## Co-operative Executive – 16<sup>th</sup> March 2022 Maintaining a Stable Adult Social Care Market

Sheffield City Council believe its important to listen to providers and share providers views. To that end we have arranged for views expressed from providers to be enclosed as a supplementary report to the Cooperative Executive.

Attached are letters and emails received from providers.

- 1. Letter from Burton Street Foundation Trustees (text reproduced below)
- 2. Letter from Burton Street Foundation (Appendix 1)
- 3. Email from Sheffield Care Association (Appendix 2)
- 4. Letter from Sheffield Care Association dated 15/03/2022 (Appendix 3)
- 5. Letter from Sheffield Care Association dated March 2020 (Appendix 4)

14th March 2022 Members of the SCC Co-op Executive

**Dear Sirs** 

Re - Recommended 3.13% uplift for Day Service Providers.

The Burton Street Trustees are extremely concerned about the recommended, totally inadequate uplift of 3.13% for Day Service Providers. Burton Street Foundation (BSF) need to pay staff at least the Real Living Wage. The consequences of a 3.13% uplift in the face of an increase to the National Living Wage rates of 6.62%, additional National Insurance Contributions of 1.25% plus increases to energy and building cost will have dire repercussions.

BSF and other Care Providers support very vulnerable people who do not always have the same opportunities in life without enthusiastic dedicated staff teams. Yes we can clap our hands and thank the staff teams but often they face real financial difficulties and often for this reason, reluctantly have to leave our care services. Apart from providing an improved quality of life to vulnerable people and families, it would be considerably more expensive if people had to be moved to much higher levels of support services due to family breakdowns, as a consequence of reduced opportunities for families to access day services in the city.

As Burton Street Foundation Trustees we ask on behalf of all vulnerable people in Sheffield to reject the proposal of 3.13% uplift and consider a higher percentage increase, to reflect the needs of the providers.

Regards

**Burton Street Foundation Board of Trustees** 

This page is intentionally left blank

57 Burton Street Hillsborough Sheffield S6 2HH 0114 233 2908 admin@burtonstreet.org.uk www.burtonstreet.org.uk

10th March 2022

Dear SCC Co-operative Executive,

### Re: Recommended 3.13% uplift to fees for Day Service Providers

I would like this letter to be read out at the Co-operative Executive meeting on 16<sup>th</sup> March 2022 or if not, to be distributed to all members of the Co-operative Executive group prior to or during the meeting on 16<sup>th</sup> March 2022, when they will be considering the proposals prepared by John Macilwraithe and Joe Horobin on the level of increase to fees for Day Services within the City.

I have requested an urgent meeting with George Lindars-Hammond to discuss the proposed fee uplift for Day Service providers and urgent issues affecting the Care sector in Sheffield more generally, so that he can represent the concerns that I raise, and wait for him to contact me.

If the proposed uplift is agreed by the Cooperative Executive members on 16<sup>th</sup> March 2022 this will affect thousands of staff that work in Care, hundreds of Providers and potentially put at risk essential services for many of the City's most vulnerable residents.

I understand fully the constraints on Council finances, but I also know first hand how the crisis in Social Care is already affecting Providers (Employers) and the dedicated staff working within social care. The consequences of approval of an uplift to fees of just 3.13% in the face of an increase to National Living wage rates of 6.62%, National insurance contributions of 1.25% plus massive increases to energy and building costs will be stark and fast.

One of comparators that we use is to look at is the difference between our rate of pay for Support workers and the Real Living wage. This year with only a 3.13% increase, we actually get further away from that goal. We would be 4.2% below, rather than 3% has been the position for the last 2 years. We understand that Sheffield City Council has committed to paying the Real Living Wage and has only recently agreed to pay it to their directly employed staff from 1st April 2022, however many providers to SCC are unable to pay this rate.

This letter follows a zoom meeting with Joe Horobin and John Macilwraithe on Tuesday 8<sup>th</sup> March 2022to discuss the process for annual fee uplifts and the pressure that this is putting on Providers such as Burton Street.

The following points were made in an email to Cllr George Lindars-Hamond 9<sup>th</sup> March 2022 explaining how the delays in communication about an uplift to fees from April 2022 have put onto providers such as Burton Street.

We have had no updates (until yesterday) despite asking for them constantly since November 2021. We are now in a position where we have to present budgets to our trustees on Thursday 17th March, within 24 hours of the Exec Council meeting where the Fee uplifts will be discussed and potentially agreed. Like Sheffield City Council our budget year commences 1st April 2022, so you can see how time pressured this is.

At our meeting yesterday afternoon we were informed what is going to be recommended to the Exec team and this is what leads me to write to you to arrange an urgent meeting.











We were informed the recommendation is that Day service providers will get an uplift of around 3.1%. This is far below expectations and will cause huge pressure on a sector which is already in peril. This will allow Burton Street to pay only 29p to our very low paid staff, getting them to the new National Living Wage of £9.50 only. We are aware that other fairly local core Cities being Manchester and Leeds have taken the decision to pay care staff the Real Living Wage of £9.90 per hour, and indeed last week Sheffield City Council agreed to pay this to their own directly employed staff on SCC current minimum rate of £9.30 which equates to an increase of 60p per hour. Essential care providers in the VCS are not able to increase wages by the same level based on the proposed percentage increase, which is not only insulting but will push many more employees and their families into financial hardship and potentially escalate Care Providers to close their doors.

We were told yesterday that SCC wanted to do more and wanted to get to a stage where they could fairly reward a smaller Care Sector in the City. That the City wanted to proceed more quickly with 'early intervention and prevention' agendas all of this I understand and support. However, to do this by exploiting the lowest paid members of our society and keeping them in perilous hardship seems very unfair. Our staff and those of other Care Providers have been thanked, recognized and lauded for the preventative nature of our work over the past 2 years, supporting very vulnerable clients and their families and preventing escalation to more expensive crisis or respite services. Now these seem to be just words, easily spouted but without any meaning.

Our wonderful staff team work hard, they support some of the City's most vulnerable and give them a fantastic quality of life in the superb range of services we provide, they provide essential respite so that families can cope and manage largely unsupported at home.

At the same time, our staff retention rates are now lower than they have ever been and we are constantly recruiting. Many leavers state that they love the work that they do but pay is the reason that they need to leave us and this is not just support workers but team leaders and managers as well. Many have second jobs to make ends meet to enable them to support their families or study for degrees to enable them to move to higher paid sectors. This impacts on their mental and physical health and leads to higher levels of burnout. We have staff using food banks, and asking for advice on benefits. We now provide very low cost options for staff in our café at lunchtime to make sure that they can eat whilst at work for £1.00. We have started to get desperate requests for advances to wages to enable bills to be paid and I could go on...

3.1% is totally inadequate in the current climate and it reinforces low morale and feelings that Care staff have again been forgotten. On my staff's behalf, I am disappointed in Sheffield "The Fair City" and very fearful of the future. I can see more staff leaving, more care providers closing their doors, more anger, more desperation and years more exploitation of the lowest paid whilst the City Council and NHS try to progress further with strategies to 'intervene earlier and prevent' being willing to risk essential services for some of the most vulnerable in Sheffield in the meantime. We are asked to be creative, which is very hard to achieve with demoralised staff and Managers focused on organisational survival. Burton Street Foundation deliver results on a daily basis on early intervention and prevention, which seems largely now to be forgotten. We do this as a proud 'not for profit' organisation, one which Sheffield should be proud of, operating at around a 1% profit margin with open book accounting. We will now start to calculate the impact that this 3.1% increase in fee uplifts will have on our sustainability, in the face of large increases to National Living wage rates and National Insurance, and steep increases to energy costs without these costs being fully covered by proposed fee uplifts. We are happy to share these illustrations once completed to demonstrate why we have been pushing for a much higher uplift in fees.











I am not sure what more I can do at this time. I have given evidence and facts in consultations, been active and honest about the state of the sector in all the conversations and meetings I have had. One thing I hope to be able to do is to meet with you as the Executive Member for Health and Social Care to explain to you our position and that of our staff and fellow providers, before this proposal goes to the meeting of SCC Exec group next Wednesday 16th March. When I hope the proposals will be roundly rejected and sent back after reflection for urgent review.

Yours respectfully

Clare Mappin

Managing Director

The Burton Street Foundation Ltd

Clave Magn.











This page is intentionally left blank

From: Leroy Young <Leroy@silver-healthcare.co.uk>

**Sent:** 14 March 2022 09:04

To: committee@sheffield.gov.uk

Subject: FW: SCC Proposed Fee Increase

Follow Up Flag: Follow up Flag Status: Completed

Dear SCC/Alexis/Joe.

We have had chance to review the report that was issued to providers on Friday 11<sup>th</sup> March and need to raise serious concerns to the council about the proposed increase.

- The association has had significant dialogue with SCC and they are aware of the financial pressures on Providers, the 3.13% Increase does not sustain the market.
- SCC are fully aware of the additional costs for Insurance, Gas, Electricity, Water, Food & Waste etc the 3.13% increase does not cover these!
- National Minimum Wage SCC knew that from the additional 4.2 Million awarded in 2021 providers were unbale to pass this onto staff.
- National Minimum Wage The increase of 3.13% will not be sufficient to fund the increase
- IPC/RFT/WRRF Grants are due to end
- SCC are still ranked at the bottom of the Bed Fee table, how can Sheffield continue with this approach?
- Nothing in the report regarding the 1.25% National Insurance increase are providers to fund this from the 3.13%
- The report was released again on a Friday the 11<sup>th</sup> giving us just two days over a weekend to submit our response this is wrong!!

I'm sure we speak for all providers in Sheffield and not just the members providing Adult Social care, Home Care, Day Care etc when we say the increase is totally inadequate and if approved will have serious consequences on the viability of the sector in Sheffield.

It's time to wake up and realise the damage being caused by suppressing the funding in Sheffield – we have endured for too long and this needs to be addressed today not next year!!

Regards.

# **Sheffield Care Association.**



**Please note:** This email together with any files transmitted with it, are intended solely for the use of the individual or entity to whom it is addressed. Any unauthorised dissemination of copying of this email or its attachments, and use or disclosure of its information is strictly prohibited, and may also be illegal. If you have received this in error, please notify <a href="level">level</a> <a href="mailto:level">level</a> <a href="mailto:level">level</a



#### 15 March 2022

### To the Cooperative Executive

Please find below a response on behalf of the Sheffield Care Association (SCA) in respect of the recently published report for Cabinet relating to the annual uplift of fees for the financial year 1<sup>st</sup> April 2022 – 31<sup>st</sup> March 2023. Before I begin, I would like to say this letter does not contain an exhaustive list of all of our concerns, but an outline of these that we could produce within the timescales provided bearing in mind we were only provided with the report at 10am on Friday 11<sup>th</sup> March with a response required by 9.30am on Monday 14<sup>th</sup> March. On any level, this is insufficient time to allow us to collate a fully considered response.

By way of an introduction; the Sheffield Care Association is a membership organisation for people and organisations that work in — or with - the care sector. Its role is to advocate for the **care** sector and champion the work **care** providers do every day to help, support and look after people in **Sheffield** — including some of our most vulnerable people. We represent over 1,200 beds which equates to almost 30% of the total elderly care beds in the City. In light of the above report and insufficient response time provided, over 1,200 beds attended an emergency meeting and unanimously agreed that the recommended fee uplift is detrimental to the sector if ratified.

Whilst we welcome the decision to propose a higher level of fee, we are deeply concerned that the proposed increase does not go far enough to address the real and pressing concerns of providers. We are concerned that the summary report provided to Cabinet does not truly reflect the feedback of providers and does not portray the true challenges that providers face. Covid-19 has and also continues to have a significant financial impact upon the care home market which will continue to endue through 2022/23. Notwithstanding the increase in the proposal, it remains insufficient to provide for a viable and sustainable care home market in Sheffield.

Our primary concerns from reading the report are:

- Elements of the summary report do not take into consideration the information members of the SCA have provided. It does not fully provide the weight of concern amongst the providers we represent for the future of their Homes. The summary report includes the detailed provider feedback but do not fully take this information into consideration when setting the fees;
- Also, the proposal has been provided one working day before the deadline for comment. This
  does not comply with the legal framework surrounding lawful consultation. Rather, it feels
  like a rather crass attempt to be seen to be 'consulting' with providers, whereas failing do so
  in substance and in reality presenting what is now a 'fait accompli';
- Again, parts of the report are factually inaccurate, at page 89 it states that no providers
  provided open book accounts, and only one provider offered to do so separately but not as
  part of this exercise. This is untrue and incredibly misleading. On 3 February 2022, Country
  Court Care submitted their care home questionnaires, and it was queried how and in what

format the accounts could be submitted. A response was provided on 4 February 2022 stating the 'most providers have asked if they can just submit in a format that is most convenient for them to avoid duplication with different local authorities etc, so we can also accept in your own format whatever they may be'. The open book accounts were subsequently provided on 11 February 2022. Country Court Care are happy to provide evidence of this email exchange. The SCA have also consulted on this and a number of other members of the association have also provided their open book accounts and they would also be willing to provide evidence of this. It is therefore highly concerning that such information is being presented to the Cabinet when it clearly is inaccurate;

- The increase proposed at 3.13% which has been presented to link to investment in workforce and staff wages, is a great aspiration for us all to work towards. However, to link the enlarged increase to increasing pay now, fails to pay any or any adequate consideration to the financial pressures on the market at this time; costs per resident have never been higher. It is therefore impossible for providers to commit to this given the level of the Council's underfunding (even with the proposed increase) and suggest that the Council has fundamentally misunderstood and/or paid insufficient regard to the feedback provided on costs and occupancy. Indeed, higher costs per resident are recognised at the top of page 116, item 2.9;
- The report further acknowledges that CPI has been calculated at 3.1% as of September 2021. As of January 2022, this figure increased to 5.5% and is evidently likely to continually increase.
- The report acknowledges that the increase in fees has been calculated based on the 2017 Cost
  of Care exercise which is outdated and flawed. Little consideration has been given to increased
  costs of registration fees, insurance, utilities without focussing on the increased requirement
  for medical supply/equipment hire costs, which have been passed onto Care Home Providers;
- As the report for Cabinet references, current fees have been determined at an average level
  of operating efficiency of 80%. The fees set using the 2017 calculator is based on homes
  running at 90% occupancy. The formulation of the fee is therefore based upon a market which
  the Council is fully aware does not exist at this present time thus bearing no reflection to the
  current local economic conditions. This 10% difference needs to be accounted for and taken
  into consideration when determining the fees;
- Persisting with flat fee rates is non-sensical and, as the report mentions, Sheffield are one of very few Councils in the country to do this. The cost of caring for nursing residents or dementia residents is higher than for residential placements and hence when the weighted average of the fee is taken, this compares even more poorly against neighbouring authorities. Furthermore as the report demonstrates, Sheffield does not compare well to its neighbouring authorities despite this way of demonstrating its fees; however the way the data is presented does not demonstrate how poorly;
- National Living Wage (previously National Minimum Wage) alone has increased by more during the past 12 months than that being proposed, this is before even considering this year's NLW increase (which is an additional year on year increase of 6.6%). The fee increase proposed does not meet this additional cost which adds hundreds of thousands of pounds to our wage bill.
- With regards to National Insurance, the employers will be responsible for employers NI at a rate of 1.25%. This has not been accounted for in the report.

A number of our concerns have already been acknowledged and accepted in the report to Cabinet. Despite this, the Council still only recommends to Cabinet a minimal fee increase of 3.13%. With this recommendation and the increase in all around fees, it suggests that the Council are expecting providers to provide care at less than costs.

In addition to the above, the SCA have made continuous attempts to work with the Council to discuss the ongoing issues and pressures within the market. Monthly meetings were arranged with the Council however they are often cancelled at short notice. Attempts have been made by members of the SCA to rearrange without any or limited replies from the Council. We consider this conduct to be in direct conflict with the Council's "ambitions to deliver long term transformation in the city's care markets that improves outcomes for people and underpins the sustainability of the market".

As per the Government's recently issued guidance on Market Sustainability and Fair Cost of Care Fund for 2022 to 2023, a significant number of local authorities are paying residential and domiciliary care providers less than it costs to deliver the care received. While recognising the increase, the present proposals still remain insufficient and are considerably below an amount which is sustainable for providers in the long term; thus undermining the market contrary to the Council's section 5 statutory duty. We are deeply concerned that in its formulation of the fees for the coming year, the Council has failed to have proper regard to its statutory obligations and the guidance in reaching its funding decision.

It is noted than an additional £1.4 billion of funding is being provided over the next three years to assist local authorities with moving towards paying a fair cost of care. You will no doubt be aware that the 2022/23 funding, designed to ensure local authorities can prepare their markets for reform, requires local authorities to carry out a true cost of care exercise. We welcome your commitment to undertaking this true cost of care exercise within the next 6 months however we feel it would be appropriate for an interim award to be made as it would be unsustainable for the sector to continue to provide care based on these fees until April 2023.

It is essential that the Council sets sustainable fee rates. The care market is a critical front-line service and has been neglected by the Council over many years. All members of the Sheffield Care Association are passionate about the services they provide and are eager to work together with you to assist the Government with their proposals for reform and to ensure the fee setting process is fair and sustainable to meet the obligations required in 2022/23 and in the future.

We look forward to your prompt response and ask that this letter be placed before and drawn to the Cabinet's attention ahead of their meeting on Wednesday 16<sup>th</sup> March 2022.

Regards,

Sheffield Care Association

This page is intentionally left blank



12th March 2020

To Whom it May Concern,

Please find below a response on behalf of the Sheffield Care Association (SCA) in respect of the recently published report for Cabinet relating to the annual uplift of fees for the financial year 1<sup>st</sup> April 2021 – 31<sup>st</sup> March 2022. Before I begin, I would like to say this letter does not contain an exhaustive list of all of our concern, but an outline of these that we could produce within the timescales provided bearing in mind we were only provided with the report at 11:51am on Thursday 11<sup>th</sup> March with a response required by 9am on Monday 15<sup>th</sup> March. On any level, this is insufficient time to allow us to collate a fully considered response.

By way of an introduction; the Sheffield Care Association is a membership organisation for people and organisations that work in — or with - the care sector. Its role is to advocate for the **care** sector and champion the work **care** providers do every day to help, support and look after people in **Sheffield** — including some of our most vulnerable people. We represent 1530 number of beds which equates to almost 50% of the total elderly care beds in the City.

Whilst we welcome the decision to propose a higher level of fee increase than previously advised to care providers, we are concerned that the proposed increase does not go far enough to address the real and pressing concerns of providers. Many of these concerns are set out set out in detail in Appendix One of the report for Cabinet. We are concerned that the summary report provided to Cabinet does not truly reflect the feedback of providers and does not portray the true challenges that providers face, particularly in light of the impact of Covid-19. Notwithstanding the increase in the proposal, it remains insufficient to provide for a viable and sustainable care home market in Sheffield.

- The summary report is misleading. It does not fully provide the weight of concern amongst the providers we represent for the future of their Homes. The summary report skims over the detailed provider feedback and gives undue weight to matters which are favourable to the Council and presents the providers who have been negative as being in the minority. Also, the proposal has been provided two working days before the deadline for comment. This does not comply with the legal framework surrounding lawful consultation. Rather, it feel like a rather crass attempt to be seen to be 'consulting' with providers, whereas failing do so in substance and in reality presenting what is now a 'fait accompli';
- The increase proposed at 4.9%, which has been presented to link to investment in workforce and staff wages, is a great aspiration for us all to work towards. However, to link the enlarged increase to increasing pay now, fails to pay any or any adequate consideration to the financial pressures on the market at this time; costs per resident have never been higher. It is therefore impossible for providers to commit to this given the level of the Council's underfunding (even with the proposed increase) and suggest that the Council has fundamentally misunderstood and/or paid insufficient regard to the feedback provided on costs and occupancy. Indeed, higher costs per resident are recognised at the top of page 10/29 but then remarkably never addressed in the Council's replies;
- It is unclear, from the report for Cabinet, as to how the increase in fees that are being proposed this year have been calculated. This is important information without which we are not in a position to provider a fully considered response. We therefore ask for full disclosure as to how the Council has calculated and arrived at the fees it is now proposing. Using the Joseph Rowntree, Fair price for Care Calculator, we estimate the fee for Residential Care to be circa £591.01 and the fee for Nursing Care £643.17 (excluding FNC), hence would be keen to understand what assumptions and parameters the Council have used in setting their proposed fee;
- Furthermore there have been increased costs of registration fees, insurance, utilities without focussing on the increased requirement for medical supply/equipment hire costs, which have been passed onto Care Home Providers;
- As the report for Cabinet references, current fees have been determined at level of operating efficiency of 95% which is not present in the market, nor likely to be for some time beyond the forthcoming financial year. The formulation of the fee is therefore based upon a market which the Council is fully aware does not exist, bearing no reflection to the current local economic conditions. This is patently irrational and in breach of the Council's market obligations arising under section 5 of the Care Act 2014. This must be fully remodelled to properly reflect the impact that current occupancy levels have on costs and sustainability. This is information that has been requested but never provided. The Council relied on this model for determining historic fee rates and it is perverse to not apply the same adjusted model with updated inputs;
- Due to the lack of responses received to information requests by SCA, we instructed David Collins Solicitors to correspond with the Council on our behalf. To date, there remains no substantive response to the issues raised within David Collins' letter dated 18 December 2020 nor their letter dated 9 February 2021. Whilst the first of these letters is included within Appendix One to the Cabinet report, it does not feature in the report to Cabinet which I expect is what Cabinet members will read. Both of David Collins' letters contain legitimate relevant concerns raised by care providers and it is unreasonable that these have not been addressed by the Council despite a written undertaking to do dated 22 December 2020;
- Despite numerous requests we have still not seen the terms of reference provided to Cordis Bright or Kingsbury Hill Fox despite point 3.6 of the report to Cabinet stating that SCA have had input into the specification. The scope of works is key in determining how relevant this information is to the exercise and hence we cannot be sure that this work is being submitted in its full form nor in line with the scope. We are concerned that we are not seeing the full reports either and by default neither are the Council's members; and

• Persisting with flat fee rates is non-sensical and, as the report mentions, Sheffield are one of very few Councils in the country to do this. The cost of caring for nursing residents or dementia residents is higher than for residential placements and hence when the weighted average of the fee is taken, this compares even more poorly against neighbouring authorities. Furthermore as the report demonstrates, Sheffield does not compare well to its neighbouring authorities despite this way of demonstrating its fees; however the way the data is presented does not demonstrate how poorly.

As you will be well aware, section 5 of the Care Act 2014 (supported by statutory Guidance) sets out the Council's market shaping duties. These require the Council to promote the efficient and effective operation of the market, which requires regard to the importance of ensuring the sustainability of the market. See for example paragraph 4.6 of the statutory Guidance, which speaks to the need for local authorities to "ensure the market as a whole remains vibrant and sustainable".

Paragraph 4.31 of the statutory Guidance, underscores the nature of this obligation further:

"When commissioning services, local authorities should ensure themselves and have evidence that contract terms, conditions and fee levels for care and support services are appropriate to provide the delivery of the agreed care packages with the agreed quality of care. This should support and promote the wellbeing of people who receive care and support and allow for the service provider ability to meet statutory obligations to pay at least the national living wage and provide effective training and development of staff. It should allow attention of staff commensurate with delivering services to the agreed quality, and encourage innovation and improvement. Local Authorities, should have regard to guidance on minimum fee levels necessary to provide this assurance, taking account of the local economic environment. This assurance should understand that reasonable fee levels allow for a reasonable rate of return by independent providers that is sufficient to allow the overall pool of efficient providers to remain sustainable in the long term"

Further, the Statutory Guidance requires:

- Local authorities to "ensure the overall provision of services remains healthy" and to "understand the business environment of the providers offering services in their area and seek to work with providers facing challenges and understand their risks" [paragraphs 4.33 and 4.34].
- Local authorities to understand the impact that its approach to commissioning will have on the local market and mandates against local authorities undertaking any actions (which also includes any failure to act) which may threaten the sustainability of the market as a whole; such action being expressly stated to include the "setting of fee levels below an amount which is not sustainable for providers in the long-term" [paragraph 4.35].

While recognising the increase, the present proposals still remain insufficient. They are insufficient and considerably below an amount which is sustainable for providers in long term; thus undermining the market contrary to the Council's section 5 statutory duty. We are deeply concerned that in its formulation of the fees for the coming year, the Council has failed to have proper regard to its statutory obligations and the guidance in reaching its funding decision. To that end, please would you provide me with the following at your earliest please:

- As requested above Information as to how your fee has been calculated for the coming year including the full model of how fees were calculated in 2017 and how this has been revised to determine the fee for 2021/2;
- 2) What agreed 'care package' has been assumed in this calculation.

- 3) How this supports providers in meeting statutory obligations of paying National Living Wage; and
- 4) How the fee encourages 'innovation and improvement'.

It is essential that the Council sets sustainable fee rates. The care market is a critical front line service and has been neglected by the Council over many years. If the Council fails to increase the proposal and adopts it as a final decision, it will be acting unlawfully and in breach of its statutory duties to the market as a whole.

We look forward to your prompt response and ask that this letter be placed before and drawn to the Cabinet's attention.

Kind regards

**Sheffield Care Association**