

## **Consultation on the future of Denbighshire County Council's in-house care services**

This consultation document should be read in association with the supporting documents, available on the Denbighshire County Council website in the consultation section: <https://www.denbighshire.gov.uk/consultations>. Supporting documents are available in hard copy, and may be available in other formats on request. Please request these by contacting the Customer Connections Team on 01824 708090, email: [ssdcomments@denbighshire.gov.uk](mailto:ssdcomments@denbighshire.gov.uk) or by mail to Russell House, Churton Rd, Rhyl, LL18 3DP.

The supporting documents provide more detailed information about the views and suggestions that have already been gathered about the future of our in-house services, and other evidence which we have used to develop the current options. They also include information that could help to provide alternative solutions.



### **1. The story so far - why change is necessary**

The council currently owns and runs three residential care homes for older people (all of which provide some facility for day care) and one day care centre for adults.

Denbighshire County Council has been conducting an exercise to look at the future of these in-house social care services since March 2014, when the Performance Scrutiny Committee requested that an Elected Members' Task & Finish group be established to "*examine value for money options for delivering high quality social care services in the County*".

There are two main reasons for this:

- The Council needs to respond to the changing expectations of Welsh Government and the wider population about what modern social services should look like.
- The Council needs to focus its limited resources towards the areas of highest demand, because of the ongoing requirement to deliver financial savings.

The Council is modernising social services in preparation for the implementation of the Social Services and Well-being (Wales) Act in April 2016. This was developed due to the fact that people are living longer and have different aspirations about their health and social care needs. More information on the Act is available on the website with the other supporting documents. Part of the discussion about modernising social services resulted in the decision to review our in-house services.

Earlier this year, we started what we called a 'listening and engagement phase'. There was discussion with each individual service user and their family who might be affected by any potential future changes, and this included an assessment of their needs and the potential availability of suitable alternative provision to meet those needs in the event that the council decided not to maintain the status quo.

There was detailed scrutiny of the information gathered from these reviews, and discussions with staff and other stakeholders (see supporting documents <https://www.denbighshire.gov.uk/consultations> on the consultation section of the DCC website.) Following this, the Elected Members in the Task & Finish Group looking into this:

- developed an options appraisal for each of the individual in-house services
- agreed that there be a wider engagement exercise on the future modernisation of social services and
- recommended that we hold a formal consultation with all stakeholders, including the public, about the future of our in-house services.

The information gathered from the consultation will be added to that gathered during the listening and engagement phase and will help Elected Members to reach a decision about the future of our in-house services in early 2016. There are 4 separate consultations, one on each of the following:

- **Hafan Deg** day care centre in Rhyl
- **Dolwen** residential care home and day care centre in Denbigh
- **Awelon** residential care home and day care centre in Ruthin
- **Cysgod y Gaer** residential care home and day care centre in Corwen

## **2. What you have told us so far**

During the listening and engagement (pre-consultation) phase we learned a great deal from residents, tenants, service users (and their families/friends and advocates) and staff in the establishments where we currently provide care and/or support. Details of what we learned can be found within the supporting documents in the consultation section on the DCC website:

<https://www.denbighshire.gov.uk/consultations>

It is evident from all our discussions that the services and support provided at all our council-run residential care homes and day centres are greatly valued. Many respondents requested that we explore ways in which the services could be continued in the future, albeit in a different way if necessary.

The bilingual staff teams and the accessibility of the residential care homes, particularly to those without transport, are particularly important to those who

responded in the pre-consultation phase. It became apparent that many residents would be adversely affected if they were asked to leave their homes now.

Consequently, our Cabinet agreed that, whatever decisions are made about any future changes, no individual service user will be asked to move from their current home unless a suitable alternative is identified where their needs can be met.

There are currently 25 residential care homes in Denbighshire, as well as 7 nursing homes and others who specialise in Elderly Mental Health (EMH) care. Despite this apparent availability of potential alternative provision, it is evident from the pre-consultation exercise that location is critical for many people, and that many families and friends would find it difficult to visit residents who live far from their current homes.

However, it is also clear from the reducing numbers of people needing to be supported in residential care homes, and the waiting lists for Extra Care Housing, that demand for care and support amongst older people has changed in recent years. This is why we are looking to change our focus and aim to provide more Extra Care Housing and fewer residential care beds in the future. Extra Care Housing provides care and support to tenants with varying levels of need. This can be adapted as tenants' needs change. Reablement and occupational therapy equipment is available in Extra Care Housing, and staff are on call 24 hours a day to assist with personal care including the use of hoists and assisted bathing equipment where required. Further details about Extra Care Housing in Denbighshire is available from the following housing association providers: Wales and West Housing Association, Grwp Cynefin; and Clwyd Alyn

<http://www.wwha.co.uk/About-Us/Our%20Services%20for%20Older%20People/Pages/What-is-extra-care.aspx>

<http://www.grwpcynefin.org/en/chwilio-am-gartref/extra-care-housing/>

<http://www.clwydalyn.co.uk/extra-care/>

The needs and expectations of older people are changing. Older people generally do not wish to move into residential care anymore, and they would prefer to remain at home or move into extra care housing. We also believe that it is much better for the wellbeing of older people to be supported to remain as independent as possible for as long as possible within their own homes, as opposed to being placed in residential care. We believe that there should be no need for anyone to live in a standard residential care home in future. There will always be a need for nursing homes and specialist EMH residential care homes. However, we believe that people with a wide range of low-level needs would be better supported in their own home or in an extra care housing environment in future.

If we were to make no changes to our current services, it seems likely that the waiting lists for extra care housing properties would continue to grow while the numbers of vacancies in residential care homes and day centres would increase. The number of adults supported by the council in residential care on 31<sup>st</sup> March 2015 was 499, down from 579 on 31<sup>st</sup> March 2012.

Furthermore, if no changes are made to existing services, Community Support Services (the department which manages in-house social care services in Denbighshire) would need to find additional savings from other areas to avoid exceeding its budget. Significant savings have already been made in this department, and there is a risk that further savings in other areas would have a negative impact on the health and safety of service users.

There are currently plans to develop Extra Care Housing in Denbigh to satisfy demand in that town, and there is a high demand in other areas in the south of the county, with approximately 35 people currently on the waiting list for Llys Awelon in Ruthin, and many enquiries for facilities further south in the county.

The Council and Betsi Cadwaladr University Health Board are also working together to ensure that people's joint health and social care needs can be met more effectively without bureaucracy getting in the way. Further detail is available in the supporting documents.

### **3. The consultation process and next steps**

The consultation will be open from 16<sup>th</sup> October 2015 to 17<sup>th</sup> January 2016, after which all information will be collated and presented to the Elected Member Task & Finish Group in early 2016. The group will discuss the information gathered and will make subsequent recommendations on options to present to the Scrutiny Committee and then Cabinet in spring 2016.

### **4. Equality Impact Assessment**

A full Equality Impact Assessment can only be completed after considering the information that comes back from the formal consultation. This will therefore be completed and presented to the Elected Member Task & Finish Group, the Scrutiny Committee and Cabinet to help inform any subsequent proposals and/or decisions for change. The 'listening and engagement' phase has already indicated that there would be a negative impact on many older individuals who currently use those services should they need to move.

However, for future service users and the general population at large, we believe that modern alternative services would mitigate against any potential negative impact on groups who share protected characteristics. We therefore hope that the consultation exercise will:

- i. Help us to learn what the impacts will be on people, communities, local businesses, etc., and identify what mitigation for negative impacts is possible.
- ii. Identify if responders perceive that the proposals might have a greater impact on them than other people; and if so, why.

## **Individual Consultations**

### **Introduction**

Denbighshire County Council needs to make decisions that ensure that adult care services make best use of its limited resources whilst meeting the higher standards expected by current and future service users.

As part of a wider consultation on the modernisation of social services in Denbighshire, the council is consulting specifically on options for the future of Hafan Deg, Dolwen, Awelon and Cysgod y Gaer.

The council will take into account everyone's views and look at all relevant documents, duties and guidance before making a decision. This is likely to be made in spring 2016.

This document sets out the options and asks you for your opinion on them. It also asks you to put forward any other ideas you might have.

### **When does the consultation period start and finish?**

The consultation process begins on 16<sup>th</sup> October 2015 and will be open until 17<sup>th</sup> January 2016. Please ensure that you return your responses by that date.

### **What happens after the consultation?**

After the consultation period ends, all the information will be collated, analysed and presented to the Elected Member Task & Finish Group in early 2016. The group will discuss the information gathered and will make subsequent recommendations on options to present to Scrutiny Committee and then Cabinet in Spring 2016.

### **What if I have some questions or want some further information on the options?**

Further detail about the council's proposals is available on our website consultation page <https://www.denbighshire.gov.uk/consultations>, along with supporting documents which include:

- The cabinet report and all appendices, including draft equalities impact assessment
- Feedback from pre-consultation listening and engagement exercise from stake holders including service users, their family/friends/advocates and staff
- Information on the demand for services
- Information on the implementation of the Social Services and Well-being (Wales) Act in April 2016

For further information, please contact the Customer Connections Team on 01824 708090 or email: [ssdcomments@denbighshire.gov.uk](mailto:ssdcomments@denbighshire.gov.uk)

## How to Respond

There are a number of ways you can make a contribution to the consultation:

- Attend one of the public consultation meetings to be held on the following dates: between October 16<sup>th</sup> 2015 and January 17<sup>th</sup> 2016.

18<sup>th</sup> November – Canolfan Awelon, Ruthin

25<sup>th</sup> November – Rhyl Football Club

30<sup>th</sup> November – Canolfan Ni, Corwen

14<sup>th</sup> Jan – Eirianfa Community Centre, Denbigh

There will be meetings between 2.30-4.00 & 6-7.30pm

A schedule of meetings is with the supporting documents on the consultation pages of the website <https://www.denbighshire.gov.uk/consultations> and will be advertised locally.

- Attend an individual meeting to discuss your views (which families, advocates and/or carers may attend). Please contact the Customer Connections Team on 01824 708090 or email: [ssdcomments@denbighshire.gov.uk](mailto:ssdcomments@denbighshire.gov.uk) to arrange this.
- Go to the council's website <https://www.denbighshire.gov.uk/consultations> where you can find background information and the consultation response form.
- By phone - call the helpline on 01824-70 80 90
- By email – [ssdcomments@denbighshire.gov.uk](mailto:ssdcomments@denbighshire.gov.uk)
- The consultation response forms can be returned to the email address above or can be sent to the following address:

Customer Connections Team  
Denbighshire County Council  
Russell House  
Churton Road  
Rhyl  
Denbighshire  
LL18 3DP

- If it is easier for you, your form can be handed in to the Manager of the scheme that your response relates to:

Rob Gilmour  
**Hafan Deg Day Centre**  
War Memorial Court  
Grange Road

Rhyl  
LL18 4BS

Nest Vaughan Evans  
**Dolwen**  
Ruthin Road  
Denbigh  
Denbighshire  
LL16 3ER  
Viv Barlow  
**Awelon Care Home**  
School Road  
Ruthin  
LL15 1BN

Sian Owen  
**Cysgod y Gaer**  
Corwen  
Denbighshire  
LL21 9AD

They will forward your responses on to the consultation team.

### **Help with your response**

If you need help understanding the proposals or providing your response, the following sources of support are available from the council:

- **Single Point of Access and Locality Teams** - social care staff can offer advice on assessments and alternative provision. If you need help because of visual or hearing impairments, or with translating or interpreting because Welsh/English is not your first language, we will arrange that for you. Please contact the Customer Services Team on 01824-70 80 90 or email: [ssdcomments@denbighshire.gov.uk](mailto:ssdcomments@denbighshire.gov.uk) to arrange this.
- The following independent organisation is able to provide support and to help you during the consultation:

**Age Connects** – provide advocacy services for older people who may want someone independent to represent them or to support them through this process. Advocacy services are particularly suitable for older people who may not have family or friends; or whose family or friends are not local and are not able to maintain contact. You can contact them: by **email** to: [enquiries@acnwc.org](mailto:enquiries@acnwc.org), by **phone** on: 01745 816947 or by **post** or by dropping in to:

Age Connects North Wales Central  
15 Bridge Street



Denbigh  
Denbighshire  
LL16 3LF

*This service is provided free of charge for older people.*

- Alternatively, if you want to talk to someone about the proposals or about how these may affect you or a friend or relative, you can contact the consultation team using the information below:

**Telephone:** 01824 708090

**E-mail:** [ssdcomments@denbighshire.gov.uk](mailto:ssdcomments@denbighshire.gov.uk)

**Letter:**

Customer Connections Team  
Denbighshire County Council  
Russell House  
Churton Road  
Rhyl  
Denbighshire  
LL18 3DP

## **Hafan Deg**

### **Background**

Earlier in the year two independent social workers (i.e. not employed by Denbighshire County Council) looked at a range of criteria for the 24 individuals who, at the time, attended Hafan Deg between 1 and 3 days per week. They found that most individuals require medium or high level support (please see supporting documents).

Locally, there is a range of existing community alternatives which are already used by a few of the individuals, as well as a number of residential care homes that offer day care, albeit on an ad hoc basis at present. While most individuals expressed a view that they would not want to use other services, alternatives are available which could meet their needs. It would also be possible to contract for a bespoke service that would enable those individuals who require that level of care to continue to meet their friends together.

We know the services are valued by those who use them, their families and friends, and that this is an unsettling and stressful time for all involved. This uncertainty also affects other users of Hafan Deg including tenants in the surrounding sheltered housing scheme and groups like Deafblind Cymru and the Deaf Association who have been using the building for many years and value the support provided. We apologise for any distress this may cause.

However, there are a variety of reasons that the council must consider the future of Hafan Deg, as the cost to the council of delivering day care through its own centre is higher than it can secure in the independent sector. Furthermore, demand for day care places is falling and so the number and cost of spaces is likely to increase. Conversely, there is evidence that there are increasing levels of loneliness and social isolation, suggesting a need to increase the level of informal, non-care related, day time activities in the local area.

### **What options are being considered?**

- 1) One solution for Hafan Deg is to enter into a partnership with an external organisation and transfer the building to them, commissioning a day care service within the building and, in addition, enabling 3<sup>rd</sup> sector agencies to provide early intervention activities for older people that reduce social isolation, support independence and promote resilience.***

This would have the following consequences:

- This would enable the building to continue to be used for the benefit of older people in Rhyl, including those with low level needs who currently attend, while supporting the principle of promoting independence and enabling the existing group of service users to continue to attend together, with the same staff group.
- There would be a revenue saving of £100k on the current running costs.

**2) *Another solution is to re-provision services at Hafan Deg with the potential that the centre would close and the service users and their families be supported to find suitable alternative provision.***

This would have the following consequences:

- The council would still be able to meet the current demand for day care but this would be provided through a mixture of council and independent providers.
- It would reduce the overall cost of providing day care and contribute to the necessary savings in the service to address the current council savings targets. There would again be a revenue saving of £100k on the current running costs.
- The cost of current vacancies within day care centres means that current resources are not being used as effectively as possible. This would resolve this problem.
- The council accepts that this change would mean disruption for the users of the centre if this proposal was to be adopted. The council would carry out further individual assessments of every service user and find alternative provision in a sensitive and timely manner with the involvement of service users and families where possible. The council would ensure that it complies with all its legal duties to its service users. The views of attendees would be sought and they would be helped to find suitable alternative provision that meets their needs.

If the decision was made to close or transfer the unit, a closure or transfer plan would be agreed, subject to consultation and approval. Statutory consultation with staff would take place.

If a decision was made to close Hafan Deg it would not close until all the service users' needs had been fully reviewed and suitable alternative provision found.

**3) *Any Other Option or Alternative***

**No final decision on the options has been made.** The council is open to consider any other alternative or option you wish to put forward that meets the demand for day care places and social activities within the available resources. There is a section on the survey for any new ideas, but you may also send them to us in any other format to the Customer Connections Team (details in the introduction).

All alternative submissions will be evaluated for their viability before being considered with the options we have put forward.

## **Dolwen**

### **Background**

Independent assessors (not employed by Denbighshire County Council) looked at a range of criteria for the 22 individuals who, at the time, were placed in this 30 bed standard residential care home, including Welsh language, available alternatives and relationship with local community. The report, which showed that most people would be impacted to some degree if moved, can be found in the supporting documents.

At the time of writing, there were 13 vacant standard residential beds in a reasonable distance from Dolwen, and there were no vacant Elderly Mental Health (EMH) or nursing beds.

We know the services are valued by those who use them, their families and friends, and that this is an unsettling and stressful time for all involved. We apologise for any distress this may cause.

However, there are a variety of reasons that the council must consider the future of Dolwen, as the cost to the council of delivering care through its own buildings is higher than it can secure in the independent sector. Furthermore, demand for places is falling and so the number and cost of spaces is likely to increase.

### **What options are being considered?**

#### ***1) One solution for Dolwen is to enter into a partnership with an external organisation and transfer the whole service to them, while registering for EMH care.***

- This would ensure that individuals living there could continue to do so, supported by the same staff as they currently are and accessing the local community as much as they do now.
- There would be a revenue saving of £92k on the cost of care for the existing 22 individuals and £75K on maintenance costs as the new provider would be commissioned using standard rates.
- However, this means that it is unlikely that there would be a capital receipt as the new provider would need to spend a lot of money to ensure the building meets minimum standards.
- It would also develop a level of EMH provision in the area, a growing area of demand. Plans for the development of Extra Care Housing within the town will continue.

**2) *Another solution is to lease or sell Dolwen for another purpose. The home would close and the service users and their families be supported to find suitable alternative provision.***

This would have the following consequences:

- It would reduce the overall cost of providing residential care and contribute to the necessary savings in the service to address the current council savings targets. There would again be a revenue saving of £92k on the cost of care for the existing 22 individuals and £75K on maintenance costs.
- The cost of current vacancies within residential care centres means that current resources are not being used as effectively as possible. This would resolve this problem.
- The council accepts that this change would mean disruption for the residents and their families if this proposal was to be adopted. The council would carry out further individual assessments of every service user and find alternative provision in a sensitive and timely manner with the involvement of service users and families where possible. The council would ensure that it complies with all its legal duties to its service users. The views of attendees would be sought and they would be helped to find suitable alternative provision that meets their needs.

If the decision was made to close or transfer the unit, a closure or transfer plan would be agreed, subject to consultation and approval. Statutory consultation with staff would take place.

If a decision was made to close Dolwen it would not close until all the service users' needs had been fully reviewed and suitable alternative provision found.

**3) *Any Other Option or Alternative***

**No final decision on the options has been made.** The council is open to consider any other alternative or option you wish to put forward that meets the demand for residential and day care places within the available resources. There is a section on the survey for any new ideas, but you may also send them to us in any other format to the Customer Connections Team (details in the introduction).

All alternative submissions will be evaluated for their viability before being considered with the options we have put forward.

## **Awelon**

### **Background**

The independent assessors (not employed by Denbighshire County Council) looked at a range of criteria for the 20 individuals who were, at the time of writing, placed in this 26 bed standard residential care home, including Welsh language, available alternatives and relationship with local community. The report, which found that most people would be impacted to some degree if moved, is one of the supporting documents.

There were 8 vacant nursing beds and 8 vacant standard residential care beds in a reasonable distance from Awelon.

We know the services are valued by those who use them, their families and friends, and that this is an unsettling and stressful time for all involved. We apologise for any distress this may cause.

However, there are a variety of reasons that the council must consider the future of Awelon, as the cost to the council of delivering care through its own buildings is higher than it can secure in the independent sector. Furthermore demand for places is falling and so the number and cost of spaces is likely to increase.

### **What options are being considered?**

***1) One solution for Awelon is to stop new admissions and work with the individuals and their families, at their own pace, to move them to suitable alternatives as appropriate and to enter into a partnership with the owner of Llys Awelon to develop additional Extra Care apartments on the site.***

- This would ensure that individuals living there have plenty of time to find appropriate alternative provision
- It would enable the demand for additional Extra Care in Ruthin (currently 35 people waiting) to be met if a registered social landlord would agree to develop such a provision.
- There would be a requirement on the landlord to ensure that the community activities currently provided at Canolfan Awelon would continue.
- There would be a revenue saving of £280k on the cost of care, as well as a £165k maintenance saving.

**2) Another solution for Awelon is to work in partnership with a registered social landlord, health services and the 3rd sector to develop a range of services, transferring half of the building to develop additional extra care flats, possibly as an extension to Llys Awelon, while using the remainder as a small residential unit which could be used to meet the increasing need for respite care and to ensure that no existing resident would need to move unless they chose to.**

- This would ensure that individuals living there could continue to do so, supported by the same staff as they currently are and accessing the local community as much as they do now.
- It is unlikely that there would be a capital receipt as a lot of money is needed to ensure the building meets minimum standards. The unit cost of providing small residential homes is very high and this could keep a question mark hanging over the service.
- It would help to meet the growing demand for the development of Extra Care Housing within the town.

Options 1 & 2 would have the following consequences:

- It would reduce the overall cost of providing residential care and contribute to the necessary savings in the service to address the current council savings targets.
- The cost of current vacancies within residential care centres means that current resources are not being used as effectively as possible. These options would resolve this problem.
- The council accepts that change would mean disruption for the residents and their families if either of these proposals were to be adopted. If necessary, the council would carry out further individual assessments of every service user and find alternative provision in a sensitive and timely manner with the involvement of service users and families where possible. The council would ensure that it complies with all its legal duties to its service users. The views of attendees would be sought and they would be helped to find suitable alternative provision that meets their needs.
- If the decision was made to close or transfer the unit, a closure or transfer plan would be agreed, subject to consultation and approval. Statutory consultation with staff would take place in early 2016
- If a decision was made to close Awelon it would not close until all the service users' needs had been fully reviewed and suitable alternative provision found.



3) ***Any Other Option or Alternative***

**No final decision on the options has been made.** The council is open to consider any other alternative or option you wish to put forward that meets the demand for residential and day care places within the available resources. There is a section on the survey for any new ideas, but you may also send them to us in any other format to the Customer Connections Team (details in the introduction).

All alternative submissions will be evaluated for their viability before being considered with the options we have put forward.

## **Cysgod y Gaer**

### **Background**

Independent assessors (not council employees), looked at a range of criteria for the 11 individuals who were at the time, placed permanently in this 23 bed standard residential care home, including Welsh language, available alternatives and relationship with local community. The report, which found that most people would be impacted to some degree if moved, is part of the supporting documents.

There are no alternative residential services to Cysgod y Gaer in a reasonable distance.

We know the services are valued by those who use them, their families and friends, and that this is an unsettling and stressful time for all involved. We apologise for any distress this may cause.

However, there are a variety of reasons that the council must consider the future of Cysgod y Gaer, as the cost to the council of delivering care through its own buildings is higher than it can secure in the independent sector. Furthermore, demand for places is falling and so the number and cost of spaces is likely to increase.

Please read the following information about the options being considered and complete the attached survey to provide us with your views.

### **What options are being considered?**

***1) One solution for Cysgod y Gaer is to enter into a partnership with relevant stakeholders (including BCU and the 3<sup>rd</sup> sector) to develop the site into a 'support hub' offering both residential and extra care type facilities as well as an outreach domiciliary care and support service to the tenants of local Sheltered Housing Schemes and the wider population of Corwen and the surrounding area.***

- This would ensure that the individuals living in Cysgod y Gaer currently can continue to do so
- This option develops services that support independence and improved outcomes for others in the local area.
- While this would result in no immediate saving, it would bring together elements of external domiciliary care with residential services, creating a holistic support offer to a low demand area much more cost effectively. This may result in savings on the current costs of external domiciliary care.

**2) *Another solution for Cysgod y Gaer is to stop new admissions and work with the individuals and their families at their own pace to move them to suitable alternatives as appropriate and to enter into a negotiations with registered social landlords to develop Extra Care apartments on the whole site.***

- This would ensure that individuals living there have plenty of time to find appropriate alternative provision
- It would enable the demand for additional Extra Care to be met if a registered social landlord would agree to develop such a provision.
- There would be a request for the landlord to ensure that the community activities currently provided at Cysgod y Gaer would continue.
- The council accepts that change would mean disruption for the residents and their families if this proposal was to be adopted. If necessary, the council would carry out further individual assessments of every service user and find alternative provision in a sensitive and timely manner with the involvement of service users and families where possible. The council would ensure that it complies with all its legal duties to its service users. The views of attendees would be sought and they would be helped to find suitable alternative provision that meets their needs.
- If the decision was made to close or transfer the unit, a closure or transfer plan would be agreed, subject to consultation and approval. Statutory consultation with staff would take place
- If a decision was made to close Cysgod y Gaer, it would not close until all the service users' needs had been fully reviewed and suitable alternative provision found.

**3) *Any Other Option or Alternative***

**No final decision on the options has been made.** The council is open to consider any other alternative or option you wish to put forward that meets the demand for residential and day care places within the available resources. There is a section on the survey for any new ideas but you may also send them to us in any other format to the Customer Connections Team (details in the introduction).

All alternative submissions will be evaluated for their viability before being considered with the options we have put forward.