

Please refer to Guidance Notes overleaf

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Forward Plan Ref. No.	2017 273 April – Elim Direct Access Community Project March 2017	Date of decision: 24th March 2017			
Name of Portfolio Holder	Nigel Woollcombe-Adams				
Name of Officer	Jai Vick				
Details of Decision	To award a maximum grant funding of £100,000.00p to deliver the Rough Sleeper Direct Access Community (DAC) project 1st April 2017 to 31st March 2018.				
	The funding will support:				
	 Direct Access accommodation unit within Mendip (consisting of 6 units) which will assist between 16-36 rough sleepers to move on into other sustainable accommodation over the extended 12 month pilot period 24 hour management of the project via on site manager Management and staffing on-costs (including travel) Office costs, including phone, copying, postage. Background 2015/16: Following observations made during the initial 18 month pilot the services were amended in 2015/16 to offer the following enhancements and reviews to the original service delivery namely:				
	 increase in staffing hours to capacity and quality of case revision of building risk man HMO status and duration of provision. 	work agement plan in relation to			
	These enhancements and revisions were delivered in 2015/16. The service was reviewed mid-term by the Housing Options manager who noted surprisingly low void rates during the first quarter, however, following more intensive work with rough sleepers / those at high risk of rough sleeping the team have seen void rates reduce significantly from 30% seen in May 2015 to just 6% in December 2015.				
	Whilst this was reassuring it was in sleeping remained and still do rem district – with numbers stablising a Rough Sleeper count for December continued need for a rough sleeper the time of conducting a second refin February 2016 there were 24 single the district – at the same time the	ain a challenge in the taround 16 in the annual or 2016 demonstrating a r provision in this area. At wiew of the DAC provision ngle persons sleeping rough			
	At the time of commissioning the s agreed the service would use the				

work with the SCC's P4a team to explore other sources of revenue income to support the service beyond 2015/16, this included both agencies being involved in discussions with Somerset County Council concerning the P4a contract revision which at the time was being discussed at a strategic level. At the time the SCC P4a service funded Direct Access Services outside of the Mendip area in South Somerset and Taunton Deane areas, it was therefore hoped there would be scope to draw in funds into the Mendip area - which has had the highest number of rough sleepers in all districts of Somerset year on year. However, during 2015/16 SCC made the decision to withdraw all P4a funding, therefore all Direct Access provisions across the County would be without what was originally known as Supporting People funding in future years. Whilst a transition fund has been provided this was not long term and thus any potential ongoing funding from SCC was not able to be pursued during 2015/16 due to decisions made by SCC to withdraw P4a funding support.

That said during 2015/16 SCC's drugs and alcohol commissioners agreed to fund £25k towards the service for on the basis it supported clients who suffered from drug alcohol abuse. Having discussed this with SCC commissioners, their department was unable to assist financially with the project moving forwards due to financial pressure, but they will continue to support via SDAS (Somerset drugs and alcohol service) attending regular monthly liaison meetings to ensure service users are receiving support.

Background 2016/17:

The targets were set to remain the same as developed within the original pilot period. The ultimate aim is always to work towards a reduction overall in monthly numbers seen to sleep rough over a period of 12 months by 10%. The service received Portfolio Holder support to continue to fund into 16/17 based on the following:

"The total funding required by Mendip DC £100,000.00p for the period 1st April 2016 to 31st March 2017— funded using a mix of DCLG homeless prevention grant fund and Housing Options revenue (B&B) budget.

Having reviewed the budget there is scope to make significant savings on this amount if the Elim Connect Centre were to review their rent charging regime. Having had initial discussions with Housing Benefit it may be possible for some of the staffing costs to be incorporated within the rental charge and there is also some scope for increasing rental charges and reducing void / bad debt charges which will offer a financial saving on the quotation of £100,000.00p required by Elim from MDC Housing Options Team. On this basis it is recommended that the Portfolio holder agree to fund a maximum of £100,000.00p on the basis the HOT manager work closely with the Elim connect centre to revise their costs.

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Elim have agreed to accept an initial payment of £50,000 and will agree to work to reduce the overall 12 months costs substantially by reviewing their rent charging and housing benefit chargeable costs within the first 6 months of the contract commencing. It is recommended the Portfolio holder delegate authority to the HOT manager to make a decision to fund up to the quoted amount on the basis it is likely the overall costs can be significantly reduced."

As you will see within the outcomes report at Appendix 1 for the financial year 2016/17 Elim invested significant resources into exploring opportunities to increase their revenue income – via increased rents in conjunction with Housing Benefit – whilst also making savings in other areas of expenditure. Unfortunately whilst some increased income has been achieved the overall scheme costs could not be reduced given restrictions in place on housing benefit allowances and rent levels. The net scheme cost overall to Mendip DC Housing Options service last year was £100,000.

Proposal:

As per appendix 1 – Elim Connect centre remain committed to delivering rough sleeper services. They feel there is opportunity in the market place to seek a partner agency (likely to be a registered provider) which has the potential to offer some financial savings on the overall net costs to the Council for running the service – given RP rent levels are subjected to different analysis by the housing benefit department. Given Elim is not a registered provider this seems the sensible next step to try to reduce the cost burden to the authority The proposal attached seeks further one years funding in two tranches – the initial £50,000 for 6 months to continue the service as per the proposal attached, whilst seeking partnership opportunities and the second stage to seek further funding from us for the remaining 6 months, up to £50,000 once these opportunities have been explored.

Elim current services and wider partnership services to compliment the work of the DAC:

Mendip Elim Connect centre currently provide Rough Sleeper Outreach services to engage with and support rough sleepers to move on from a life on the streets. The delivery of a DAC service dovetails with their work within this specialist client area. It is the only Mendip based agency focussing on activities to support those who are sleeping rough who require assistance to move on from the streets. There are currently no other direct access accommodation provisions within District. This service also dovetails with the recently commissioned Positive Lives model – in which Spencer House in Wells was commissioned to deliver a triage and low level supported housing project for individuals aged over 25 years. That scheme along with the DAC have now enhanced the move on opportunities and support available to single homeless



persons aged 25 years or over for whom transitioning into mainstream housing or social housing would not be sustainable initially. This fits with a pathway model which encourages clients to engage with wider services such as debt advice, Tenancy accreditation to name a few (all commissioned by MDC Housing Options services), aimed at ensuring clients are tenancy ready and able to support and sustain themselves in longer term mainstream social or private rented housing.

The profile of rough sleepers in Mendip finds that they tend to sleep rough in rural locations within the district – preferring a lifestyle of seclusion and non-engagement rather than a desire to live within more urbanised areas. This profile is unique in nature as other areas of high rough sleeper estimates / counts usually profile rough sleepers as being located within urban towns / cities. Therefore a standard approach to providing interim emergency bed places is not deemed an appropriate model for our area. In in past years an urban model existed and was funded by SCC under their P4a contract in the Yeovil area (P4a funding ceased in April 2016), however, of the 86 rough sleepers in Mendip in 2014/15, only 6 chose to re-locate to a direct access hostel some 20 miles away in an urban area (because there was no other alternative option). These two factors continue to present the most significant barrier in us being able to offer emergency accommodation options for these clients. It was therefore critical the original pilot project considered an opportunity to provide a rural setting for this client group to encourage them to engage with and sustain an emergency placement. It is therefore critical the service continues to offer an opportunity to secure placement for people in a rural setting to encourage the most entrenched rough sleepers into a life off the streets (or in our case mainly out of secluded areas).

An opportunity arose some 2.5 years ago for Elim Connect Centre to lease a rural premises set within a farm location with on site live in manager present from October 2014 for an initial 6 month pilot period. Limited funding to support such a project was only available to secure this for an initial 6 month period. The setting up of the facility was completed using money secured by Elim through Homeless Link (a national charity). The revenue income needed to sustain the accommodation based support was provided by Mendip District Council. Securing such a unique farm / rural setting with a live in manager along with the owner of the premises being willing to lease a property for a short period of time (6) months) for this purpose to operate a pilot project had up until October 2014 not been possible. The manager who already lives on site is a well regarded experienced officer having specifically worked with Rough Sleepers for many years.

The scheme worked well and a proposal to extend this pilot for a further 12 months was agreed by MDC portfolio holder



for the year 2015/16 and again into 16/17. This was based on the family's willingness to continue to allow the property to be rented to Elim for this purpose for this short term basis. The family are happy to continue with this arrangement and management will continue of the project in the same manner as for the 2.5 years (via the on site manager). This opportunity is unique and is therefore only presented to us via specifically commissioning with Elim Connect Centre.

Elim Connect Centre are therefore uniquely placed to offer this service given the manager lives on the farm and is prepared to continue to offer a unit on site for the purposes of offering emergency accommodation on an ongoing basis for the DAC project. Elim is the only agency focussing on activities to support those who are rough sleeping in the district. Further details are found in "reasons for decision".

Due to the nature of the proposal and the specialist nature of the work there would be no effective or genuine competition.

This means that the contract will be given exemption under the Council Constitution. Section 22 for Procurement, Clauses 6.3 H and I which cover

H "Social care contracts, being the provision of personal social services to individual clients; or individual contracts for temporary accommodation for the homeless; Standardisation of supplies or equipment is determined to be important and justified which renders further competition impractical".

I "The proposed contract related to specialised services or technical equipment where the requested User Department has made a qualitative judgement that the selected supplier is suited to carry out the work or furnish the equipment. The User Department must show there is no effective or genuine competition"

Details of consultation carried out:					
Tick	Tick				
V	Relevant Jai Vick	Relevant Group Manager (please specify) Jai Vick Date: 24/03/2017			
1	Any other Portfolio Holder whose area of responsibility is affected (please specify) Nigel Woolcombe-Adams Date: 24/03/2017				
V	Other (e.g. Ward Members) Date: n/a		Date: n/a		
Reasons for Decision The service to be commissioned with the Elim Connect		onnect Centre.			
	Mendip has consistently reported high numbers of rough sleepers since			of rough sleepers since	

official counts / estimates began nationally some five years ago. Whilst numbers had reduced slightly in recent years, attributed to the valuable investment made in preventative and proactive Rough Sleeper Outreach services we have commissioned with Elim Connect Centre the numbers



have now reached a plateau. This could only be attributed to the fact there was no direct access single homeless provision for rough sleepers to access within the district. However, during the period within which we have had a direct access facility available rough sleeper numbers have actually increased nationally, so whilst rough sleeper numbers remain at a figure of 16 (as reported in Dec 2016 – equivalent to a 20% decrease), comparing this to the figure reported in Dec 2014 and 2015 which was 20.

When compared with the national picture which has seen a 16% increase between December 2015 to December 2016. In fact nationally in England excluding London, the figure sees a 21% increase. So one could say it is likely without the DAC and outreach service provision it is highly likely our figures could have seen an increase to around 24 people sleeping rough as opposed to the current official figure of 16.

The numbers reported as a snapshot in time can vary from 16 (as seen in the official estimate submitted to Central Government in December 2016, figures were 20 in December 2014 and 15) up to 30 in peak times (usually seen in the summer months and often around the time of Glastonbury festival – many of which return to their 'home' area shortly after festivities cease).

Outcomes for clients on exit from the DAC are overall very good and are detailed within the proposal and report documentation at Appendix 1. In summary of the 22 clients moved on from the DAC during the first 3 quarters of 2016/17 only three clients did not secure accommodation – 2 left and became of no fixed abode and only one client returned to rough sleeping. Elim's wider services continue to engage with such clients to encourage alternative options or a return to DAC wherever possible in such cases.

Whilst there is direct access provision in outlying council areas – such as Yeovil, Bath and Taunton, strict Local connection criteria applies to these hostels, accordingly if a Mendip client presented for emergency hostel accommodation in these areas they would be reconnected back to Mendip. This supports the government's agenda of reconnection to encourage people to remain in their home area where support is likely to be more available and existing networks in place to support individuals. This also distracts clients from going to areas where more prevalent rough sleeper services exist. Mendip's DAC also operate on a strict local connection criteria to support this ethos, whilst they will place someone within the DAC who needs to be reconnected back to their home area (ie another area in England) they will only do this for one or two nights whilst the arrangements are made.

In this most recent financial year there have been 29 (between 1st April 2016 & 31st December 2017) rough sleepers / clients who are at imminent risk of sleeping rough who have accessed the accommodation (statistics only available up to 31st December 2016). When compared to just 6 that accessed direct access facilities in 2013/14 outside of the District in Yeovil, funded by SCC (under the P4a contract). This clearly demonstrates the location and type of accommodation provided for rough sleepers which historically was funded by SCC did not meet the needs of Rough Sleepers

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in our district and demonstrates these two factors alone are critical to the decisions made by these clients to move on from a life on the streets.

The intake from the group of long term entrenched rough sleepers has been lower than anticipated but it is important to point out the move from a life on the streets for entrenched rough sleepers is a significant step. Elim continue to develop their strategies to encourage these clients to take that step. They have been taking these clients to the farm to encourage them to join in with activities, share a meal and visit the facilities there. Over time it is anticipated their confidence will grow and will attempt to move from a life off the streets into the community project.

The very nature of their non-engaged lifestyle on the streets (often living in Woods in the Wells area) means this client group find it immensely difficult to engage with statutory or voluntary agencies. Elim spend a significant amount of time gradually increasing their trust and engagement in order to foster good relations with this client group to assist them in resolving issues such as drugs / alcohol / mental health (often the causal reason for them becoming homeless in the first instance). From there they will work with them to secure temporary emergency housing to then enable them to support their rehabilitation for both any issues they may have and back into society. The continued availability of this accommodation is critical in their ability to secure housing for the longer term and offer them the ability to have a stable and sustainable place they can call home to enable treatments for drug / alcohol or Mental Health conditions to be successful. The reality of securing permanent housing immediately from a life on the streets without the ability to secure some form of temporary housing in between is limited. We can clearly demonstrate therefore that the ongoing need for this project is vital in securing a life off the streets for these people who are street homeless in our district.

National statistics - Homelessness: A silent killer

In December 2011 a National charity for single homeless people, CRISIS, published a briefing which set out the findings of a study investigating homeless mortality in England – entitled "Homelessness: A silent killer".

The Key points covered in the briefing state:

- The average age of death of a homeless person is 47 years old and even lower for homeless women at just 43, compared to 77 years for the general population.
- Drug and alcohol abuse are particularly common causes of death amongst the homeless population, accounting for just over a third of all deaths.
- Homeless people are over 9 times more likely to commit suicide than the general population
- Deaths as a result of traffic accidents are 3 times as likely, infections twice as likely and falls over 3 times as likely.
- Being homeless is incredibly difficult both physically and mentally and has significant impacts on people's health and well being.
- Ultimately, homelessness kills.

The statistics are shocking and should be considered in any future decisions the Council makes when deciding whether or not to take steps to reduce rough sleeping in our district.



Existing Direct Access Hostel Provision:

As mentioned above there are a number of Direct Access homeless night shelters / hostels in the wider area but none are available to Mendip clients given strict Local Connection criteria in place – which encourages reconnection back to home local authority areas.

Rough Sleeper numbers:

The Rough Sleeper numbers reported in England by all Local Authorities in Autumn 2016 show a overall 21% increase in England (excluding London). The extent of our numbers is significant and cannot in my view be ignored, given we are a small rural authority. Numbers below are officially reported Counts and Estimates of Rough sleepers in the local area and wider as at December 2016. You will note Mendip has this year reported the second highest numbers in the Somerset area (an improvement as in 2014 we had the highest number of rough sleepers in Somerset), all but one of the other Somerset authorities saw an increase in numbers this year, which demonstrates we have appropriate measures in place to be supporting these individuals and bucking the trend of increased numbers, but are above some much larger urban areas such as Poole UA.

	South West top 5:	
16 (20 in 2015)	Cornwall UA 99 (65 in 2015)	
20 (21 in 2015)	Bristol UA 74 (97 in 2015)	
8 (5 in 2015)	Exeter City 41 (27 in 2015)	
2 (6 in 2015)	BATH&NES UA 24 (22 in 2015)	
2 (4 in 2015)	Plymouth 20 (12 in 2015)	
	20 (21 in 2015) 8 (5 in 2015) 2 (6 in 2015)	

Our numbers have consistently been reported as the fourth or fifth highest for the last few years in the South West, demonstrating a continued need for investment to assist this vulnerable client group in our district. However, 2015 and 2016 are the first years we have seen our position drop down to 6th highest in the southwest, whilst our neighbouring Council Taunton Deane were 5th with 20 rough sleepers for the second year in a row, this is only 1 higher than us so we must not become complacent. It is unacceptable in this day and age for people to find themselves sleeping rough and therefore we should continue to invest in supporting those people off the streets. These statistics however do demonstrate the work of the DAC and outreach is making an impact into the numbers.

Taking into account the number of rough sleepers in our district as opposed to other areas in our County (the other 3 LAs have an average 4 rough sleepers per district), we have over 4 times the rough sleepers in our area. As a result we are 4 times more likely to have someone die on our streets than 3 of our other neighbouring Somerset authorities.

Proposal:

I have attached a copy of the outcomes for 2015/16 along with proposals to commission the service into 2016/17. The scheme as mentioned is very different to a standard direct access hostel, in that it is based within a property located on a farm in a rural area. Rough Sleepers I personally have spoken to in our area often say they do not want to live in urban areas which is why they migrate to settings where rough sleeping is tolerated by the landowners in rural wooded areas in our districts – they seek to be



socially isolated it appears in the majority of cases. The outcomes demonstrated in Appendix 1 show this new non-urban setting is meeting the very different needs of the profile of the rough sleeper client group seen within Mendip as opposed to the models established in urban areas.

This is an exciting opportunity to continue to offer a direct access provision. It would not be viable for Mendip DC or Elim to invest monies into development of a property for a short term lease, or invest in a long term lease for a project for which Mendip can only guarantee funding on an annual review basis only as Mendip DC only has revenue funding available for a year on year basis.

Location is critical. The majority of rough sleepers are located in the Wells & Glastonbury areas. With Elim currently commissioned to deliver outreach support based out of a Wells office along with rough sleepers being accustomed to the Wells locality it would seem sensible to seek a location near to Wells. The opportunity which continues to be available is located on a farm to the north of the district which continues to represent a superb opportunity to enable easy access to Wells and surrounding areas, meaning the most entrenched rough sleepers currently located in Wells would stand a good chance of sustaining such a placement in the knowledge they can regularly access services in their current locality.

The location of the property offers a rural setting which does not interfere with neighbouring properties (as there will always be the assumption – whilst unfounded - that any such a set up will bring with it anti-social behaviour). The premises is located off the main road out of the north of the district surrounded by hundreds of acres of arable farmland and no near neighbours. The property in which the direct access units would be located is set within a separate house which is adjacent to the farmhouse.

It offers the opportunity to continue to operate a very different model without having to commit to a long lease, and offers the benefit of on site, 24 hour supervision at very low cost. Having explored other urbanised settings for a hostel placement we would need to recruit workers 24 hours, which increase costs of the project and affect financial viability without County Council funding – which is the only way in which the county council funded direct access projects are able to function. The supervision would be offered by an experienced Rough Sleeper worker, with an excellent track record, who lives on site herself (her husband runs the farm).

There are also wider benefits for the residents, including potential for employment / skills training on site within the farm, potential to assist manage the gardens / grow fruit / vegetables along with a small selection of business units also operating from the same site. The reports attached in Appendix 1 demonstrate the types of activities undertaken by the residents who have stayed at the farm so far. These include:

- 55% of residents have undertaken creative activities
- 18% have undertaken ceramic related activities
- 100% have gone rambling
- 91% have undertaken gardening activities
- 82% have taken up cooking activities
- 9% have undertaken IT activities



- 36% have undertaken farm work
- 55% have undertaken domestic activities
- 64% have undertaken work with animals
- 64% have undertaken mindfulness activities

Transport to and from the accommodation for attendance at meetings / doctors etc are included within the project costs and operated by the on-site "manager".

Overall this offers an excellent opportunity to continue to support a valuable service for rough sleepers. During the first 18 months we secured commitment from a wide variety of partners including Somerset Skills and Learning, Public Health, Somerset County Council who were involved in the project (from inception) and other key agencies with the aim of creating a successful project and excellent outcomes.

Other options:

We could of course do nothing, however, numbers will continue to remain high and given national trends will increase at a rate of at least 21% per annum (which with our previous levels of rough sleeping reported in December 2015 would have seen an annual increase to 24 rough sleepers on our streets) and ultimately the chance of a death on the street is much higher as quoted within the CRISIS reported mentioned earlier (46 years for women and 47 years for men as opposed to 77 years for the general population). Whilst this has the obvious effect of being a high risk for our existing rough sleepers it has the wider social / community impact (due to associated drugs / alcohol misuse on the streets for example), along with the reputational risk for the Council of a rough sleeper death whilst living on the streets in our district.

Tender – Not viable as no other providers could offer this unique service on an annually reviewable basis. No other providers would have access to this specific Farm only Elim, no-one else is likely to come forward to operate a direct access hostel for the funding available on a short term contract / lease. I am not aware of any farm premises willing to rent out a house on site for 12 months only, located in district accessible to Wells, with a 24hour on-site manager who has experience of working with rough sleepers. For these reasons I do not believe there are any other agencies / persons to commission such a project with. There are also the wider benefits of a seamless service from a client commencing engagement with Elim Outreach to securing accommodation operated by Elim at the Farm.

County Council re-commissioning to include Elim within P4a – no longer possible given P4a has been cut from SCC budget completely from 2016/17.

Consider enforcement action against landowners / enter into discussions with land owners who are permitting rough sleeping on their land to encourage them to enforce trespassing removing the ability to sleep in specific well known rough sleeping locations – whilst this is an option, this could create unrest with the rough sleeper population who are likely to move on and disengage with support services. Additionally enforcement / discussions with landowners to encourage them to take action is not ideal to take place unless there is somewhere for the rough sleepers to move



into. This action would not be recommended until a suitable rough sleeper direct access provision is settled and is generating trust within the rough sleeper community. During the next 12 months work will be considered to discuss the issue with landowners, also with Police and the antisocial behaviour team within the Council to discourage and prevent new rough sleepers accessing land for rough sleeping or rough sleeping in urban areas.

Cost:

The total funding required by Mendip DC £100,000.00p for the period 1st April 2017 to 31st March 2018 (see appendix 1) – funded using a mix of DCLG homeless prevention grant fund and Housing Options revenue (B&B) budget.

Elim Connect Centre have committed to exploring opportunities to partner with a suitable key agency which may offer financial savings on the contract amount. It is proposed the funding is released in two phases – initial £50,000 released from April 2017 to cover the first 6 months of the project during which time Elim will consider opportunities in the sector, with a delegation for a further £50,000 maximum for the remaining 6 months delegated to the Group Manager Housing Services following receipt of a further financial proposal in September 2017.

Elim Connect Centre have a solid supervision and trained staff structure in place, along with Safeguarding processes in place (to safeguard vulnerable adults and children) which has the capacity to manage the Project and workers. Where there are risk's to staff in terms of working with client's on a 121 basis, Elim has the staff structure and facilities to ensure the On Site manager and other worker's safety at work, by either supporting the staff member by conducting joint visits / utilising the venue's they have across the area to conduct meet clients within.

The Elim Centre is therefore the only economically viable option for an agency in Mendip to be able to offer the services we require to deliver an effective specialised Direct Access Community project given the accommodation and onsite staffing opportunity available and their track record of successfully delivering Rough Sleeper Services for us in the past 3 years. They have offered a proposal to the Council for delivery of the service which officers are satisfied offers good value for money.

The contract procurement rules allow an exemption under certain circumstances. The current situation can be exempted under section 6.3 i of the Contract Procurement rules which allows for the proposed contract related to specialised services or technical equipment where the requested User Department has made a qualitative judgement that the selected supplier is suited to carry out the work or furnish the equipment. The User department must show there is no effective or genuine competition.

The value of the 12 month contract is below the EU limits and as such an exemption can be given.

As explained above – there are no other organisations who could conduct this work and who have services and venues already in place to engage with clients specifically in the Mendip area.

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Any alternative options considered and rejected	1. Tendering This would be difficult since there are no other agencies in Mendip which have the opportunity to offer an annual contract including 12 month rental of a premises in a rural location (given scheme funding availability is only able to be secured annually) with an existing on site, experienced specialist worker to support rough sleepers. Equally there are not other contractors offering this service with these facilities. 2. Using OGC framework. The contractors on this have been reviewed and there is no-one with the required skill/experience/services in place to carry out the work required.	
Financial and personnel implications	None	
Any relevant personal Interest under the Code of Conduct	None	
Reports and Background papers relevant to the decision	Service Proposal documents from Elim Connect centre attached (pdf)	
Date e-mailed to Members incl Scrutiny Board Chair	Tuesday, 11 April 2017	
Date of Publication of Notice	Tuesday, 11 April 2017	
Date Decision comes into force (*see below)	Friday, 21 April 2017	
	The decision detailed above will come into force, and may be implemented, after Publication unless subject to call-in by the Scrutiny Board.	
Signature of Portfolio Holder		
L	Please complete and return to Democratic Services	