRC = £59,685)	£35,000	£864,685	£750,000 - £850,000
Option 5b: Worth and Pershore and WRC relocate to Greenhill Lodge	£619,390	£84,799	£45,000	£749,189	£1,500,000- £1,650,000

35. The relocation of all services to Greenhill Lodge has a greater benefit as part as refurbishment costs is concerned and would allow a higher value of capital receipts from sale of sites

36. A review of current transport costs for took place to consider the impact of a move (Either to remain at WRC or move to Greenhill Lodge ) and the estimated figures are provided below.

	Worth and Pershore Move to Greenhill Lodge (option 2)	Worcester Resource Centre	Total Costs
Option 5a: Worth / Pershore to Greenhill Lodge and WRC to be retained for Day Services	£12,000	£0	£12,000
Option 5b: Worth and Pershore and WRC relocate to Greenhill Lodge	£12,000	£7,000	£19,000

#### Table 5: The estimated additional transport costs for options 5a and 5b

#### (Caveat)

This is just estimated based on those individuals who don't currently require transport due to family supporting, who then may require transport if the move takes place. Some families may still be able to continue and transport routes may change at the time of transferring people to the new service. There could also be individuals who received transport previously but may not require transport moving forward.

37. A review of staffing requirements for the three options has been developed. This is based on expected occupancy level and CQC staffing level requirements.

#### Table 6: Proposed staffing costs for options 5a and 5b

	Worth and Pershore Move to Greenhill Lodge (option 2)	Worcester Resource Centre	Total
Option 5a: Worth / Pershore to Greenhill Lodge and WRC to be retained for Day Services	£1,015,576	£998,089	£2,013,665
Option 5b: Worth and Pershore and WRC relocate to Greenhill Lodge	£1,015,576	£945,045	£1,960,621
Additional saving in staffing costs		£53,044	

\* Budget includes 3% potential pay award for 25/26

Option 2 (Move to Greenhill Lodge for replacement care only) creates a £98,296 annual revenue saving on current spend.

Option 5b (Move to Greenhill lodge including WRC) creates an increased saving of £151,340 annual revenue saving on current spend as an additional £53,044 saving can be made by co-locating WRC into the same Greenhill Lodge site

Although the costs of transport to Greenhill is slightly higher, it is not high enough to negate the benefit on reduced staffing.

38. The analysis of the additional options 5a and 5b have highlighted that a further consolidation of provision into Greenhill Lodge creates opportunities for additional efficiencies including the reducing ongoing revenue costs (property and staffing) and doubling the potential capital receipt if buildings are declared surplus and sold. In addition, moving the in-house day service from Worcester Resource Centre to Greenhill

Lodge creates the opportunity to improve the flexibility of offer available (e.g. opening times) which would be welcomed by Carers following the informal discussions.

### Recommendations

39. Taking into account the findings of the consultation and appraisal of options, the recommendation is to proceed with the option to consolidate both current locations (Pershore and Worth Crescent) into an existing, but vacant (other than a short-term lease in place with Myriad), building in Worcester (Greenhill Lodge).

40. In addition to this it is also recommended to consult with servicer users and their carers, ahead of a final decision, on the option to relocate provision from Worcester Resource Centre (WRC) into Greenhill Lodge to release this building for either alternative use or sale, i.e. Option 5b. The consultation will last for six weeks and be launched on the 11 August 2025 and finish on the 22 September 2025. There will be analysis of the findings which will form part of the final decision made by the Cabinet Member with Responsibility for Adult Social Care.

41. The expected one-off investment for Option 5b at Greenhill Lodge is  $\pounds$ 619,390 which covers the refurbishment of the site. This is recommended to be funded from the Capital Investment in Community Capacity/ Specialised Housing capital grant which is already accounted for within the capital programme.

42. A summary of the revenue implications of Option 5b is shown in the following table.

Revenue implications	£	Comments
Annual Savings in revenue	(44,886)	Difference between existing budgeted
operating costs		running costs of £129,685 and option 5a
		running costs of £84,799
Annual Savings in staffing	(151,340)	Does not assume any redundancy cost as
costs		efforts will be made to minimise impact on
		staff – should costs be incurred this will
		reduce the saving delivered in year 1
Total annual savings	(196,226)	
Additional transport costs	19,000	
Net annual savings	(177,226)	From Year 2 onwards
One off removal and IT	45,000	These will be offset against the year 1 saving
costs		
Year 1 reduced savings	(132,226)	

#### Table 7: Summary of revenue implications of Option 5b

43. The return on the investment is 3.7years compared to 6.8years if WRC is not included.

44. The potential capital receipt also doubles to £1,500,000-£1,650,000 if Pershore, Worth Crescent and Worcester Resource Centre are declared surplus by the Council.

45. It is assumed that income generation is not affected by this decision and income remains constant.

46. There are also wider operational benefits to including WRC as this maximises the space available at Greenhill Lodge and will allow for greater flexibility in the offer provided (e.g. opening hours) which will be welcomed by Carers.

47. If these recommendations are approved, the Directorate will be declaring the properties at Worth Crescent and Pershore Short Breaks surplus to the Directorate's requirement. This will require the relocation of the Adult Social Services Team located at Pershore Short Breaks. To mitigate the risk of Myriad (currently occupying Greenhill Lodge on a short-term lease) no longer having a suitable building to operate from, it is recommended that Worcester Resource Centre is not declared surplus to Directorate requirements at this stage and instead the Council consider leasing / selling WRC to Myriad to allow the continuation of day care provision.

# Finance implications

48. The costs of refurbishing Greenhill Lodge will need to be accounted for within the capital programme. Subject to agreement of this report, and a final decision on relocation of Worcester Resource Centre, further due diligence will be undertaken to finalise the overall capital costs required to refurbish Greenhill Lodge which is currently estimated at £619,390. The service has a Capital Investment in Community Capacity/ Specialised Housing capital grant within the existing capital programme totalling £1.039 million and the refurbishment would meet the grant requirements. It is therefore recommended that this grant be used to fund the refurbishment costs, subject to final approval by Full Council. This will avoid any additional revenue implications arising from borrowing.

49. The move to Greenhill Lodge allows for a net revenue saving of  $\pounds$ 177,226 per annum to be realised once the move is complete. This is  $\pounds$ 45,000 lower in year 1 as it assumed one off removal and IT costs are funded from the savings generated.

50. The potential implications of any redundancy costs will need to be funded from the year 1 savings. It is assumed that income generation and all other associated costs remain consistent in the new operation,

51. The sale of existing land and buildings will generate capital receipts which can only be used to fund additional capital expenditure or repay existing borrowing. The subsequent capital receipt values will support the council's overall capital programme and use of it will be subject to a future decision.

#### **HR** implications

52. A move to Greenhill lodge will require a formal staff consultation as new structure will be created for the new location. There will be potential redundancies, but every effort will be made to reduce or minimise these. A clear message from the consultation was how important the current staff in the delivery of a quality service.

53. If Pershore Short Breaks is declared surplus to Provider Services requirements going forward, there would need to be a review of office space to relocate Adults Social Care too as to retain the property for this small office purpose only would not be best

value and use of property. It is likely that they could relocate to the Pershore Civic Centre if a Pershore base was still required, or Wildwood, Worcester and both options are being considered.

# Legal Implications

54. Section 1 Care Act 2014, imposes a general duty on the Council to promote an individual's well-being whenever exercising any function under Part 1 Care Act 2014. 'Well-being' is not defined within the Care Act 2014 and is a broad concept. Although the well-being principle applies specifically when the Local Authority makes a decision in relation to an individual, the Care and Support Statutory Guidance Cabinet is clear that the principle should also be considered by the Council when it undertakes broader, strategic functions.

55. The Council must also have regard to the following matters in particular, pursuant to the following subsections of s1(3) Care Act 2014 (a) the importance of beginning with the assumption that the individual is best-placed to judge the individual's well-being; (b) the individual's views, wishes, feelings and beliefs and (e) the importance of the individual participating as fully as possible in decisions relating to the exercise of the function concerned and being provided with the information and support necessary to enable the individual to participate.

56. A needs assessment must be carried out where it appears to the Local Authority that a person may have needs for care and support. The assessment must identify whether the adult has any eligible needs. If there are, the assessment must state what those needs are. (s 9(1), Care Act 2014.) A Local Authority must also assess any carer (current or prospective) where it appears they may have needs for support. (s 10(1) Care Act 2014. Where a Local Authority is satisfied on the basis of a needs or carer's assessment that an adult or their carer has needs for care and support, it must determine whether any of the needs meet the eligibility criteria (s13 (1) Care Act 2014). Section 18 Care Act 2014 provides that where an adult is assessed as having eligible needs, the Council is under a duty to meet those needs. The criteria does not specify the types of care and support that a Local Authority must provide to meet eligible needs. Needs may therefore be met in a number of different ways e.g. by receiving replacement care it. Should an individual's respite centre close, alternative arrangements to meet those eligible needs must be made.

57. If the recommendations set out in paragraph 1 are agreed, prior to any changes arising, a users needs assessment and care and support plan should be reviewed. Where a care plan is to be altered, the Council must have regard to, amongst other things, the outcomes the individual wishes to achieve and the impact on a person's wellbeing. In offering alternative respite accommodation the Local Authority should have regard to the Care and Support (Choice of Accommodation) Regulations 2014. Consideration should also be given to updating any carers assessments.

58. This report details steps which would be taken to support individuals who would be affected by the proposals to identify alternative options for their current care and support provision. Following the consultation the Cabinet Member with Responsibility will need to take careful account of the views expressed in arriving at their decision. In addition, any decisions must also take into account the rights of service users as set out in the Human Rights Act 1998, specifically Article 8, "Right to respect for private and family life". Article 8 rights are not absolute and can be justified by public interest

considerations including economic factors. The report explains the balance which has had to be struck between the overall rationale for replacement care provision including the economic factors, against the potential impact on individual residents.

# Joint Equality, Public Health, Data Protection and Sustainability Impact Assessments

59. In assessing these proposals, the Council (and decision makers for this proposal) should have regard to the Public Sector Equality Duty (PSED) under the Equality Act 2010.

The PSED requires public authorities to have "due regard" to:

• The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010 (section 149(1) (a)).

• The need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it (section 149(1) (b)).

This involves having due regard to the needs to:

• remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic.

• take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it (section 149(4)); And

• encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

• The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it (section 149(1)(c)).

An initial JIA and subsequent EIA has been carried out. Within the screening process, the question that determines a full Equality Impact Assessment is that if there are any known inequalities to exist, a full assessment will be submitted. Preliminary consideration has been given to the impact of the proposals on each stated protected characteristic, as well as intersectional links, and public health impacts in drawing up these proposals. Due regard has been given to the requirement for an Equality Impact Analysis (EIA) which was carried out (appendix 4) in respect of the proposal options. Consultation documents and information (as well as engagement methods) were deemed suitable, accessible, provided in English as standard and could be translated online, or on request, other forms of translation such as Braille, BSL, large print and alternative options were additionally available on request.

#### **Supporting Information**

- 1. Consultation Document Services Review Survey
- 2. Consultation Results Service User Feedback
- 3. Report from SpeakEasy N.O.W
- 4. Preliminary Market Engagement Questionnaire
- 5. Equality and Public Health Full Impact Assessment
- 6. Environmental Sustainability Full Impact Assessment

#### **Contact Points**

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#### **Background Papers**

In the opinion of the proper officer (in this case the Strategic Director for Adults and Communities) the following are the background papers relating to the subject matter of this report:

• 16 January 2025 Cabinet Paper

Signed of on behalf of the CFO

Deputy CFO (25 June 2025)