



Bath & North East Somerset
Local Safeguarding Children Board

Red: Off Target; Amber: On Target; Green: Complete

As the Local Safeguarding Children Board for Bath and North East Somerset we will coordinate and monitor the work of agencies, especially but not exclusively those providing services to children and families, to safeguard and promote the welfare of children. In doing so the Board will:

Promote and support activities that protect children and young people from significant harm and the continuing risk of harm;

Work to raise awareness within the wider community, including statutory, voluntary and independent agencies, about how everybody can contribute to safeguarding children and promoting their welfare.

Safeguarding is everyone's business.

Business Plan 2015-18

Updated March 2016

Key Priority 1

The LSCB will co-ordinate a multi-agency approach to reducing harm to vulnerable Children and Young People. This will particularly focus on children and young people associated with the issues of:

- Physical Abuse
- Neglect
- Sexual Abuse
- Child Sexual Exploitation
- Children missing or absent
- E-Safety
- Self harm / suicide
- Emotional well being
- Disabilities
- FGM
- Domestic Abuse
- Substance misuse
- Mental health and link to domestic abuse and substance misuse
- Radicalisation (Prevent and Channel)
- Slavery
- Harm associated with service provision (eg, mental health bed availability or provider failure)
- Children affected by parental offending

Outcomes

1. Robust arrangements which identify and support children and young people at risk of Child Sexual Exploitation
2. Qualitative and quantitative information and intelligence is evident in service improvements
3. Children's workforce have a common understanding of issues, evidence based decision making, actions, sharing concerns and evaluations
4. Development of multi-agency information sharing arrangements to ensure services are provided at the earliest opportunity
5. Implementation of Early Help Strategy to identify and support children and young people at risk of harm

Issue	Sub group or Lead	Actions for 2015-16	Completion Date	Progress (RAG)
1. Gather assurance on e-safety arrangements	PPPG	Review and update existing Policy	End of Nov 15	Update Dec 15: Revised E-Safety Strategy presented to LSCB for approval in Dec 15
	PPPG	NEW Ensure 2015-16 schools self - assessment picks up any e-safety issues (ensure feedback from pupil parliaments is included)	Jun-16	Meeting planned with LSCB Schools rep to design new self-assessment in Sept 15 Update March 16: E-safety added to audits which have now been returned and sample visits being undertaken before final report completed.
2. Put in place new Prevent and Channel responsibilities	Divisonal Director/Head of Safeguarding & QA	Implement and assure that new statutory responsibilities are in place	Mar-16	New arrangement have been established and approved by LSCB / LSAB and RAG A task and finish group has been established to look at the training needs of the stakeholders in line with the Prevent action plan; funding has been secured for a trainer to work across B&NES and South Glos
3. Monitor progress of Multi-Agency Safeguarding Hub project	MASH Project Board	Implement a MASH	Sep-16	Update Mar 16: Draft model and project plan in place; progress is being made with four task and finish groups in place. Next Board meeting is 29th Feb 2016.

4. Gather assurance on the effectiveness of missing from home, care and school arrangements	PPPG CSE Group	Continue to look at the data, pursue timeliness and review Protocol arrangements in 2015-16	Mar-16	CSE / Missing Data now incorporated into quarterly performance report for specialist services
	CSE Group	Receive a report from the CSE and Missing Sub Group on the effectiveness of these arrangements	Dec-16	Timeliness of receiving the missing information from the Police is an issue and Police are taking action. Update Dec 15: Compass Team now undertaking Return Home Interviews (RHI) - review Dec 2016
5. Deliver CSE action plan (ensure Willow Project is effectively functioning, strengthen links with schools and sexual health and review and refine strategy and protocol)	CSE Group	Ensure arrangements outlined in the plan are effective and understood by all staff	Reviewed annually – March 2016	Action plan in place and monitored routinely at the sub group – new actions added as required Stakeholder event in Jan 2016 focus on CSE. Update Dec 15: Review of Willow Project undertaken in October. Team working effectively - and actions identified to ensure further improvements.
6. Implement and monitor effectiveness of mental health protocol (CSC and AWP specific) NEW incorporate additional multi-agency partners into the protocol	PPPG	Finalise and approve the Protocol and disseminate	Nov-15	Update Dec 15: draft shared and approved by PPPG; agreed to include more agencies in the document and review in 12 months
	PPPG	NEW Review protocol and include additional partners	Dec-16	Not due
	PPPG	Undertake an audit to ensure it is effectively audited – add to PPG audit plan	2016-17	Not due

<p>7. NEW Assurance from Children's commissioner and the Emotional Health and Wellbeing Strategy group (Children and Young People) that local arrangements are robust and meeting local needs</p>	<p>PPPG</p>	<p>Update report from the lead commissioner on the effectiveness (including reference on access to mental health beds are available)</p>	<p>Dec-15</p>	<p>Update Dec 15; Action plan in place and monitored routinely by the Emotional Health and Wellbeing Strategy group Report to LSCB in Dec 15</p>
<p>8. Progress targeted work with drug and alcohol agencies, mental health and domestic abuse services – seek assurance that effective co-ordinated work is in place</p>	<p>PPPG</p>	<p>Work with services and commissioners to improve data – in line with contract renewal times</p>	<p>Jun-16</p>	<p>Update March 16: This needs harnessing and will be the focus of the next meeting and will report back in June 16.</p>
	<p>PPPG</p>	<p>Monitor data and undertake audit of cases where families are affected by Toxic Trio</p>	<p>Dec-16</p>	<p>Not due</p>
<p>9. Progress work with the Self Harm and Suicide Prevention groups consider the best mechanism to raise awareness of risks with low level ligatures</p>	<p>TWFD</p>	<p>Set up process to ensure learning and recommendations from the self harm and suicide prevention groups inform and are included in LSCB multi-agency training</p>	<p>Jun-16</p>	<p>Update March 16: the former chair of the LSCB Training and Workforce Development sub group is a member of the SH and SP groups and feedback requirements however this needs formalising.</p>

10. Continue to monitor the transition of children to adult services	PPPG	Receive update report from commissioning and Transitions leads	Dec-15	Update Mar 16: Report presented to the Board for update
11. On-going liaison with South West Child Protection Procedures and arrangements going forwards	RB		Contract signed July 15	Contract with Signis signed; agreement with other LAs in regard to the management of the procedures and editing of content has been sent for comment; first contract review date to be agreed. Update December 15: Editorial Board has now met and agreed priorities for the SWCPP. Update March 16: new website went 'live' on 5th Feb 16.
			First review Dec 15 Refresh in June 16	
12. Finalise Early Help Strategy	PPPG Comms Group	Draft of the EH Strategy to come to the LSCB for September 2015 Early Help Board will continue to meet in conjunction with all Early Help partners.	Nov-15	Update Dec 15: Early Help Strategy completed in November and will be launched in January 2016. Update March 16: Strategy launched in January.
	PPPG	Continue to monitor impact of Early Help services	On going	
13. Implement task and finish group to address needs of children and young people affected by parental imprisonment (in line with iHop presentation Dec 14)	CAP1	The LSCB has received information from I-Hop and the services that are delivered locally to families.	Jul-16	Update Dec 15: Initial meeting of agencies has now taken place. TOR has been agreed and an initial mapping exercise has been undertaken. £1000 funding agreed. Update March 16: The i-HOP training is scheduled for 7 March. A leaflet and poster has been produced, providing information for parents, carers and grandparents and links are being established with the Prison Service.

14. Gather assurance on safeguarding issues for children and young people with disabilities	PPG	Facilitate the audit and feedback findings to improve practice where needed	Mar-16	<p>Update Dec 15: Re-audit planned for spring 2016. Undertook an audit back in Jan 2015 – measure of reassurance but process hindered the effectiveness of this.</p> <p>Update March 16: Update timetable following review of PPG and other QA processes.</p>
15. Assurance that the above areas are included in LSCB multi-agency training	TWFD	Review training programmes to ensure all areas are covered	Dec-15	<p>Update Dec 15: All areas covered across the different courses at awareness and specialist levels - with the exception of Slavery, which is currently under development</p>

Key Priority 2

To increase the participation and involvement of children, young people and parents/carers in service improvements and developments both:

- Experience of current services
- Aspirations for new ones

Outcomes

1. Agencies learn and demonstrate change in practice from experience of young people
2. Children and parents report that they feel more engaged in the Child Protection Process
3. Children and parents contribute to the development and improvement of services
4. Children experience good seamless arrangements between services regardless of their different level of need or the risk
5. Childrens views are clearly articulated in assessments, plans and reviews
6. LSCB partners demonstrate reflective feedback from and to Children and Young People and their parents and care

Issue	Sub group or Lead	Action	Completion Date	Progress (RAG)
1. Seek assurance that new child friendly Working Together guidance is disseminated	PPPG	Request confirmation from Vol Sector Network that providers have disseminated WT2015	Mar-16	WT2015 disseminating with a formal request for confirmation being sought. Update March 16: Distributed to VSC groups via Children and Young People's Network
	Comms Group TWFD		Sep-15	All training packages has been updated to include reference to WT2015 and the child friendly version LSCB members have discussed in detail changes

	PPPG	Request confirmation from the In Care Council (group of young people in care) that the most vulnerable young people have received WT2015	Mar-16	Scheduled Children's Commissioning report to PPPG in Feb 16 Update March 16: taken to PPPG <ul style="list-style-type: none"> • On B&NES LSCB webpage • On Participation webpage • Distributed to members of In Care Council • Distributed to Designated Safeguarding Leads <ul style="list-style-type: none"> • Sent to PSHE lead to consider as possible development for PSHE Safeguarding Lesson
	PPPG	Request confirmation from Board members this has been actioned.	Dec-16	Not due
2. Continue to seek assurance from IRO, CP chairs, Children Specialist Services, Off the Record Advocacy Service and other agencies that children, young people and parents are invited and supported to participate in meetings – seek their views on their experience	PPG	Audit cases	Feb-16	Update Dec 15: Carried out two audits on the 'Voice of the Child' over the last 15 months and have noted significant improvements; next one diarised for Feb16 Update March 16: PPG audited Voice of the Child in its February 2016 meeting, looking at four Child Protection Conferences. PPG was re-assured that there was evidence of the children being listened, non verbal communication being understood and plans being informed by the Voice of the Child
	PPPG	Childrens Commissioner to provide annual assurance on uptake of advocacy	Jun-16	Not due

	PPPG	IRO report to ensure reference participation	Jun-16	Not due
	PPPG	CP Chair report to ensure reference participation	Sep-16	Not due
3. Continue to engage support of young people in stakeholder events and in recruitment of staff	Comms Group	Continued liaison with the Participation Officer in relation to how the views of young people are represented	Jun-16	Update March 16: Representation of young person on Communications sub group Participation Officer on the group
	Comms Group	Discussion with all LSCB members on the potential for involvement of young people in their recruitment to safeguarding posts	Jun-16	Update March 16: Council Policy outlining methods of engagement with young people in the recruitment of posts in place. Detailed report on Council engagement reported at the Board
	NEW Divisional Director	Mapping Exercise on partners engagement work with young people in recruitment	Dec-16	
	PPPG	Report from Childrens Commissioning on activities around engagement and recruitment	Mar-16	Update March 2016: Report went to PPPG in Feb 16 and assurance given. For info at March LSCB. Business plan updated above.
4. Commence work with the e-teams to develop new materials	Comms Group	New materials for working with young people to be disseminated	Dec-16	Update March 16: Materials are currently being developed by members of the CSE group
5. Development of further children and young people friendly communication strands eg, potential for Facebook, Twitter, You Tube etc to communicate messages	Comms Group	Website being relaunched and will include facilities to have community space engagement	Sept 16	Update Dec 15: LSCB have agreed shared website with LSAB. Initial meetings scheduled to build and agree content. Update March 16: work ongoing regarding the content and format. Hoping for 'go live' in late spring/summer

6. NEW Incorporate learning from SHEU - how??				
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Key Priority 3

Strengthening the LSCB's evaluation and challenge of the effectiveness of individual agency safeguarding arrangements

Outcome

1. Safeguarding standards of section 11 are embedded across the workforce effectively and ensure that all Commissioning is using the same standards
2. Audit tool is generic to services operating across region
3. Improved number and quality of section 11 returns
4. Continuity of attendance and participation from members attending
5. Effective challenge between LSCB Board members

Issue	Sub group or Lead	Action	Completion Date	Progress (RAG)
1. Continue to undertake multi-agency audits and provide feedback (specifically review school and GP engagement; re audit categorisations of abuse; CSE cases; joint audit with LSAB sub-group – specific focus on procedure throughout)	PPG	Develop a programme of themes to review across the life of the business plan in line with LSCB priorities	Jun-15	2015-16 Audit schedule completed

2. New Gather the learning from joint audits in accordance with the OFSTED framework	PPG	Assess the potential to undertake joint audits	Mar-16	Update March 16: process to be agreed once QA process review finalised
3. Ensure Section 11 sub-regional mini audits for 2014-15 are completed, analysed and responded to	PPPG	Receive reports from mini audits	Mar-16	Update Dec 15: CSE audit is being circulated for completion having been considered by CSE and Missing Sub Group. Training mini audit has been to the LSCB. Met with West of England LSCBs to discuss a proposal for future audit arrangements. Update March 16: CSE audit on the agenda for discussion. A group to work together to provide individual feedback to each partner.
4. New seek assurance on private fostering numbers	PPPG and LSCB Chair	Receive update report on private fostering numbers	Jun-16	Report received at LSCB and PPPG – issue with private fostering numbers being higher than expected to be followed up Update March 16: New date requested (original date was Dec 15)
5. Ensure that findings from lessons learned from reviews are reported and actions to improve effectiveness are addressed	PPG	Provide bi-annual reports to the LSCB; feedback to individual staff and agencies; share findings with Training and Development Sub group	On going	These actions are routinely carried out – notes of meetings are recorded; LSCB receives reports
6. Assurance from SCR sub-group that single agency action plans from SCR have all been	SCR Group	Confirmation required that all have been completed	Dec-15	Update Dec 15: All single agency action plans completed.
7. Assurance that Section 11 action plans for 2014-15 have been signed off and completed	PPPG	Ensure via the full section 11 audit in 2015-16 that all previous actions have been completed	Sep-16	Update March 16: Full section 11 audit planned for May in line with other LAs.

8. Review effectiveness of partners challenge at CP Conferences	PPG	Identify cases where challenge has been made at CP Conference and audit impact and effectiveness of the challenge	Jun-16	Not commenced currently
9. Audit adult care commissioned services responses where there are CP concerns	PPG	Conduct audits	Jun-16	Not commenced but have identified that the mental health protocol will be launched early in the 2016 if not before and this audit will look at mental health in the first instance when the protocol has bedded in. Update March 16: part of themed reviews and QA of CP Conferences and have commented on practice of adult service agencies.
10. New: Multi-agency audit – children absent from school	PPPG	Conduct Audit	Jun-16	Audit proposal approved at Dec LSCB. To feedback at March LSCB. Update March 16: Moved to June agenda
11. Understand the assurance mechanisms commissioners have in place for safeguarding children and young people in contracts	PPPG	Receive a report from CCG, NHS England and Council on assurance mechanisms	Mar-16	Update March 16: It has been agreed that this is the subject of the LSCB Business Development session in April; safeguarding toolkit for commissioning and contracts developed by B&NES Council
12. Banes NHS CCG and B&NES Council to ensure standardised contractual requirements are included in all contracts	PPPG	Evidence of contract content on safeguarding and safer recruitment requirements	Mar-16	Update March 16: Contractual content has been standardised as far as possible taking fully into account CCG content as well - ready for roll out in Council contracts in April 16.

Key Priority 4

Sufficient and competent workforce to ensure Children and Young People are safe

Outcome

1. Evidence of learning across the partnership collectively and individual agencies from the Learning and Improvement Strategy
2. Staff are trained and developed at appropriate level and knowledge to enable them to be effective in their work to keep children safe
3. Training sub-group ensure LSCB training meets the current and emerging need of the workforce
4. LSCB is assured that single agency training is appropriate to needs

Issue	Sub group or Lead	Action	Completion Date	Progress (RAG)
1. Disseminate Working Together to Safeguard Children 2015 and other recent reports / guidance documents	Comms Group	To ensure all member agencies have an appropriate understanding of the changes incorporated within WT2015	Jun-15	Discussed at June LSCB
		Review dissemination of LSCB Key Messages to organisations outside of LSCB		
	PPPG	New contracts to include reference to WT2015	Sep-15	Confirmation from Council Business Support team that all new contracts have amended wording; all existing contracts contain a clause requiring the provider to be aware of all new guidance and work in accordance with this

2. Assurance that nationally identified areas of abuse are included in all staff training eg, modern slavery, trafficking, FGM and CSE	TWFD	Review current training and ensure these areas are included in LSCB multi-agency training; where not covered develop programme accordingly	Sep-15	<p>Update Dec 15: Link to FGM Home Office E-Learning package on LSCB website. Comprehensive package of CSE training in place. Looking to develop training with LSAB regarding modern slavery and trafficking</p> <p>Update March 16: Discussion scheduled for 1st March to look at modern slavery and honour based violence</p>
3. Develop electronic training booking record management system to improve quality of information to provide assurance of multi-agency training	TWFD	Review booking system and develop plan to address issues	Dec-15	<p>Update Dec 15: Electronic booking system in place and storage of delegate information</p>
4. Assure that schools are complying with minimum safeguarding training requirements issued in Mar 2015	PPPG	Review school self-assessment to ensure this areas is addressed to enable assurance to be provided	Mar-16	<p>Update Dec 15: Revised school audit is in place, requires final amendments and circulation.</p> <p>Update March 16: training incorporated in audit which is now returned and sample visits taking place prior to completing full report</p>
5. Ensure single agency training is an appropriate standard	TWFD	Develop a quality framework for single agency training	Mar-16	<p>The learning outcomes for single agency training are included in the LSCB Training Strategy</p>
		Develop 'train the trainer' training	Mar-16	<p>Update March 16: train the trainer course planned in Sept 16</p>
		Support Peer Audit for single agency training	Dec-16	

6. Assurance that Prevent training is available to all agencies	Prevent Board	Establish a Prevent training task and finish group and implement training plan	Mar-16	<p>Update Dec 15: Prevent training sub group convened, matrix and prioritisation of agencies to be trained. Training resource identified. Series of training events held; WRAP awareness training to schools DSLs taking place in Nov and Dec; Train the Trainer WRAP session set for Dec 7th being shared with South Glos.</p> <p>Update March 16: WRAP sessions are well established and 2 more due for all staff in March.</p>
7. NEW Assurance that new LSCB E-Safety Strategy is incorporated in Multi agency training and all training in schools	TWFD	Review training to ensure that reference is made to new policy to support objective 1.1 above	Jun-16	<p>Update Dec 15: added to business plan due to challenge from CTB to LSCB. T&WFD and training team are aware of addition.</p> <p>Update March 16: Planning for Esafety Strategy to be incorporated into future training.</p>
8. Confirm collaborative arrangements with LSAB Training and Development sub group to enable an effective and efficient response to learning by agreeing joint training where appropriate	TWFD	Set up meeting with LSAB Training and Development representatives to review existing training programmes	Oct-15	<p>Update Dec 15: Meeting booked for 15th December</p> <p>Update Jan 16 : Follow up meeting planned for March 2016. LSCB/LSAB to pilot joint training sub group from May, proposal going to both Boards in March (1st for (LSCB).</p>
	TWFD	Develop opportunities to join courses	Mar-16	<p>Update Dec 15: - looking at Slavery, Trafficking and FGM.</p> <p>Update March 16: Meeting booked in March to develop further.</p>

Key Priority 5

Continuous improvement of LSCB

Outcome

1. LSCB is graded as at least 'good' against Ofsted/CQC expectations
2. LSCB has a high profile and is seen as effective in both quality assurance and driving improvement in safeguarding
3. Clear, complementary role and relationship with other strategic boards that increases effectiveness and efficacy
4. Formalised joint working arrangements with the LSAB

Issue	Sub group or Lead	Action	Completion Date	Progress (RAG)
1. Review LSCB and sub-group Terms of Reference – seize opportunity for joint working with LSAB sub-groups	All sub groups and LSCB	All revised Terms of Reference to be shared with LSCB – ensure LSAB arrangements have been considered	Sep-16	Update Dec 15: All sub groups have revised and PPG to revise in Jan 16 New standardised format devised November 2015 Update March 16: PPG to be updated once review of group takes place. LSCB can then be reviewed re any changes.
NEW LSCB induction to be revised in line with LSCB TOR	Business Support Manager	Revised Induction pack to be resent to all members to sign up to the member agreement	Dec-16	
2. Assess effectiveness of Thematic Reviews	LSCB	Questionnaire to be completed and analysis shared with LSCB	Sep-15	Update Dec 15: Agreed to continue with themed reviews and set the next three themes; questionnaires returned from a number of agencies.

3. Analyse feedback from other LSCB Ofsted inspection reports to identify areas for improvement for the LSCB	PPPG	Overview report on good LSCB inspection reports	Jun-16	<p>Update Dec 15: Scheduled for reporting amended time scale</p> <p>Update March 16: Ofsted inspection outcomes are routinely reported across the Council, however a more systematic approach to sharing and learning from these is required.</p>
	Ofsted Inspection Preparation Officer LSCB Business Support Manager	RAG rate LSCB against Ofsted grade descriptors	Dec-15	<p>Update Dec 15: report to be discussed with the Board - have moved the timescale for this and the item above as needed to assess ourselves and then look at others.</p>
4. Develop new LSCB website and consider opportunity to link with LSAB	Comms Group	In conjunction with the LSAB we will develop a shared website and also allow for separate content relating to Children and Adults	Jun-16	<p>Demonstration of website capability scheduled for August 2015</p> <p>Update March 16: joint website to go live, date anticipated in the summer</p>
5. Develop systematic method for reviewing, disseminating and monitoring implementation of multi-agency policy and procedures (initial priority to review against FGM, Working Together 2015)	PPPG	Develop and pilot method	Mar-16	<p>Developing method with FGM at LSCB Business Development session in Oct 15</p> <p>Update March 16: All policies are now sent out to all LSCB members and dissemination confirmation lists are maintained but responses are often poor. Agreed at LSCB that new policies will be sent on a monthly basis to aid this.</p>

6. Review Information Sharing Guidance	PPPG	Work with SW LSCBs to review guidance document	Mar-16	Update March 16: New policy approved by PPPG and on the March LSCB agenda for information. Minor amendments were made and sent to LSCB members by email for consultation before finalising the policy now on LSCB website.
7. Clarify arrangements for identifying and writing new policy, protocols, materials etc	LSCB Business Support Manager	Set out arrangements for LSCB	Dec-15	Update Dec 15: Prepared a list of all policies and procedures and is being discussed at next PPPG meeting. Front sheet for policies now in place. Update March 16: New process agreed at PPPG in February for the writing and reviewing of all policies and protocols.
8. Secure and induct lay members, schools and housing representatives to LSCB and sub-groups	LSCB Chair			Lay members joining LSCB in Sept 15 induction meeting scheduled Induction for Curo member scheduled.
9. Gather assurance on Private Fostering arrangements	Comms Group	Produce information		Reviewed and developed a suite of information leaflets which have been distributed Article in the Connect magazine which goes to every household in the LA
	PPPG	Review information from schools audit and correlate with Council data	Jun-16	Update Dec 15: this is in hand but not complete - revise date to Mar 16 - LSCB confirmed agreement Update March 16: date revised again to June 16
	PPPG	Continue to monitor the number of private fostering arrangements	On going	
10. Review Chair's performance	Strategic Director Council Chief Executive	Implement Chair Review Panel with 360 feedback	Dec-15	Update Dec 15: questionnaires completed by LSCB members, Chairs appraisal scheduled in Dec 15 Update Mar 16: This took place in Feb 16
11. Review activity data in order to provide assurance that children are safeguarded	PPPG	Take a closer look at the age of Looked After children in comparison to other areas to understand if B&NES is an outlier and if so why	01/06/2016	Update March 16: New date agreed

	PPPG	Generate data on children's ethnicity, disability and gender for those on CP plans and Looked After for next years report	Jun-16	Not due
	PPPG	Triangulate serious sexual offences data with Avon and Somerset Constabulary	Mar-16	Update Dec 15: Initial update provided at PPPG in Aug 15. Follow up verbal report provided in Nov 15; 18 months cases were considered, new system to be implement for monthly check on the data between the Police and CSC. Update March 16: work required to progress triangulation of information on child perpetrators of SSOs
12. Develop stronger links with other Boards	LSCB Chair	Attend other Boards as appropriate (RAG, H&WBB, CTB etc)	Mar-16	LSCB chair is also chair of the LSAB Meets bi annually with the PCC
13. Review safeguarding performance report ensuring new data is added as required	PPPG	Review the design of the report to pull out 'so what' qualitative information where possible	On going	Update March 16: At the last meeting data was provided by different Council teams to help enhance what is being considered, this included data on other providers