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Report of Head of Commissioning, Adults and Health

Report to Director of Resources and Housing

Date: 26th February 2021

Subject: Extension of contract with Gipsil Limited for the Engage Leeds Service for a three year period in accordance with Contracts Procedure Rule (CPR) 21.1 (contract extensions) and to vary the contract under Modification of Contracts during their Term under Regulation 72 (5) of the Public Contracts Regulations 2015, to include five Navigator posts.

Are specific electoral wards affected? If yes, name(s) of ward(s):	Yes	⊠ No
Has consultation been carried out?	⊠ Yes	□No
Are there implications for equality and diversity and cohesion and integration?	☐ Yes	⊠ No
Will the decision be open for call-in?	⊠ Yes	□No
Does the report contain confidential or exempt information? If relevant, access to information procedure rule number: Appendix number:	☐ Yes	⊠ No

Summary

1. Main issues

- Leeds City Council commissions the Engage Leeds Service as a Visiting Housing Related Support Service supporting up to 1500 clients focusing on themes of preventing homelessness, sustainment of a tenancy and integration.
- Following a competitive procurement exercise the current contract was awarded to Engage Leeds from 1st April 2017, for a period of 5 years to 31st March 2022 with an option to extend for up to 36 months. The annual agreed funding for Engage Leeds is £3,711,750.
- Approval is sought to apply the available contract extension period of 36 months. The service is performing well, is of high quality and continues to meet the original contract aims and objectives to provide a strategically important service that meets the Council's ambitions.
- An opportunity has arisen to fund some additional targeted work as a result of a bid for funding the city has made to the Ministry of Housing Communities and Local Government (MHCLG) for Next Steps Accommodation Programme (NSAP) and Flexible Homeless Grant (FHG).

- The funding will be used to fund five Navigator posts that support people who need
 additional help to settle into accommodation, recover and engage with activities and
 services in their local communities. Three of the Navigators will be funded for a period
 of three years from 1st April 2021 and two further Navigators funded for a period of up
 to 3 years from 1st April 2021.
- It is proposed to invoke all of the three year extension periods that are available for this contract up to 31st March 2025. Implementing the full three year extension period now will mean that from 1 April 2021 there will be four further years of service delivery under the current contractual arrangements. This will allow the employment of the three externally NSAP funded Navigators from April 2021 where funding has been specifically granted for three years. If the decision to extend the contract were to be taken in the last year of the current contract (2021-22) the Provider would not have the assurance presently to recruit to posts for three years.
- The Engage Leeds contract has not had any uplift in the contract value since being procured through the competitive tender process 1st April 2017. Efficiencies can be evidenced throughout the life of the contact. The contract price is primarily for staffing budgets which have increased since the commencement of the contract, however the contract value has not had any financial uplift during this time and furthermore there is no uplift identified throughout the extension period.
- The contract performs well and is a lever for other funds into the City, such as NSAP (Next Steps Accommodation Programme) and FHG (Flexible Homeless Grant).
- The Engage Leeds contract provides support to the most vulnerable people in our City with complex needs. They consistently support more people than the contract quota of 1500 people at any given time.
- Engage Leeds have been a valuable partner throughout the Covid- 19 pandemic as they have flexed the contract to support the rough sleepers and homeless people placed within emergency accommodation during the Covid-19 pandemic.
- The extension will avoid disruption for clients, the service and partnership working across the city. It will ensure that the service will be able to retain and further develop an experienced staff team. It will prevent a dip in performance due to these factors. It will also provide the time for in depth discussions and consultation to take place about what the long term future needs of the city are with regards to housing related support. Contract terms and conditions still enable changes or termination if required, should circumstances change. A second option would be to let the contract lapse at the end of 2021/22. Should this course of action be taken an essential service which is being used to support people who are being rehoused after a period of time in emergency or supported accommodation would be lost. Also the NSAP funding from MHCLG could not be used as the funding is for posts of 3 years duration with the skills and support that Engage Leeds is able to offer. It would require a re-procurement exercise to be undertaken. However there are no grounds for doing this as the current contract is performing well, is of good quality and provides value for money. The purpose of procuring a service in 2017 which would run for 5 years plus a 3 year extension period was to ensure that the service would be flexible and innovative and offer value for money over the 8 year period.

2. **Best Council Plan Implications** (click here for the latest version of the Best Council Plan)

This provision addresses the Best Council Plan Priorities of :

- a. **Inclusive Growth** Supporting businesses and residents to improve skills, helping people into work and into better jobs; Targeting interventions to tackle poverty in priority neighbourhoods
- b. Health and Well-being ensuring support for the health and social care sector to respond and recover from covid-19; Reducing health inequalities and improving the health of the poorest the fastest; Supporting healthy, physically active lifestyles; Supporting self-care, with more people managing their own health conditions in the community; Working as a system to ensure people get the right care, from the right people in the right place
- Housing minimising homelessness through a greater focus on prevention
 And Housing of the right quality, type, tenure and affordability in the right places
- d. **Safe, strong communities** keeping people safe from harm and protecting the most vulnerable

3. Resource Implications

- There is provision within the Resources and Housing budget (Housing Related Support) to meet the cost of this contract extension.
- The funding for the additional Navigator posts is met by external funding brought into LCC.

Recommendations.

The Director of Resources and Housing is recommended to:

- a) Approve an extension of three years under Contracts Procedure Rules (CPR) 21.1 to the existing contract with GIPSIL Limited for the Engage Leeds Service, with effect from 1st April 2021 for a maximum value of £3,711,750 per annum.
- b) Approve the acceptance of the MHCLG funding of £314,684 revenue funding as a result of the Council's bid to the Next Steps Accommodation programme; and funding from the Flexible Homeless Grant of up to £240,000 for the Navigator posts.
- c) Approve the modification of the contract value under Regulation 72 (5) of the Public Contracts Regulations 2015 to include three Navigator posts with the NSAP funding totalling £314,684 for three years, along with funding for two further Navigators through the Flexible Homeless Grant for funding up to £240,000 over a period of up to 3 years. These figures are in addition to the value of the contract price of £3,711,750 per annum. The maximum total value of the variation will be no greater than £554,684, an increase of 1.86% when taking into consideration the overall contract value of £29,694,000.

1. Purpose of this report

1.1 The purpose of this report is to seek approval for an extension of the contract with Gipsil for the Engage Leeds Service for a three year period in accordance with Contracts Procedure Rule (CPR) 21.1 (contract extensions) and to vary the contract under Modification of Contracts during their Term under Regulation 72 (5) of the Public Contracts Regulations 2015 to include three Navigator posts funded by Next Steps Accommodation Programme (NSAP) at £314, 684 for three years and two Navigators funded through the Flexible Homeless Grant up to £240,000 over a period of up to 3 years

2. Background information

- 2.1. In 2017 after a comprehensive Housing Support Review by Commissioning it was agreed to commission a new floating support service to be part of an integrated housing support offer with clear pathways between services. Following the review and a competitive tender process, a consortium of Gipsil, Riverside, Connect Housing and Barca was awarded the contract for the Engage Leeds service which is a generic single service with a multi-skilled workforce for families and single people working city wide in localities for up to 1500 clients. Gipsil is the lead provider within the consortium.
- 2.2. Engage is outcome focussed and supports people to achieve and sustain independent living. Clients have a primary housing related support need such as need for help to settle into new accommodation, sustain existing accommodation or find accommodation. Clients also must have a secondary support need impacting on their ability to manage or sustain accommodation including debt, physical or mental health needs, substance misuse, offending or interconnected needs relating to social isolation and community engagement.
- 2.3. To meet the range of client needs, the service has a variety of staff teams including geographical wedges serving different parts of the city; highly skilled complex needs workers; an Advice, Employment and Engagement team and a Dementia team. The service also has staff co-located with Leeds Housing Options. The service has a triage hub team that also signpost people and agencies.
- 2.4. The service has experience of recruiting and employing Navigator posts. In 2019 the Engage Leeds contract was varied to include 2 sets of Navigator teams funded by MHCLG for the Rapid Re-housing Pathway and Housing Revenue Account respectively. The funding for the two posts by MHCLG expires July 2020 and the funding for the 2 HRA posts expired February 2020. These posts supported service users who had been rough sleeping and/or begging and identified by the Street Outreach Team and Street Support Team as needing intensive support to maintain accommodation and prevent a return to street based life enabling integration into the community.

3. Main issues

Extension of Engage Contract

3.1 Engage is a high quality, well performing and proactive service which has maintained full service provision and has seen an increase in demand during the Covid-19 pandemic. Overall, targets are being consistently met and the service takes steps to address any issues as needed. The Quality Management Framework highlights plenty of examples of good practice across each theme. The service

- achieves good, and lasting, outcomes with its clients and receives positive feedback from a variety of partners.
- 3.2 Engage have contributed to providing efficiencies for the City by creating specialist teams to respond to changing needs and priorities of the city. They have been successful in preventing an increase in homelessness by supporting on average over 1000 clients to sustain a tenancy each year.
- 3.3 Engage have further contributed to efficiencies for the City by providing daily support and assistance for the homeless people placed in hotels across the city at the start of and throughout the Covid-19 pandemic.
- 3.4 In additional to housing related support Engage also support some of the most vulnerable people in the City who have complex needs. Having specialist multidisciplinary teams enables support to be delivered in house, thus reducing the impact on other directorate core budgets. The most common complex need is a Mental Health issue 44%, Physical and Sensory Impairment 12.4% and Single Homelessness with Support Needs 12.8%. Engage has developed a team of specialist workers to support clients with a variety of needs. The service also employs specialist staff supporting the increasing demand from clients with dementia. The service achieves high outcomes in relation to maximising client's health and wellbeing, achieving over 85% with clients leaving the service:
- Better Managed Physical health
- Support to cease/reduce drug use
- Support to cease/reduce alcohol use
- Support with complex needs via a specialist worker
- 3.5 Engage perform consistently well with their key objectives. The service has achieved over 90% in the following housing related support outcomes for clients departing the service since 2018:
 - Clients being successfully supported to sustain a tenancy.
 - Clients being supported with positive move on.
 - Clients successfully supported to manage and reduce debt/arrears.
 - Clients supported to manage a budget.
 - Clients supported with welfare benefits
 - Clients supported to access employment
 - Clients supported with employment & advice via specialist worker
- 3.6 In Quarter 2, 2020-21, of the approximate 685 departures, 80% of clients had a successful end to their support which is consistent with previous years. These included planned moves, accommodation sustained and effective early intervention and prevention.
- 3.7 Throughout the Covid pandemic Engage have supported the Government direction of 'Everybody In' to accommodate rough sleepers in hotels by delivering daily welfare checks to 229 vulnerable clients and provided move on support to accommodation. In addition to this work, the service has flexed with a significant spike in referrals into Engage necessitating more informal support and signposting being offered.
- 3.8 Engage undertake quarterly client feedback surveys. These show consistently high satisfaction rates.

- 3.9 A modification to the existing Engage Leeds Service is required to allow for a modification to contracts for additional works, services or supplies by the original contractor that have become necessary and were not included in the original procurement and provided that the modification does not alter the overall nature of the contract and is below the following values:
 - a. the relevant threshold (currently £663,540); and b. is not greater than 10% of the initial contract value for service and supply contracts.
- 3.10 The modification of the contract will amend the total value of the Engage Leeds Service by £554,684 (1.86%) from £29,694,000 to £30,248,684 and is within scope of the Regulation.

Navigator Posts

- 3.11 This report also seeks approval for a further five Navigators to support clients who have previously been sleeping rough or begging and are identified as needing intensive support to maintain any tenure type of accommodation.
- 3.12 The proposed Navigator posts will support service users who have been rough sleeping and/ or begging and have been identified through the housing pathway, the Street Outreach Team, the Street Support Team or placed in emergency accommodation as needing intensive support to maintain accommodation, reduce and prevent a return to street based life and to enable integration into the community. This will involve intensive work on small caseloads that will look to ensure the individual is supported in their recovery to find employment, undertake training, develop budgeting skills, cultivate positive social circles and be better equipped to maintain their accommodation and independence and avoid returning to the street. Once an individual has been identified as suitable for navigation support the navigator will give continued support and be a single point of contact until the individual is settled and able to maintain their accommodation and independence.
- 3.13 The government published its national rough sleeper strategy in August 2018. The national strategy includes the targets to halve rough sleeper numbers (from the 2017 baseline) by 2022 and to end rough sleeping by 2027. The national strategy is rooted in three 'pillars':
 - To prevent new people from starting to sleep rough
 - To intervene rapidly when people start to sleep rough to help them off the street
 - To promote a person's recovery once they are off the street to build positive lives and ensure people don't return to rough sleeping.
- 3.14 Engage Leeds is already delivering directly related services and have the necessary infrastructure, they are considered uniquely placed and suitably experienced to do this work. Placing workers with Engage Leeds will mean that there is more capacity in the service to provide intensive support for people with the most chaotic lifestyles.
- 3.15 The posts will work closely with the Police, Leeds Housing Options, Leeds Street Team, Forward Leeds and other relevant services.

- 3.16 The Navigator posts will add value to and work within pathways to current services and develop a more coordinated approach for the individual supporting them as required.
- 3.17 Outcomes anticipated from this additional work will include individuals moving into supported or more permanent accommodation; engagement with drug and alcohol and health services, improved health and wellbeing and reduction in failed tenancies.

4 Corporate considerations

4.1 Consultation and engagement

4.1.1 Consultation has taken place with the Executive Member for Communities, Procurement and Commercial Services and the provider. Discussions about the service and the Navigator posts has taken place as part of the Street Support partnership work.

4.2 Equality and diversity / cohesion and integration

- 4.2.1 The Engage contract aims to reduce inequalities by its three core principles of preventing homelessness, sustaining tenancies and integration through supporting people to participate and access services and social/recreational opportunities available to them. Engage Leeds works with vulnerable citizens of Leeds in terms of them living in deprived areas, often being clinically vulnerable or having complex mental health needs. Engage works across all tenures of housing.
- 4.2.2 Engage work in a multi agency setting with partners and flex their service to meet the needs of the city. Evidence of this is an audit of clients worked with in January 2019-January 2020, found that 25% of clients lived in the Core Lower Level Super Output Areas with 8% living in 1% areas; 17% of clients lived in 3% areas and 10.7% of clients lived in Medium Super Output Areas (5% area).
- 4.2.3 The service is successful at maximising clients' economic welfare. It has established an Employment, Advice and Engagement Team to support clients with access to welfare, maximising benefit and income and employment skills. They have continued to achieve positive results despite Covid restrictions and economic downturn.
- 4.2.4 The service supports community engagement by clients. They offer a variety of community based drop in surgeries, peer support schemes and befriending schemes which have been vital during the Covid period.
- 4.2.5 The additional Navigator posts will support clients to settle into the accommodation and the community.
- 4.2.6 An Equality, Diversity, Cohesion and Integration Impact Screening has been completed in relation to this decision. There are no issues to be addressed.

4.3 Council policies and the Best Council Plan

4.3.1 The service meets the following Council policies as evidenced above:

- By contributing to the Best Council Plan:
 - Inclusive Growth Supporting businesses and residents to improve skills, helping people into work and into better jobs; targeting interventions to tackle poverty in priority neighbourhoods.
 - Health and Well-being ensuring support for the health and social care sector
 to respond and recover from Covid-19; Reducing health inequalities and
 improving the health of the poorest the fastest; Supporting healthy, physically
 active lifestyles; Supporting self-care, with more people managing their own
 health conditions in the community; Working as a system to ensure people get
 the right care, from the right people in the right place
 - Housing minimising homelessness through a greater focus on prevention and housing of the right quality, type, tenure and affordability in the right places
 - Safe, strong communities keeping people safe from harm and protecting the most vulnerable
 - The service will continue to contribute to the Housing Strategy particularly the outcomes related to reducing homelessness and rough sleeping by supporting vulnerable people who have previously been rough sleeping to sustain tenancies.
 - The government published its national rough sleeper strategy in August 2018. The national strategy includes the targets to halve rough sleeper numbers (from the 2017 baseline) by 2022 and to end rough sleeping by 2027.
 - The work proposed supports the Council's ambition for Leeds to be a compassionate and caring city by helping to reduce rough sleeping and begging and the negative impacts of this across the City. It also supports the 'Vision for Leeds 2011-2030' and the delivery of wider outcomes relating to community safety, health and well-being, social inclusion and employment and training.
 - The services will also make a contribution to the Health and Wellbeing Strategy (2016-2021) in terms of helping to ensure that 'people will live in healthy, safe and sustainable communities'.
 - The service also contributes to priorities within the Leeds Drug and Alcohol Strategy 2019- 2024 by delivering health promotion and helping to increase the number of successful completions from drug and alcohol treatment programmes to support recovery.
 - The Inclusive Growth Strategy, supporting Leeds to be the best city for health and wellbeing.

Climate Emergency

4.3.2 The service operates from a number of locality 'wedge' offices and offers support at the clients' homes, telephone support or community venue surgeries along with staff in the Leeds Housing Options city centre office. This ensures easy access for service users, and therefore minimising the need to travel and encouraging the use of public transport. This helps to reduce carbon emissions and environmental pollution which contributes to city actions to better manage air quality. In response to the Covid-19 pandemic, the service adapted its remote delivery model via telephone, video-conferencing and social media, whilst still offering clients face to face contact as needed. Engage will carry this model forward into the extension period balancing face to face client contact and new ways of working.

4.3.3 The service specification requires that Engage Leeds undertakes to meet all legislation, guidance and good industry practice in environmental management and the objectives of the Council's sustainability policies. Officers from Adults and Health work with the provider through the established contract management process to ensure the service is proactively seeking to minimise its carbon footprint and thereby support the Council in achieving its ambition to be carbon neutral by 2030.

4.4 Resources, procurement and value for money

- 4.4.1 The cost of the contract extension is met by funding from the Resources and Housing budget. The funding for the additional three Navigator posts is met by the grant funding awarded by the MHCLG Next Steps Accommodation Programme in December 2020 and funding for a further two Navigator posts funded by the Flexible Homeless Grant.
- 4.4.1 This provision is considered to be good value for money as set out in section 1 and as evidenced by achieving outcomes for vulnerable people and communities and providing efficiencies as demonstrated in 3.2 of this report.
 - This is a preventative service that reduces demand on the health and care system in Leeds
 - It meets the key council priorities of reducing homelessness and responding to Covid-19
 - The service has flexed during Covid and capacity has exceeded contract requirements
 - The service contract price has not increased since the start of the contract in 2017.
 - Following the Strategic Review of 2015-16 various different floating support contracts were merged into one contract to achieve efficiencies and savings.
 - The Service operates with the HRS Gateway system commissioned by Leeds City Council to link co-dependent commissioned services through case management, enabling joint working and pathways for holistic support of clients' health and wellbeing. Engage has been integral to the continued development and operation of the Gateway system.
- 4.4.2 The recommendations within this report are compliant with the following regulations.
 - a) The contract extension is in accordance with CPRs 21.1 as it is in accordance with its original terms and proves to deliver Best Value.
 - b) The variation of the contract in relation to the Navigators posts is in accordance with Regulation 72 (5) of the Public Contracts Regulations 2015 too as it is within the scope of the original contract.
- 4.4.3 The service will continue to be contract managed by the Commissioning team in Adults and Health Directorate. Robust contract management processes ensure the on-going monitoring of quality, performance and value for money.

4.5 Legal implications, access to information, and call-in

- 4.5.1 This is a Key Decision which is subject to call-in as the value of the extension is greater than £500k. A notice has been published on the List of Forthcoming Key Decisions dated 4th February 2021.
- 4.5.2 There are no grounds for treating the contents of this report as confidential with the Council's Access to Information Rules.
- 4.5.3 The recommendation within this report is in accordance with Contracts Procedure Rule 21.1 which allows a contract to be extended before its expiry date where it is in accordance with its terms and proves to deliver value for money.
- 4.5.4 The modification of contracts is governed under Regulation 72 of the Public Contracts Regulations 2015. This considers the extent to which a contract may be modified before it should be considered so substantially changed as to necessitate a new contract.
- 4.5.5 The provisions of Regulation 72 (5) provide an exception "where all of the following conditions are fulfilled:—
 - (a) the relevant threshold mentioned currently (£663,540); and
 - (b) 10% of the initial contract value for service and supply contracts and 15% of the initial contract value for works contracts,
 - provided that the modification does not alter the overall nature of the contract or framework agreement: -
- 4.5.6 In making this modification the above conditions of Regulation 72 (5) are deemed to be satisfied for the following reasons:
 - (1) The Navigators posts meet the key council priorities of reducing homelessness and responding to Covid-19 and as a preventative service reduced demand on the health and care system in Leeds.
 - (2) Engage Leeds is already delivering directly related services and have the necessary infrastructure, they are considered uniquely placed and suitably experienced to do this work. Varying the Engage Leeds contract will facilitate the posts starting in April 2021, going out to the wider market would inevitably delay these important posts commencing impacting on rehousing homeless and Covid recovery.
 - (3) The contract sums set out at paragraph 3.7 of this report show the value of the initial contract, and the proposed increase due to the request to modify the contract. Taking these figures into account, the modification of the contract by the addition equates to 1.86% (£554,684) of the original contract value. The percentage value uplift is within the value permitted by regulation 72 (5) of the Public Contract Regulations 2015.
- 4.5.7 There is no overriding legal obstacle preventing the variation of this contract under CPRs 21.7 (variations) and the contents of this report should be noted. The percentage value uplift of 1.86% is within the value permitted by regulation 72 (5) of the Public Contract Regulations 2015. In making the final decision, the Director of

Resources and Housing should be satisfied that the course of action chosen represents best value for money.

4.6 Risk management

- 4.6.1 The approval of a 3 year contract extension will enable continuity of service provision and increased surety for the providers. This will help to retain staff and enable continued innovation, which provides continuity of support for vulnerable clients.
- 4.6.2 Appropriate governance arrangements are in place to identify and mitigate identified risks including regular contract management meetings, quality meetings and overview of contract risk.
- 4.6.3 The service has been integral to the development and operation of the Gateway Management IT system. The system links co-dependent commissioned services through case management, enabling joint working and pathways for holistic support of clients' health and wellbeing.
- 4.6.4 Engage Leeds is a key service supporting 1500 clients at any one time. It provides a key service in both supporting its clients and signposting clients into the wider Health and social care provision.

5 Conclusions

- 5.1 It is proposed to invoke all of the three year extension period that is available for this contract up to 31st March 2025. This will importantly provide surety to the consortium as it enters the final year of the contract. The extension will avoid disruption for clients, the service and partnership working across city. It will ensure that the service will be able to retain and further develop an experienced staff team.
- 5.2 Implementing the full three year extension period now will mean that from 1 April 2021 there will be four further years of service delivery under the current contractual arrangements. This will allow the employment of the three NSAP funded Navigators funded for three years and provide the time for in depth discussions and consultation to take place about what the long term future needs of the city are with regards to housing related support. Contract terms and conditions still enable changes or termination if required, should circumstances change.
- 5.3 The service is well placed to meet both the health and economic needs of clients during and post Covid. The service has specialist teams supporting clients' physical and mental wellbeing. The service is adept at supporting people to maximise income, remain in properties and improve employment opportunities.
- 5.4 The service plays an integral part in the wider Housing Related Support Pathway to prevent homelessness by supporting high numbers of referrals from Adult Social Care, Leeds Housing Options and partner commissioned agencies; as well as signposting potential clients correctly around the sector. The service has been integral to the development and operation of the Gateway Management IT system depended upon by LCC Commissioners and commissioned providers.

5.5 The funding will be used to fund five Navigator posts that support people who need additional help to settle into accommodation, recover and engage with activities and services in their local communities. Three of the Navigators will be funded for a period of three years from 1st April 2021 from NSAP and two further Navigators funded for a period of up to 3 years from 1st April 2021 by FHG.

6 Recommendations

The Director of Resources and Housing is recommended to:

- a) Approve an extension of three years under Contracts Procedure Rules (CPR) 21.1 to the existing contract with GIPSIL Limited for the Engage Leeds Service, with effect from 1st April 2021 for a maximum value of £3,711,750 per annum.
- b) Approve the acceptance of the MHCLG funding of £314,684 revenue funding as a result of the Council's bid to the Next Steps Accommodation programme; and funding from the Flexible Homeless Grant of up to £240,000 for the Navigator posts.
- c) Approve the modification of the contract value under Regulation 72 (5) of the Public Contracts Regulations 2015 to include three Navigator posts with the NSAP funding totalling £314,684 for three years, along with funding for two further Navigators through the Flexible Homeless Grant for funding up to £240,000 over a period of up to 3 years. These figures are in addition to the value of the contract price of £3,711,750 per annum. The maximum total value of the variation will be no greater than £554,684, an increase of 1.86% when taking into consideration the overall contract value of £29,694,000.

7 Background documents¹

7.1 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.