Report to: STRATEGIC COMMISSIONING BOARD

**Date:** 24 July 2019

Reporting Member / Officer of Strategic Commissioning Board

Councillor Eleanor Wills – Executive Member , Adult Social Care and Population Health

Stephanie Butterworth - Director of Adult Services

Subject: NEW SUPPORTED LIVING SCHEMES – ACCOMMODATION FOR PEOPLE WITH A LEARNING

**DISABILITY** 

**Report Summary:** 

The demand for supported living schemes in Tameside is now outstripping supply – there are currently 11 people on the waiting list held in Adult Services by its Accommodation Options Group, and there are 7 people identified for transition in the next two years from Children's Services requiring 24 hour support who need to be planned for. In addition, the number of people with a learning disability living in costly out of borough places has increased recently, primarily due to the lack of supported accommodation capacity locally to meet need – there is a real concern that without increasing capacity such costly placements will very quickly become long term and the opportunity to return people to supported living in the borough will be lost.

This report outlines two schemes that have been discussed over the past six months and will be made available for use by Adult Services in the next 3-18 months, subject to approval from Strategic Commissioning Board to progress the two schemes.

Adult Services considers that the savings offered outweighs the loss of flexibility resulting from entering into longer term arrangements for new accommodation schemes.

Recommendations:

- That approval is given to progress two accommodation schemes – Melbourne Street (Stalybridge) and Hart Street (Droylsden) – to increase capacity in the borough for the provision of supported living for adults with a learning disability to live in their own homes.
- 2. That authority is given to the Director of Adult Services to agree terms in consultation with the Borough Solicitor to enter agreements to use two schemes Melbourne Street (Stalybridge) and Hart Street (Droylsden) to deliver 24 hour supported accommodation for people with a learning disability subject to STAR advising on application of the Public Contracts Regulations 2015 before any further work undertaken.
- 3. That approval is given to provide the support in each scheme by the in-house Long Term Support Service.

Financial Implications: (Authorised by the statutory Section 151 Officer & Chief Finance Officer)

Integrated Commissioning Section 75 Fund

Decision Required By

Strategic Commissioning
Board / Executive Cabinet

Organisation
Directorate
Budget Allocation

and

(TBC)

Tameside MBC – Adult Services

The related rent and service charges levied by landlords within tenancy agreements with service users will be financed via housing benefit. However, any related void periods will need to be stringently managed as these will be a cost to the Adult Services revenue budget.

#### **Additional Comments**

It is essential that the recommended accommodation schemes are progressed urgently should approval to do so be granted. As explained in the report the accommodation will support the delivery of an approved Adult Services savings scheme in the current financial year relating to the resettlement of service users currently supported in higher cost out of borough placements and young adults that will transition from Children's Services requiring intensive support. The level of savings to be delivered in 2019/20 is £191,000 increasing to £254,000 in 2020/21.

Alternative proposals to deliver these levels of savings will need to be identified if the provision of the related accommodation is delayed.

**Legal Implications:** 

(Authorised by the Borough Solicitor)

The Council will be committed to long term obligations with the housing providers. This can include financial obligations, for example, where units are stood empty, however, most of the Council's obligations in these types of agreement tend to centre around the Council supporting the occupants with their tenancies and day to day property management, such as fire alarm testing and reporting required repairs, to keep the properties safe and well maintained. There is usually little room in the initial term to bring the agreement to an end, if, for example, the arrangement was not working, however, these agreements generally envisage the parties working together, reviewing the operation of the agreement and resolving any differences. This should support the success of the schemes and mitigate any financial implications.

STAR should separately consider the application of the Public Contracts Regulations 2015 to these transactions.

How do proposals align with Health & Wellbeing Strategy?

The proposal aligns with the Starting Well, Living Well and Ageing Well programmes

How do proposals align with Locality Plan?

The service links into the Council's priorities for People:-

- Help people to live independent lifestyles supported by responsible communities.
- Improve Health and wellbeing of residents
- Protect the most vulnerable

How do proposals align with the Commissioning Strategy?

This supports the 'Care Together Commissioning for Reform Strategy 2016-2020' commissioning priorities for improving population health particularly: - Creating the right care model so that people with long term support needs have the opportunity to build independence skills and reduce dependency on the health and social care system

Recommendations / views of the Health and Care Advisory Group:

This report has not been presented at HCAG

Public and Patient Implications:

Those accessing the service have been identified as having eligible needs under the Care Act 2014

**Quality Implications:** 

The accommodation will support quality outcomes for people to be able to live in their own home

How do the proposals help to reduce health inequalities?

The service delivers whole life support to vulnerable adults including ensuring individuals have access to a healthy lifestyle and routine medical checks

What are the Equality and Diversity implications?

There are no negative equality and diversity implications associated with this report, see the Equality Impact Assessment at **Appendix A**.

What are the safeguarding implications?

There are no safeguarding implications associated with this report. Where safeguarding concerns arise as a result of the actions or inactions of the provider and their staff, or concerns are raised by staff members or other professionals or members of the public, the Safeguarding Policy will be followed.

What are the Information Governance implications?

Personal data relating to the occupants of the properties, as well as in relation to officers of the Council, will be held by the two housing providers. The Council will potentially hold personal data relating to the employees or contractors of the housing providers. The housing providers and the Council must comply with the provisions of the General Data Protection Regulation and the Data Protection Act 1998 in relation to their handling of this data and this will be further underpinned by relevant and appropriate provisions governing the handling of data in the management agreements.

Has a privacy impact assessment been conducted?

A privacy impact assessment has not been carried out.

Risk Management:

It is essential that, with the challenges of tighter budgets in the future and the personalisation of adult social care and with it the exercising of increased individual choice and control, a diverse market across the social care sector is stimulated to meet need. Adopting a strategic approach that works closely with existing and future providers of social care support is essential in supporting delivery within tighter budget controls whilst implementing this exciting policy direction. A change to larger supported living schemes at a time of austerity has the potential to generate significant savings whilst managing growing demand. While there are risks with the schemes in

entering into long term arrangements and in relation to poor service delivery, these will be managed by working closely with the providers and operation of management agreements. These risks also need to be balanced against the risk of not fulfilling statutory and legal duties to provide support services if the quantity of supported accommodation is not increased.

Risks will be identified and managed by the implementation team.

#### Access to Information:

# **APPENDIX A** Equality impact assessment

The background papers relating to this report can be inspected by contacting the report writer, Trevor Tench:

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#### 1. INTRODUCTION

- 1.1 The Council has a proud record of supporting people with a learning disability who have complex needs requiring 24 hours per day support in ordinary housing in both group homes and in larger schemes of self-contained flats. This started in the early 1990s with supporting people to move out of institutional care both from long stay hospitals and local authority hostels into ordinary housing in the community with the support required to meet assessed needs.
- 1.2 The demand for supported living schemes in Tameside is now outstripping supply and there is therefore a need to expand the amount of supported accommodation schemes to meet this. There are currently eleven people on the waiting list held by Adult Services Accommodation Options Group (AOG) along with seven people identified for transition from Children's Services in the next two years all of whom require 24 hour support daily. In addition, the number of people with a learning disability living in costly out of borough placements has increased recently, primarily due to the lack of capacity in services locally to meet need. There is a real concern that without increasing capacity such costly placements will very quickly become long term and the opportunity to return people to supported living in the borough will be lost.
- 1.3 The Council continues to face significant budgetary challenges and has therefore been reviewing its models of service delivery, looking at new and innovative approaches to deliver services whilst reducing the cost of provision significantly. One significant area of service delivery, and therefore adult social care budget, is the delivery of 24 hour supported living for people with a learning disability which has been reviewed over the last five years.
- 1.4 In particular, the provision of support in shared houses in groups of two, three or four people has been subject to a slow revolution with the move to larger schemes of self-contained flats offering 24 hour support to people with complex needs. This has seen the successful introduction of three such schemes at Town Lane, Carlton Springs and Saint Anne's House all three schemes have successfully challenged the need for group living for a number of people who have complex needs delivering some fantastic outcomes and thereby significantly improving the quality of lives of people living for the first time in their own flats.
- 1.5 The growth of larger schemes has in some part been due to some of the issues associated with group living where significant resource is required to support people to live together, particularly where living so closely can lead to disagreements and flash points that require careful and timely responses to managing arguments and personal behaviours. To mitigate this risk it is often the case that double cover is put in place to ensure safety for all concerned, i.e. co-tenants and staff. Larger supported accommodation schemes allow the delivery of support to meet assessed needs appropriately, and deliver savings over group living schemes as economies of scale allow lower unit costs.
- 1.6 Adult Services constantly reviews the accommodation it uses to provide support to people and has over the past 12 months recognised that a number of properties currently being used are no longer fit for purpose and do not match the ambition Adult Services has for the people it supports. The Accommodation Options Group (AOG) has identified some ten properties currently that are no longer fit for purpose and provide some compromise in maximising outcomes for individuals. Not all the people living in group homes need to remain living in group situations and are ready, with the appropriate support, to move into their own self-contained accommodation in larger schemes with access to 24-hour support.
- 1.7 Based on the success of larger supported living schemes comprising individual flats developed initially across adult social care groupings Adult Services have been looking at opportunities to apply this approach further, delivering the benefits of self-contained accommodation for people, increasing the capacity of accommodation in the Borough to

meet needs locally, and exploring the potential to make significant savings. In addition, where it is clear that service users benefit from being supported in group living situations, options are being explored to replace housing stock that is no longer fit for purpose with new properties that will support people's needs in the longer term.

#### 2. PROPOSAL

- 2.1 Based on the need to increase capacity to meet existing and future need as outlined in Section 1 of this report, it is proposed that in increasing the accommodation needs of the existing and future learning disability population in Tameside that new schemes of self-contained flats in larger schemes and fit for purpose group homes be sourced.
- 2.2 The ambition of Adult Services is to seek modern accommodation, either existing property built within the last ten years or totally new build schemes that meet existing and future needs. No longer should the service compromise its ambition for the people it supports by accepting properties that are simply just "good enough" to provide a short-term solution to prevalent pressures rather than developing long term answers that provide "homes for life".
- 2.3 Discussions are ongoing with a number of providers in relation to accommodation needs of all adult groups, but in relation to supported accommodation for people with a learning disability two schemes have emerged over the past six months that fit the ambition of Adult Services, namely:
  - A scheme of up to 14 self-contained flats at 28-36 Melbourne Street in the centre of Stalybridge that will be owned and offered through the local provider "Homes for Life".
  - A scheme of 5 new build self-contained flats that will be developed on a plot of land on Hart Street in Droylsden – this accommodation will be managed and run by Care Housing Association.

## Homes for Life - Stalybridge Scheme

- 2.4 Homes for Life is a Limited Company owned and operated by Michael and David Cowell with whom the Council has worked successfully in a number of smaller supported housing schemes along with a larger a block of self-contained flats in Town Lane, Denton.
- 2.5 The proposal is that Homes for Life will acquire an existing development with 14 self-contained flats in the one building located in the centre of Stalybridge town centre (28-36 Melbourne Street) which will then be made available to the Council for use by people with a learning disability. Homes for Life have indicated that this accommodation can be made available within the next 3 to 6 months.
- 2.6 It is proposed that the Council would be allocated the whole building and this arrangement will be covered by a Management Agreement this will be based on similar arrangements currently in place between the Council and Homes for Life in relation to the supported living scheme at Town Lane in Denton. The individual flats will be covered by individual tenancies between Homes for Life as the landlord and the people supported by the Council who will be direct tenants.
- 2.7 The flats were built within the last 10 years and would provide a very good standard of accommodation for the target service user group.
- 2.8 It is proposed that support in the scheme will be delivered by the in-house Long Term Support (LTS) Service which has experience of successfully delivering larger schemes of self-contained accommodation in the borough.
- 2.9 Using previous knowledge on similar schemes at Beaumont House and Carlton Springs which are operated by the LTS Service this project will not fall into the "care home" category

as each service user has a tenancy for their own individual flat. A fire risk assessment will be devised with the landlord for each flat and normal fire evacuation procedures will be adopted to get people out of their flats in the case of a fire in the building.

## Care Housing Association – Hart Street, Droylsden

- 2.10 Care Housing Association do not currently operate any properties in Tameside, but have been working with a local building firm to deliver a new build scheme on Hart Street in Droylsden. Care Housing develops supported living properties across England for vulnerable people, work on a not-for-profit basis within the social housing sector and seeks to provide accommodation and housing management services. As a Registered Provider (RP) with the Regulator for Social Housing they aim to continue to develop happy, sustainable homes for the benefit of vulnerable people and help them increase their quality of lives by promoting choice, individuality and independence.
- 2.11 It is proposed that the Council would be granted 100% nomination rights for this new build property of five flats, and this arrangement will be covered by a Management Agreement which has been produced with support from colleagues in Legal Services as part of the ongoing discussions on this project. The individual flats will be covered by individual tenancies between the tenants and Homes for Life as the landlord.
- 2.12 The flats will be built in the next 12-18 months and from discussion on the plans will provide a very good standard of accommodation for the target service user group.
- 2.13 The proposal again is that the support in the scheme will again be delivered by the in-house LTS Service. The scheme will build further capacity in the borough to potentially meet the demand currently identified.
- 2.14 As with the above scheme this project will not fall into the "care home" category as each service user will have a tenancy for their own individual flat. A fire risk assessment will be devised with the landlord for each flat and normal fire evacuation procedures will be adopted to get people out of their flats in the case of a fire in the building

#### 3 VALUE FOR MONEY

- 3.1 These two schemes have been identified as part of wider plans to build supported living capacity to support people to live in their own homes in the borough.
- 3.2 The schemes will house a number of people identified to return from costly out of borough placements who are the subject of one of the current Adult Services saving schemes for 2019-20. The particular target will be to resettle a number of people back to the borough, and deal with some of the existing waiting lists held by AOG.
- 3.3 This particular savings scheme is dependent on the provision of new accommodation to meet the targets set, and it is important to note that the accommodation offered is the first that has become available in the 12 months that this savings project has been worked on.
- 3.4 The additional accommodation outlined is therefore critical in delivering the £191,000 savings proposal in 2019/20 (increasing to £ 254,000 in 2020/21) identified in relation to resettling people back to the borough from costly out of borough placements.
- 3.5 Supporting people in larger schemes of self-contained flats not only offers better quality independent living for individuals, it allows the delivery of 24 hour support in a far more cost-efficient way, and is certainly far more cost effective than being placed in high cost residential placements out of borough.

3.6 The additional capacity supporting more people in the borough will require more staff – new jobs will therefore also be created locally, and the people being supported will be spending their income in the local areas of Stalybridge and Droylsden.

## Homes for Life - Melbourne Street, Stalybridge

- 3.7 Homes for Life are in the process of purchasing the property in Stalybridge Town Centre and given the outlay are looking for an initial agreement for up to twenty years an agreed break clause at ten years has yet to be agreed as discussions are at an early stage. This will be in line with the agreement reached with the Council on the other larger property of self-contained flats owned by Homes for Life at Town Lane in Denton.
- 3.8 The rent for the flats will be set at the current rate for the flats at Town Lane which stand at £191 per flat per week. In consultation with the Council's Property Management Team this level of rent, whilst at the higher end, is not unusual where supported accommodation is being made available for people with a learning disability. The rents at Town Lane have been consistently met by Housing Benefit throughout the life of the scheme.
- 3.9 As the Council will be providing a housing management function at the proposed scheme service charges will be added to the rent schedule to fund the additional work required in recognition of the delivery of these duties such charges will be in line with those currently levied by the Property Management Team on similar schemes they operate.
- 3.10 Care Housing Association Hart Street Droylsden Care Housing Association, working with their builder locally, are in the final stages of progressing the development of the new build five flat scheme on land at Hart Street in Droylsden. They are looking for an initial agreement with the Council for up to ten years but there will be available an option to break at 6 years
- 3.11 The rent for each flat will be set at £150.25 per week, with services charges for housing management activity set at £87.69 on top of this. The total weekly rent for each flat will therefore be £241.64. Again, in consultation with the Council's Property Management Team confirmation has been given that such rent levels are comfortably achievable where supported accommodation is being made available for people with a learning disability.
- 3.12 Care Housing Association will provide the housing management function at the property so the rents and service charges will be directed in their entirety. The Council will be liable to cover the cost of any voids (i.e. empty units), however, this is considered to be a low risk because of the demand for the accommodation.

## 4 ALTERNATIVES CONSIDERED

- 4.1 There are three main options moving forward:
  - Close the service
  - The "do nothing" approach
  - Expand the portfolio of accommodation to meet existing and future needs of the learning disabled population in Tameside.

#### **Service Closure**

4.2 The service user group is largely people with a learning disability who have complex needs and who will need intensive support for the remainder of their lives. The number of people who need this service is increasing as a result of young people moving out of Children's Services, lack of accommodation capacity forcing an increased number of people being placed in costly accommodation, and increased life expectancy of this group as a result of advances in health care and other technology. Any cessation of this service would be likely

to result in support having to be provided in individual properties or via institutional accommodation. In both cases this is likely to be more expensive. As a result it is simple to conclude that closure of the service is not desirable and unlikely to be popular or viable.

## "Do Nothing" Approach

- 4.3 This would mean that Adult Services would continue to deliver support people in the existing accommodation stock. However, this means that service users who are in need of accommodation will be reliant on tenancies becoming available in that stock. Vacancies in group homes can take some considerable time to fill given the detailed compatibility work required between the existing tenants and the person being referred filling individual flats can be done very quickly hence the preference to develop larger schemes of self-contained flats rather than group homes.
- 4.4 Given the existing demand being experienced from children going through transition to adult services, increasing demand from people coming into the service where long-term family support has broken down, and people living longer the "do nothing" approach means that the Council will become increasingly reliant on costly out of borough residential places. Not only would this be a poor response for those users who find themselves in the position that the only option is for them to move to a residential placement outside of the area that they have been brought up in, it would be financially very difficult for the Council given the excessive cost of out of borough placements.
- 4.5 With the increasing demand for accommodation, legislation directing people to be supported to live in their own homes for as long as possible, and the financial efficiency of supporting people to live in the borough rather than in expensive residential placements away from the locality –as a result the option to do nothing is not a viable one.

### **Expansion of Available Accommodation**

- 4.6 There is a clear need to increase the amount of supported accommodation to meet the pressure of demand currently which will grow in the coming years, particularly with the young people transitioning to adult services.
- 4.7 In addition to meeting current and increasing demand, ten properties currently being used in Adult Services are not fit for purpose and need replacing.
- 4.8 The two schemes will enable the resettlement of a number of people from out of borough placements and put much needed additional capacity into the borough.

#### **5 EQUALITIES**

5.1 It is not anticipated that there are any negative equality and diversity issues with this proposal, see EIA available at **Appendix 1** to the report.

### **6 RISK MANAGEMENT**

- 6.1 Any risks of poor service delivery will be mitigated by close monitoring of the service by close working relationships between officers representing the Council and the two accommodation providers to ensure that the agreements are being fully met and that subsequently people accessing the accommodation enjoy the agreed quality of accommodation.
- 6.2 There is a significant risk that not expanding the quantity of supported accommodation available for people with a learning disability to meet growing demand will mean that the Council would not fulfill its statutory and legal duty to provide support services in appropriate settings in a homely environment whilst meeting eligible needs.

- 6.3 There is a risk in the Council entering long term arrangements surrounding the two schemes. The justification for entering into longer term commitments on these two schemes is to reflect the ambition of Adult Services to source modern accommodation, either existing property built within the last ten years or totally new build schemes that meet existing and future needs alongside wherever possible offering "homes for life". Schemes such as these two offer opportunities to deliver significant savings and going forward operate at the optimum level of financial efficiency in supporting people with complex needs requiring 24 hour support in their own homes. The Council is clear that this very vulnerable group of people, who are increasing in numbers, will require support for the rest of their lives the modern high quality accommodation proposed will allow people to live in their own self-contained living space rather than shared arrangements that in the majority of cases wouldn't be their chosen living arrangement.
- There is a financial risk to the Council in relation to covering any voids, however, this risk is mitigated by the demand for the accommodation as set out above. These types of agreement also tend to give rise to a financial liability for the Council upon the happening of certain events e.g. damage to the property by an occupant where the cost of repair is not recoverable from the occupant. Such risks should be managed through close working with the providers and through support from LTS.

#### 7 CONCLUSION

- 7.1 This report seeks approval to progress the two accommodation proposals in the centre of Stalybridge and at Hart Street in Droylsden both schemes will delivering high quality self-contained living environments offering the opportunity to deliver cost effective services for people requiring long term 24 hour support.
- 7.2 The two schemes will support the delivery of £191,000 as part of the Adult Services savings proposal in 2019/20, increasing to £ 254,000 in 2020/21.
- 7.3 In supporting progression of these two schemes the Council is making a strong commitment to meeting the needs of people with a learning disability by prioritising the continuation of the provision of 24 hour supported living service.

## 8 **RECOMMENDATIONS**

8.1 As set out on the report cover.

## **APPENDIX A**

## **Equality Impact Assessment**

Subject / Title	New Supported Living Schemes – Accommodation for
Subject / Title	People with a Learning Disability

Team	Department	Directorate
Joint Commissioning and Performance Management	Adults	Adults

Start Date	Completion Date
7 May 2019	7 May 2019

Project Lead Officer	Trevor Tench
Contract / Commissioning Manager	Denise Buckley, Giovanna Surico-Hassall
Assistant Director/ Director	Stephanie Butterworth

EIA Group (lead contact first)	Job title	Service
Trevor Tench	Head of Commissioning	Adult Services – Commissioning and Performance
Denise Buckley	Contracts and Commissioning Officer	Adult Services – Commissioning and Performance
Giovanna Surico-Hassall	Team Manager	Operations – Adult Services
Adam Lomas	Assistant Team Manager	Operations – Adult Services

# PART 1 - INITIAL SCREENING

An Equality Impact Assessment (EIA) is required for all formal decisions that involve changes to service delivery and/or provision. Note: all other changes – whether a formal decision or not – require consideration for an EIA.

The Initial screening is a quick and easy process which aims to identify:

- those projects, proposals and service or contract changes which require a full EIA by looking at the potential impact on, or relevance to, any of the equality groups
- prioritise if and when a full EIA should be completed
- explain and record the reasons why it is deemed a full EIA is not required

A full EIA should always be undertaken if the project, proposal and service / contract change is likely to have an impact upon, or relevance to, people with a protected characteristic. This should be undertaken irrespective of whether the impact or relevancy is major or minor, or on a large or

small group of people. If the initial screening concludes a full EIA is not required, please fully explain the reasons for this at 1e and ensure this form is signed off by the relevant Contract / Commissioning Manager and the Assistant Director / Director.

1a.	What is the project, proposal or service / contract change?	The proposal is enter into agreements for two new supported living schemes in Stalybridge and Droylsden to meet the current demand for accommodation for people with a learning disability	
1b.	What are the main aims of the project, proposal or service / contract change?	Droylsden to meet the current demand	

1c. Will the project, proposal or service / contract change have either a direct or indirect impact on, or relevance to, any groups of people with protected equality characteristics?

Where there is a direct or indirect impact on, or relevance to, a group of people with protected equality characteristics as a result of the project, proposal or service / contract change please explain why and how that group of people will be affected.

Protected Characteristic	Direct Impact/Relevance	Indirect Impact/Relevance	Little / No Impact/Relevance	Explanation
Age	✓			The service is for adults 18+.Those under 18 will have access to care and support via children's services
Disability	✓			The service is for adults with a learning disability. Adults who do not have a learning disability will access adult services if they have an eligible need as per the Care Act 2014

Ethnicity		✓	
Sex		<b>✓</b>	
Religion or Belief		<b>√</b>	
Sexual Orientation		<b>√</b>	
Gender Reassignment		<b>√</b>	
Pregnancy & Maternity		<b>√</b>	
Marriage & Civil Partnership		<b>√</b>	

# Other protected groups determined locally by Tameside and Glossop Strategic Commission?

Group (please state)	Direct Impact/Relevance	Indirect Impact/Relevance	Little / No Impact/Relevance	Explanation
Mental Health				Service users may have a secondary mental health support need in addition to their learning disability. Individuals whose primary need is mental health, will access other appropriate services
Carers	✓ ·		✓	The service supports carers to plan the long term needs of the person they support along with crisis support
Veterans			•	
Breast Feeding			✓	

Are there any other groups who you feel may be impacted by the project, proposal or service/contract change or which it may have relevance to?

(e.g. vulnerable residents, isolated residents, low income households, those who are homeless)

Group (please state)	Direct Impact/Relevance	Indirect Impact/Relevance	Little / No Impact/Relevance	Explanation
N/A				

Wherever a direct or indirect impact or relevance has been identified you should consider undertaking a full EIA or be able to adequately explain your reasoning for not doing so. Where little / no impact or relevance is anticipated, this can be explored in more detail when undertaking a full EIA.

1d.	Does the project, proposal or service / contract change require	Yes	No
	a full EIA?		<b>✓</b>
1e.	What are your reasons for the decision made at 1d?	The increased provision of accommodation will allo access to appropriate provision, offer more choice and control over the support individuals need improve and better manage their wellbein contributing to improved experiences and outcome. The service is open to anyone who meets the criteria	