

Report of the Assistant Chief Executive (Citizens and Communities)

Report to Executive Board

Date: 22nd June 2016

Subject: Community Hubs - Phase 2 Business Case

Are specific electoral Wards affected?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, name(s) of Ward(s): Armley, Bramley & Stanningley, Pudsey, Gipton & Harehills, Headingley, Hyde Park & Woodhouse, Otley and Yeadon, Horsforth, Chapel Allerton, Alwoodley/Moortown, Middleton Park, Killingbeck & Seacroft, Kippax & Methley, City & Hunslet, Morley South, Rothwell,		
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, Access to Information Procedure Rule number: 10.4(3) Appendix number: A		

Summary of main issues

- Executive Board have received a number of reports which have established and reported progress on the delivery of the work being progressed to address poverty and deprivation across the city. Four propositions were agreed by members, brought together under the banner of Citizens@Leeds, in order to achieve the following outcomes:
 - providing more accessible and integrated services
 - helping more people out of financial hardship
 - helping more people into work
 - being responsive to the needs of local communities..
- As part of the accessible and integrated services proposition, three pathfinder community hubs have been in operation from April 2014 and form Phase 1 of the development of Community Hubs. Members received a subsequent report on developing the Community Hub model on a city wide basis in October 2014. This report set out a number of recommendations including the following:
 - Approve the adoption of a city-wide community hub model that sees a network based approach, developed in partnership with Community Committee's and local ward councillors, and supported by a city centre community hub.

- Approve the proposal to bring together all existing community based one stop centres, libraries and housing management offices to be managed as a single set of front-of-house services, to enable the development of a city-wide network of community hubs.
3. Executive Board received a further report on 15th July 2015 outlining progress to date in delivering these recommendations and further to this, were asked to authorise the Assistant Chief Executive (Citizens and Communities) to develop a Business Case for building/infrastructure changes for Phase 2 of Community Hubs.
 4. This report sets out the Phase 2 business case and costs to allow the continued roll out of the Community Hubs with fully integrated services across the city including, asset rationalisation, co-location of housing back offices, essential backlog maintenance and new Changing the Workplace ICT infrastructure and equipment to enable new ways of working.
 5. The report also provides an update on the progress in delivering Phase 1a Community Hubs at six sites across the city – Yeadon, Kippax, Horsforth, Moor Allerton, Pudsey and Rothwell.

Recommendations

6. Executive Board are requested to :-
 - Note the contents of the report and specifically the progress made on delivering the Phase 1a Community Hubs
 - Support the delivery of the Phase 2 of Community Hubs schemes.
 - Note the contributions of £600k from the Changing the Workplace and Corporate Property Management programmes already injected into the capital programme and authorise an additional injection of £4,017.4k to finalise the total funding needed of £4,617.4k for phase 2 of the Community Hubs programme.
 - Authorise expenditure of £4,617.4k for the delivery of phase 2 of the Community Hubs programme subject to the approval of the Assistant Chief Executive (Citizens and Communities) to individual submission of business cases for delivering each part of the Phase 2 Community Hub programme.
 - Authorise the disposal of the properties, as set out in the capital receipt section of confidential appendix A in the report.
 - Approve the use of the revenue savings expected from the proposed asset rationalisation and delivery of the Community Hubs, as set out in 6.4.9, to contribute to the capital repayment cost required to deliver the Phase 2 Community Hub programme.

Main Report

1 Purpose of this report

- 1.1 For Members to note progress made to date on the Community Hub programme and specifically the delivery of the six Priority 1a schemes.
- 1.2 To agree the Phase 2 Community Hub schemes that will require refurbishing to form Hubs in a number of key local buildings, mainly existing Libraries and One Stop Centres to support the delivery of integrated and accessible services.
- 1.3 To agree asset rationalisation proposals arising from the consolidation of services and integration of back offices, which enables disposal of vacant council buildings.
- 1.4 To seek approval for the overall funding injections and authority to spend to enable the delivery of the Community Hub Phase 2 programme.

2 Background information

- 2.1 Executive Board have received a number of reports, which established and reported progress on the delivery of the work being progressed to address poverty and deprivation across the city. Four propositions were agreed by members, brought together under the banner of Citizens@Leeds, in order to achieve the following outcomes:
 - providing more accessible and integrated services
 - helping more people out of financial hardship
 - helping more people into work
 - being responsive to the needs of local communities.
- 2.2 In order to deliver these required outcomes, a Phase 1 - Community Hubs project delivered some initial works to provide three 'Pathfinder Community Hubs' at the Compton Centre in Harehills, the St George's Centre in Middleton and the One Stop Centre in Armley. These have now operated since April 2014.
- 2.3 Following the success of the Pathfinder Hubs, Members received a subsequent report on developing the community hub model on a city wide basis in October 2014 and it was agreed to:
 - adopt a city-wide community hub model that sees a network based approach, developed in partnership with Community Committee's and local ward councillors, and supported by a city centre community hub.
 - the proposal to bring together all existing community based one stop centres, libraries and housing management offices to be managed as a single set of front-of-house services, to enable the development of a city-wide network of community hubs.
- 2.4 To help achieve this, from 1st April 2015, 32 Community Libraries, 7 Job Shops and 210 members of staff from those services transferred to the Citizens and Communities Directorate. These add to the existing network and workforce of 17 One Stop Centres. The mobile library service also transferred on the 1st March 2016.

- 2.5 On the 9th May 2016, Citizens and Communities commenced taking housing enquiries from the new Phase 1a Hubs in Horsforth, Kippax, Moor Allerton and Pudsey with housing enquiries to be taken from Rothwell by the end of June 2016. As a result of this 4 Neighbourhood Housing Offices in these areas will close under Phase 2 with housing back office staff being relocated to join hubs or adjacent buildings, where possible. The remainder will be considered as part of a Phase 3 programme in 2017/18.
- 2.6 Executive Board received a further report on 15th July 2015 outlining progress to date in delivering these recommendations (set out in 2.3 above) and authorised the Assistant Chief Executive (Citizens and Communities) to develop a business case for building/infrastructure changes for Phase 2 of Community Hubs.

3 Key Messages

- 3.1 Community Hubs continue to make a real difference for local communities, changing people's lives and enabling us to deliver more and better services at the same or lower cost.
- 3.2 The 10 operational Community Hubs continue to develop real integration with a wide range of services and partners including police, health, credit union and the third sector and are providing better outcomes for local people, including helping more people into work.
- 3.3 The Phase 2 programme will see the development of our Community Hub 'Extra', 'Local' and 'Mobile' approach extend to a further 10 sites during the next 12 months.
- 3.4 We will also develop proposals for Phase 3 over the next 12 months to extend the Community Hub approach across the whole city over the next 18-24 months.

4 Main issues

- 4.1 The delivery of the Community Hubs is split into multiple phases due to the scale of the programme and to accelerate delivery, as follows:
- 4.2 Phase 1 Pathfinder sites - Armley, Compton Centre and St George's Centre. These opened in April 2014.
- 4.3 Phase 1a Priority Sites – Initial works have been undertaken to allow Integrated Library and One Stop services to be formed at the Priority 1a sites using revenue funding from Citizens & Communities Directorate. Housing Leeds are funding the works to enable an integrated back office to be formed at three of the Hubs, to enable the merger of housing and hub staff and this will be completed by Summer 2016. Further information on each of the Phase 1a sites is included in the table below.

Community Hub	Location	Works/Property Saving/Impact
Yeadon Community Hub	Yeadon Library	Opened in Summer 2015. Community Hub formed in Yeadon Library. Aireborough One stop moved into new Yeadon Hub. Micklefield House declared surplus to requirements and

		disposal agreed at Executive Board in November 2014.
Kippax Community Hub	Kippax Library	Community Hub formed in Kippax Library. New One Stop Service including housing enquiries provided from Hub due to integration of Housing Management Office. Housing back office moved to Kippax leisure centre. Kippax Neighbourhood Housing Office declared surplus to requirements and proposed for disposal.
Moor Allerton Community Hub	Moor Allerton Library	Community Hub formed in Moor Allerton Library. New One Stop Service including housing enquiries provided from Hub due to integration of Housing Management Office. Housing back office co-located in new hub. Properties formerly used to house the Moortown Housing Office will be returned to rentable accommodation.
Pudsey Community Hub	Pudsey Library	Community Hub formed in Pudsey Library. Move One Stop into Library. Space vacated in Pudsey Town Hall will be occupied as office space for Integrated Health and Social Care Teams.
Horsforth Community Hub	Horsforth Library	Community Hub formed in Horsforth Library. New One Stop Service including housing enquiries provided from Hub due to integration of Housing Management Office. Housing back office co-located into new hub. The buildings housing Horsforth Housing Office now predominantly vacant with only one tenant. Future solution for the tenant to be discussed further, but in principle the assumption is made that the tenant will come out of the building to enable its disposal.
Rothwell Community Hub	Rothwell Library	Community Hub formed in Rothwell Library. Move one stop service from Rothwell Area Office. Housing back office co-located into new hub. Rothwell Area Office declared surplus to requirements and passed to Asset Management for determination of the building's future use or disposal.

4.4 Phase 2 Community Hubs - Alongside the Phase 1 and Phase 1a schemes outlined above, work has been ongoing to identify a further 12 sites for development within Phase 2.

4.5 The Community Hubs refurbishment and conversion works for these sites will include creating library areas, one stop facilities, jobshop, interview rooms, hotlines, Wi-Fi, meeting rooms, social spaces, customer toilets, waiting areas and queue management

systems at the larger hubs to enable fully integrated services to be delivered to customers.

4.6 Back Office areas will be improved in line with Changing the Workplace to meet 'new ways of working' standards, including provision of laptops and ICT equipment to enable services to be co-located.

4.7 Condition surveys, identifying back-log maintenance and accessibility issues, have been carried out on the Phase 2 Community Hub buildings. Costs for immediate and essential maintenance works have been included and will be completed under the Phase 2 programme. Further routine and planned maintenance has been excluded from the programme.

4.8 The Phase 2 community hub proposals and information relating to the release of some assets are set out below:

Phase 2 Hubs	Location	Works/Property Saving/Impact
Dewsbury Road Community Hub	Dewsbury Road One Stop Centre	Community Hub formed in Dewsbury Road One Stop Centre. Move Library and ICT Suite into One Stop to form Community Hub. Improve layout, design and confidentiality issues on ground floor and add queue and appointment management. Improve layout of office space to increase number of workstations and move housing staff and other services into office space on first floor. It is currently proposed that the existing Library will be occupied by Children's Services.
North Seacroft Community Hub	Deacon House	New Community Hub formed in Deacon House. Move existing Library, One Stop Centre and housing back office. Conversations are ongoing with the Post Office about relocating to Deacon House. Purchase of Deacon House (under separate report to Executive Board 18/11/2015) supported by termination of existing One Stop/NHO Lease and disposal of existing Library building site.
Morley Community Hub	TBD	Options are being developed for the Community Hub in Morley. Agreement on the preferred solution for development to be delegated to the Assistant Chief Executive (Citizens and Communities) in consultation with the Executive Member for Communities and Local Ward Members.
Middleton Community Hub	St George's Centre	Community Hub formed in St George's One Stop Centre. Further works needed

		to improve layout, design and confidentiality issues on ground floor and add queue and appointment management. Alterations needed to form additional office space to increase number of workstations to move services into office space on first floor and ground floor.
Bramley Community Hub	TBD	Options are being developed for the Community Hub in Bramley. Agreement on the preferred solution for development to be delegated to the Assistant Chief Executive (Citizens and Communities) in consultation with the Executive Member for Communities and Local Ward Members. However for the purposes of costing the business case it has been assumed that at least 1 property will be released for disposal.
Chapelton Community Hub	The Reginald Centre	Minor works required to counter, social zone and additional ICT area.
Headingley Community Hub	Headingley Library	Community Hub formed in Headingley Library. New One Stop Service including housing enquiries provided from Hub. The disposal of Burley library (closed on health and safety grounds and re-provisioned through the mobile library service) is assumed within the business case.
Harehills Community Hub	The Compton Centre	Minor works required to social zone, refreshed waiting area and queue & appointment management.
Otley Community Hub	Otley Library and One Stop Centre	Minor works to interview rooms, social zone and improved ICT area
Armley Community Hub	Armley Library and One Stop Centre	Improve layout, queue & appointment management, design and confidentiality issues.
Garforth Community Hub	Garforth Library and One Stop Centre	Minor works to social zone and improved ICT area.
City Centre Hub	2GGS then move to Merrion House	Queue and appointment management.

4.9 The Council's internal building contractor has carried out the works to Phase 1 and 1a and it is proposed that they also deliver the Phase 2 Hub programme. All works to Phase 2 Community Hubs will commence summer 2016 on multiple sites, subject to approval by Executive Board. A fully detailed phasing plan and programme of works will be produced following approval. It is anticipated that the Phase 2 programme will be completed by autumn 2017.

4.10 Phase 3 Community Hubs – There are another potential 24 sites across the city that need to be considered under a Phase 3 Community Hubs programme, which are made up of the remaining Libraries, One Stop Centres, and NHO buildings. A further business case will be presented to Executive Board for the Phase 3 sites by the end of the 2016/17 financial year.

5 Positive progress and commitment to Phase 2

- 5.1 Evidence from the existing Pathfinder Community Hubs identifies that there is considerable customer satisfaction both with being able to access services locally and retaining a valuable local resource in respect of the library.
- 5.2 Although information is anecdotal at present, the developing Priority 1a schemes have met with generally wide-spread support from the communities and local ward Members.
- 5.3 The developing network of Community Hubs puts Leeds City Council in a better position to handle the changing nature of our face to face to work. The impact of welfare reform, universal credit and the changing nature and make-up of local communities mean that flexible, locally based services, able to adapt to changing needs, are essential if we are to have a real and positive effect on our citizens.
- 5.4 The Community Hubs are also best placed to develop shared services, developing links with local employers, encouraging the move into work, making people “work ready”, and providing help, guidance and training as more and more government services and benefits go on-line.

6 Corporate Considerations

6.1 Consultation and engagement

- 6.1.1 The Citizens and Communities Scrutiny Board undertook an inquiry into the development of Community Hubs this year. In doing so, the Scrutiny Board assisted the Citizens and Communities directorate in evaluating the strengths and weaknesses of the pathfinder Community Hubs from a buildings and infrastructure perspective and engaged with a wide range of witnesses, including existing ‘front of house’ staff. This inquiry concluded in March 2016 and the Scrutiny Board agreed and published its final report in May 2016 setting out its conclusions and recommendations aimed at informing future phases for the roll out of the Community Hub network ([click to access the Scrutiny inquiry report](#)). These recommendations have been used where appropriate to inform the development of this business case.
- 6.1.2 Ward members in all wards affected by Phase 2 schemes have been consulted on the Community Hub proposals and are broadly supportive of the programme.
- 6.1.3 The Council’s Asset Management Board has provided their support to the Community Hub Programme and Phase 2 Asset Rationalisation proposals.
- 6.1.4 The Councils Strategic Investment Board has provided their support to the Community Hub Programme and Phase 2 Asset Rationalisation proposals at their meeting on 27th April 2016.

6.2 Equality and Diversity / Cohesion and Integration

- 6.2.1 As per previous reports, there are clear links between poverty and inequality of outcomes in relation to education, employment, health and life expectancy and the accessible and integrated services proposition is focussed on ensuring that citizens and communities can access services in the simplest way for them whilst ensuring that the council and its partners response to help citizens and communities is integrated and joined up so that access is as equal as possible.
- 6.2.2 With regard to the development of the Phase 2 community hubs, whilst all known inclusions and diversity requirements have been built into the presented costs, an Inclusion and Diversity policy, plus linked access strategy for our workplaces, is currently being developed for approval at Executive Board. It is possible there will be additional requirements arising from this work for the community hubs.
- 6.2.3 An Equality, Diversity, Cohesion and Integration Screening has been carried out and is attached as Appendix B. The screening demonstrates how the impact of the proposals on equality, diversity, cohesion and integration have been considered and outlines the actions that have been taken / are being taken to mitigate the impact.
- 6.2.4 The key points of the screening illustrate the positive impact the community hub developments have on resolution at first point of contact, accessibility, welfare benefits & poverty, social exclusion, reading and lifelong learning, tailoring services to local communities.

6.3 Council Policies and the Best Council Plan

- 6.3.1 Addressing poverty and deprivation, helping people into work and tackling social isolation are key priorities for the Council and make a significant contribution to our Strong Economy and a Compassionate City agenda as set out in the Best Council Plan 2016/17. The activities set out in this report contribute to the delivery of the Best Council Plan outcomes for everyone in Leeds to 'Earn enough to support themselves and their families' and this year's Best Council Plan priorities around 'supporting economic growth and access to economic opportunities', 'providing skills programmes and employment support' and 'helping people adjust to welfare changes'. The Citizens@Leeds agenda also plays a key role in supporting delivery of the Safer and Stronger Communities Plan, the Children's and Young People's Plan, the Child Poverty Action Plan and the Leeds Joint Health and Wellbeing Strategy all of which have a strong focus on addressing debt, maximising income through helping people into work, moving people and families out of poverty and providing facilities and services which help address social isolation.

6.4 Resources and Value for Money

- 6.4.1 In considering the financial implications of the proposals within this report, Members need to consider a range of issues. The overall development of Community Hubs (phases 1, 1a, 2 and 3) will ultimately need to be considered in their entirety to fully understand and assess the overall financial implications of the development of Community Hubs. Financial implications can essentially be broken down into four areas:

- Capital investment requirements to deliver new services and invest in buildings to be retained
- Capital receipts from the disposal of buildings declared surplus
- Revenue savings contained with agreed budgets
- Property based revenue savings arising from vacating buildings

6.4.2 As regards capital investment, phases 1 and 1a have been delivered within existing revenue resources with no recourse to new capital investment. However, the nature of phase 2 developments require capital investment to deal with the following costs:

- Works needed to create the front of house Community Hub
- Backlog Maintenance (immediate and urgent maintenance only)
- Costs of the relocation of Neighbourhood Housing Offices
- ICT equipment to facilitate new ways of working within localities.

6.4.3 The following table summarises the level of capital investment required for phase 2 community hub developments:

	Total	Phase 2	ICT	Housing & Back Offices	Backlog Maintenance
Total Capital Spend	£4,617k	£2,298k	£959k	£685k	£675k

6.4.4 In regard to capital receipts, the proposed asset rationalisation proposals arising from the specific proposals set out in this paper are set out in confidential appendix A and include the proposed disposal of a number of surplus assets. Executive Board are requested to authorise the disposal of the assets set out in the confidential appendix to enable delivery of this programme.

6.4.5 The following table summarise the capital investment required and cashflow:

Authority to Spend required for this Approval	TOTAL £000's	TO MARCH 2016 £000's	FORECAST					
			2016/17 £000's	2017/18 £000's	2018/19 £000's	2019/20 £000's	2020 on £000's	
LAND (1)								
CONSTRUCTION (3)	3658.0		1829.0	1829.0				
FURN & EQPT (5)	959.4		479.7	479.7				
DESIGN FEES (6)	0.0							
OTHER COSTS (7)	0.0							
TOTALS	4617.4	0.0	2308.7	2308.7	0.0	0.0	0.0	0.0
Total overall Funding (As per latest Capital Programme)	TOTAL £000's	TO MARCH 2016 £000's	FORECAST					
			2016/17 £000's	2017/18 £000's	2018/19 £000's	2019/20 £000's	2020 on £000's	
LCC MRP Departmental Supported Borrowing	600.0		600.0	0.0				
LCC MRP Departmental Unsupported Borrowing	2347.0		873.5	1473.5				
LCC Capital Receipts	1670.4		835.2	835.2				
Total Funding	4617.4	0.0	2308.7	2308.7	0.0	0.0	0.0	0.0
Balance / Shortfall =	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

6.4.6 As regards revenue savings contained within agreed budgets, a number of revenue savings have been achieved as a consequence of phase 1 and 1a developments across the Council. Further savings will be achieved as phases 2 and 3 are taken forward. So, for example, in Citizens and Communities savings amounting to £100k were contained within the 2015/16 agreed budget as a consequence of community hub developments. Similarly, the community hub developments helped achieve a £240k saving in libraries, whilst maintaining or improving library opening hours. In the current year's revenue budget a further £100k saving is included within the agreed revenue budget for community hubs and for the years 2017/18 and 2018/19 revenue savings amount to £420k are currently being projected. There will also be other revenue savings in other budgets across the council as a consequence of these developments. For example, a number of indirect property and associated savings will be achieved as a result of the knock-on effect of delivering the Phase 2 Community Hub programme. Examples of this include Children's Services occupying office space at former Dewsbury Road Library and Integrated Health and Social Care Team occupying office space at Pudsey Town Hall both of which mean space has been release elsewhere within the council's asset portfolio.

6.4.7 As regards property based revenue savings, the asset rationalisation proposals included within the programme provides property savings on fuel, rates and removes any future maintenance requirements.

6.4.8 HRA will be recharged for office space occupied at the community hub sites and the cost of borrowing for the building works required to create the office environment. The remaining savings will be used to fund the borrowing required to fund the remaining development works.

6.4.9 The following table illustrates the specific property based revenue effects on general fund and HRA which will be used to support the capital investment required for phase 2.

GENERAL FUND REVENUE EFFECTS	2016/17	2016/17 and SUBSEQUENT YEARS
	£000's	£000'S
Premises Costs (savings)	-10.0	-51.3
Supplies and Services		28.7
Prudential Borrowing	79.1	158.2
Recharge to HRA	-78.1	-146.2
Net	-9.0	-10.6

HRA REVENUE EFFECTS	2016/17	2016/17 and SUBSEQUENT YEARS
	£000's	£000'S
Premises Costs (Savings)	-68.1	-150.6
Recharge for Office Space	45.0	90.0
Recharge for Prudential Borrowing	23.1	56.0
Net Saving	0.0	-4.6

6.5 Legal Implications, Access to Information and Call In

6.5.1 There are no direct legal implications arising from the recommendations in this report and the report is subject to Call-In.

6.5.2 The information contained in Appendix 1 is exempt under Access to Information Rule 10.4(3) as it contains information relating to the financial or business affairs of any particular person (including the authority holding the information) and contains property valuations for Council buildings which the report proposes are disposed of. It is therefore considered that the public interest in maintaining the content of the appendix as exempt outweighs the public interest in disclosing the information as publication could prejudice potential value of asset rationalisation.

6.6 Risk Management

6.6.1 The key risks associated with the Community Hub Phase 2 programme are principally around the delivery of schemes to costs, time and quality thresholds. To mitigate this, the Citizens and Communities Leadership team will act as Programme Board for Phase 2 and the Assistant Chief Executive (Citizens and Communities) will be asked to agree individual scheme business cases to ensure that the cost, quality and time thresholds are adhered to and that the overall scheme is delivered within the agreed financial allocation.

7 Conclusion

7.1 In order to build upon our the positive progress so far made through the Community Hub development, and to achieve our long-term aims around delivering integrated and accessible service which meet the increasingly complex needs of the citizens and communities of Leeds; it is important that Leeds City Council continues its commitment to Community Hubs through this Phase 2 programme.

7.2 Through this programme the Council will ensure all sites are refurbished and furnished to provide a modern safe environment that treats our customers with respect and encourages contact with Leeds City Council as an organisation that can offer help and assistance.

8 Recommendations

8.1 Executive Board are requested to :-

- Note the contents of the report and specifically the progress made on delivering the Phase 1a Community Hubs
- Support the delivery of the Phase 2 of Community Hubs schemes.
- Note the contributions of £600k from the Changing the Workplace and Corporate Property Management programmes already injected into the capital programme and authorise an additional injection of £4,017.4k to finalise the total funding needed of £4,617.4k for phase 2 of the Community Hubs programme.
- Authorise expenditure of £4,617.4k for the delivery of phase 2 of the Community Hubs programme subject to the approval of the Assistant Chief Executive (Citizens and Communities) to individual submission of business cases for delivering each part of the Phase 2 Community Hub programme.

- Authorise the disposal of the properties, as set out in the capital receipt section of confidential appendix A in the report.
- Approve the use of the revenue savings expected from the proposed asset rationalisation and delivery of the Community Hubs, as set out in 6.4.9, to contribute to the capital repayment cost required to deliver the Phase 2 Community Hub programme.

9 Background documents¹

9.1 None.

¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.