

Service and Community Impact Assessment (SCIA)

Front Sheet:

Directorate and Service Area:

Corporate Policy on behalf of the Chief Executive

What is being assessed (e.g. name of policy, procedure, project, service or proposed service change):

Implementing a new Operating Model for Oxfordshire County Council

Responsible owner / senior officer:

The Chief Executive

Date of assessment:

August 2018

Summary of judgement:

The Operating Model as set out describes at a high-level the design of a new approach for overall council operations. In itself, this decision will not have a direct impact on residents or staff. However, the detailed implications and outputs of the Construct and Implement phase will impact on these groups

Detailed impact assessment and where appropriate user testing and consultation, will need to be undertaken throughout the Construct and Implement phases as each new service area is considered. High-level potential impact, initial mitigating activity undertaken through design and plans for further assessment throughout implementation are set out in the attached Service and Community Impact Assessment. This emphasises that full assessments and plans will need to be developed alongside detailed implementation planning.

Detail of Assessment:

Purpose of assessment:

This assessment has been undertaken ahead of a Cabinet decision to adopt a new operating model for the County Council.

Section 149 of the Equalities Act 2010 (“the 2010 Act”) imposes a duty on the Council to give due regard to three needs in exercising its functions. This proposal is such a function. The three needs are:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic, and those who do not.

Complying with section 149 may involve treating some people more favourably than others, but only to the extent that that does not amount to conduct which is otherwise unlawful under the new Act.

The need to advance equality of opportunity involves having due regard to the need to:

- remove or minimise disadvantages which are connected to a relevant protected characteristic and which are suffered by persons who share that characteristic,
- take steps to meet the needs of persons who share a relevant protected characteristic and which are different from the needs other people, and
- encourage those who share a relevant characteristic to take part in public life or in any other activity in which participation by such people is disproportionately low.
- take steps to meet the needs of disabled people which are different from the needs of people who are not disabled and include steps to take account of a person’s disabilities.

The need to foster good relations between different groups involves having due regard to the need to tackle prejudice and promote understanding.

These protected characteristics are:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race – this includes ethnic or national origins, colour or nationality
- religion or belief – this includes lack of belief
- sex
- sexual orientation
- marriage and civil partnership

Social Value

Under the Public Services (Social Value Act) 2012 the Council also has an obligation to consider how the procurement of services contracts with a life value of more than £173,934¹ might improve the economic, social, and environmental well-being of the area affected by the proposed contract, and how it might act to secure this improvement. However, it is best practice to consider social value for all types of contracts, service delivery decisions and new/updated policies. In this context, 'policy' is a general term that could include a strategy, project or contract.

Context / Background:

A report to Cabinet in September 2018 will set out work that has led to the development of a new Operating Model for the Council and summaries the business case for change. It will seek Cabinet approval to adopt the Operating Model as the basis for whole-council transformation, ahead of a future decision on the detail of investment in implementation.

Proposals:

The Operating Model contains proposals to redesign the County Council based on seven functional 'layers' which cut horizontally across services. These are set out in *Fig. 1* below.

The Business Case also incorporates proposals reviewing procurement and contract management for third party spend and for further commercialisation.

¹¹ [EC Procurement Threshold for Services](#)

Front Office	Pre-Front Door	Individuals, communities, members, the council and partner organisations working together to build resilience, develop strengths and create opportunities in local areas, which helps to reduce the need for council services.
	Customer Management	The customer management layer contains all activities undertaken by the council that involve interaction with customers and/or have an immediate impact on service delivery to customers.
	Customer Assessment	The customer assessment layer contains activities that are a key part of many customer interactions with the council, with information being used to decide whether and how services are provided.
Back Office	The Provision Cycle	The Provision Cycle layer provides the framework of processes and activities through which the Council decides how best to meet an identified need or to achieve a specific outcome, including commissioning, contracting and the management of third party suppliers.
	Enabling and support services	The Enabling & Support Services layer provides services that are optimised to meet the needs of internal customers through process improvement, the use of enhanced digital systems and clear delineation of roles and responsibilities.
	Strategic capability	The strategic capability layer provides the capabilities that the Council requires in order to define its vision, high level strategy and objectives, as well as capabilities required to support, manage and review the realisation of each of these.
	Business intelligence	The business intelligence layer provide information, intelligence and insight to a range of customers including businesses, partners and staff within the organisation.

Fig. 1: Operating Model Layers Summary

Evidence / Intelligence:

The Operating Model so far has been developed by service leaders and staff - making use of their detailed understanding of service and customer needs - supported by professional advisors. Regular reference has been made back to elected members (as set out in the report). At a cross-council level, extensive use of the Council's core evidence base and strategic framework has informed the direction and conclusions of the report, including the Corporate Plan, the Medium Term Financial Plan, JSNA and external inspection conclusions.

The proposals within the Operating Model are a high-level description of a new approach for overall council operations. In themselves, they do not directly amount to proposals that will impact on individual services users or staff. However, the detailed implications and outputs of the next proposed phase of activity, the 'Implement and Construct' phase, may impact on these groups. Detailed impact assessment will need to be undertaken throughout the Construct and Implement phases as each new service area is considered and through this process, detailed consideration of evidence of user groups of particular services and customer access channels will need to be assessed. Engagement, consultation and user testing will also need to be incorporated into delivery plans.

Alternatives considered / rejected:

The options set out in the report and the reasons for the final recommendation are replicated below:

	Description	Commentary
1	<p>Adopt the proposed Operating Model to enable delivery of the estimated range of savings (£34m-£58m) to the fullest extent appropriate – agree to the proposals as set out and go forward to identify options for delivery</p>	<p>Recommended – the business case sets out the costs and benefits of the model, the potential for improvements to resident outcomes and includes new ways to support prevention and minimise future demand contributing to long-term financial sustainability. Delivering the maximum benefits may create capacity to manage future pressures and for policy and investment choices. It will also help create a council that is agile and resilient to change with greater capacity to manage risk and deliver agreed political objectives.</p>
2	<p>Adopt the proposed Operating Model to enable delivery of required MTFP savings only, i.e. £33m – agree to implement the proposals only as far as required to deliver the MTFP savings without a requirement to deliver additional benefits</p>	<p>Not recommended – the business case does not support the case for not pursuing implementation to the furthest extent possible – when taking into full account the requirements of service delivery:</p> <ul style="list-style-type: none"> • Firstly, the costs of delivery are not related to savings on a linear basis - significant enabling investment is required, for example in technology, to release the initial savings; • Secondly, there are no proposals within the business case that are intended to lead to reduction in resident outcomes - rather, the range of savings shown throughout provides the flexibility for professional judgement and policy choices to be made during the construction phase where the Council will be able to assess the extent to which it thinks the Operating Model can be applied without impacting on outcomes. Where there is risk of impact, the model would not be applied, or changed, or the risk mitigated in some other way whilst maintaining overall benefits within the envelope identified. <p>Therefore, not taking the full possible savings obtainable, whilst making the significant enabling investment, would represent poor value for money.</p>
3	<p>Do nothing – deliver required MTFP savings through identifying service reductions and individual efficiency initiatives, including those which have yet to be identified.</p>	<p>Not recommended – this option is likely to have a negative impact on resident outcomes through service reductions. Minimal proactive investment in prevention and reducing demand will be possible, undermining any strategy to cope with increased demand in the future and reducing the ability of the Council to establish long-term financial sustainability. Relying on individual efficiency initiatives increases risk in the MTFP as these have not yet been identified. Continuing with individual initiatives perpetuates the challenges of duplication and un-joined up services and support functions. No benefit will be released to enable policy and investment choices.</p>

Impact Assessment – the wider community

Overall, the intention of the operating model is to create a Council that is Fit for the Future, meaning that it is financially sustainable, equipped to address rising demand and focusses resources on front-line outcomes. It should, therefore, ultimately have a positive impact on the population as a whole and particularly on those most in need of services. This is most clear when considered against the alternative of direct reductions in service levels. There is the potential for specific positive outcomes to one of more particular groups depending on how the model is implemented and on choices that are made on how any benefits are reinvested. However, such future policy choices will need to be subject to individual impact assessments in the usual way, including where relevant the SCIA process associated with Service and Resource Planning.

Of the seven layers of the Operating Model, three relate directly to customer-facing activity:

- Pre-front door
- Customer management
- Customer assessment

The characteristics of service users and customers across the Council's diverse services varies considerably, from universal services, used by the whole population to services targeted at extremely specific groups. The impact on specific individuals and identified groups of applying the model will only therefore be able to be assessed in the detail of the Construct and Implement Phase and the action plan below recognises the need for that future assessment – including through appropriate consultation, engagement, user-testing and co-production.

However, the three outward-facing layers, if implemented, will create some shared characteristics for services which mean that it useful at this stage to consider potential impact and ensure appropriate mitigations are in place within the proposals.

The three key characteristics of the front-office layers and their potential differential impacts are set out below:

- **Digital by design:** *Development and promotion of channel-shift opportunities across all service areas, with a particular focus on digital and self-service. This will be enabled by a simple digital customer portal, integrated systems and an assisted digital offer.*

As identified in the 2018 JSNA (see insight.oxfordshire.gov.uk) local data on internet and digital service use is limited. However, national data sets – including the Office of National Statistics Opinions and Lifestyle survey (ons.gov.uk) and Ofcom's Communications Market Reports and its Adult's Media Use and Attitudes Report (see ofcom.org.uk) – can be used as a working basis to make working-assumption about Oxfordshire's population to be tested through consultation, engagement and more detailed local analysis.

Together, the data sources listed make a number of conclusions relevant for consideration in expanding the Council's digital and self-service capacity:

- Nearly all adults aged 16-54 are now online
- The total proportion of non-users of the internet has remained unchanged at ~12% through 2014, 2015, 2016 and 2017 studies - suggesting a plateau of usership
- Older people and those in less affluent socio-economic groups are more likely to be non-users of the internet
- Adults are increasingly likely to use a smartphone to go online
- Half of all adults have completed a government process online and half have looked at government sites for public service information
- More than half (52%) of non-users of the internet say they do not go online because they do not see the need, one in five (22%) mention a reason relating to the internet being 'too complicated' and 15% mention a cost related reason. Older non-users are more likely than younger non-users to say they don't go online because they do not see the need, while young non-users are more likely to cite cost.
- A majority (63%) of non-users say nothing would prompt them to go online in the next 12 months, a figure that has decreased since 2016 from 75%. More than two in five (44%) of non-users have asked someone else to use the internet on their behalf in the past year.
- Smartphone ownership peaks at 95% for 16-24 year olds
- A significantly lower proportion of disabled people, when asked, stated that they had used the internet to find information about good and services (57% disabled compared with 80% not disabled)

The available data therefore suggests that age, deprivation and disability can be excluding factors and these are discussed below.

Rurality may be a potential excluding factor from digital access as some (although certainly not all) of the remaining areas of the County with less connectivity are in rural areas. The Better Broadband for Oxfordshire website (betterbroadbandoxfordsire.org.uk) estimates that 96% of homes and businesses in Oxfordshire will be able to access superfast broadband by the end of 2018. This places Oxfordshire in the upper quartile of counties in terms of superfast broadband access, but will leave approximately 8,500 premises without access and where there is no fully funded solution in place due to the very high cost of intervention required.

A lack of data on other protected groups does not necessarily indicate that there is no exclusion and so services will need to continue to monitor the impact of digital and self-service during implementation and in the future for other groups not specifically addressed here i.e.: gender reassignment; pregnancy and maternity; race; religion or belief; sex, sexual orientation; marriage and civil partnership.

The design of the Operating Model is deliberately *Digital by Design* and not *Digital by Default*. A design decision was made to adopt an approach of

building digital and automated access where appropriate which most people would choose to use as their first option, rather than forcing digital as the only route. Alongside digital access, an *Assisted Digital* approach will ensure that those unable to access digital or automated services or who might be at risk of experiencing disadvantage in service outcomes such an access route will be able to make the choice to access assisted digital channels, according to their needs. The business case states that assisted digital is:

- Designed to meet well-defined assisted digital user needs
- Helps users build the skills and confidence to use online channels independently [and in doing-so, build transferable skills]
- Is easy for users to find – at the times and places they need it
- Is trusted, free to use and easy to access.

It is envisaged that this would be provided face to face – including through libraries and receptions and in people's own homes, on the telephone and through webchat where an agent can assist with an enquiry on-line, in real-time.

- ***Enhanced Customer function:*** *An enhanced customer function with the right mix of resources and service specialisms to effectively signpost, filter, resolve queries at first contact or route to operational service areas. This supports a consistent Front Door across the whole council to assist residents, members and staff.*

It is not the case now that accessing the Council is always straight-forward; the Activity Analysis identifies multiple telephone numbers and access points and different ways of handling digital enquiries. Therefore, standardising and improving contact routes overall offers the opportunity to enhance the experience for all. Clearly this requires that the standardisation and consolidation of customer service functions and in particular assessment processes are successfully delivered. In the event of any given service's standards dropping through such a change, and given the specific user demographics of many specialist services, it is possible that one or more protected groups would be disproportionately affected. Alongside assessing the potential differential impact for specific services as the change is designed, it will therefore be critical to monitor implementation and service performance in the future including through the consideration of demographic indicators against performance indicators e.g. complaints (see note below on the recently revised Equalities Policy and Strategy 2018-2022).

- ***Enabling service areas and communities:*** *Links with the Pre-Front Door will help people to find solutions and create opportunities in their local communities. Operational service areas will be able to focus on more complex customers and service delivery, supported by streamlined processes and improved technology.*

This focus of the Operating Model seeks to ensure that the Council is enhancing the community's capacity to deliver innovative, local and empowering solutions.

While the Council is already extensively engaged with community and voluntary sector organisations and initiatives, integrating community involvement as a fundamental aspect of all service design is a new approach. It is the intention for the Council to act in the main as an enabler in this area of the Operating Model: to support the right conditions for strong communities, to empower others to take actions and to connect resources together to maximise impact. Prevention and the reduction of demand on traditional council services through more successful early community intervention is core to the purpose of this approach.

As such, detailed design of community based initiatives will need to consider the extent to which they have the potential to have a differential impact on protected groups considering that:

- Geographic communities and communities-of-interest with lower social cohesion, social capital and capacity for action may be at risk of disadvantage if these factors are not identified as new approaches are designed;
- Isolated groups living within strong communities may be at risk of disadvantage if these factors are not identified as new approaches are designed.

The remaining four layers of the Operating Model are predominantly concerned with back-office services:

- The provision cycle
- Enabling and support services
- Strategic Capability
- Business Intelligence

While in themselves changes proposed within these layers should not be experienced directly by the population, the successful implementation of these layers, and in particular Strategic Capability and Business Intelligence, will be part of the mechanism by which the Council delivers on its commitments within the recently agreed Equality Policy and Strategy (2018-2022) to:

- Improve the Council's understanding of its customers
- Improve the Council's understanding of users' views on services
- Improve access to the Council's web and digital services making sure that all residents are able to access the information they need as easily as possible
- Improve the quality of data on services users to improve responses and outcomes and to better understand needs

Improving in these areas will support the Council's commitment to equality, diversity, fairness and inclusion by supporting individual services to improve the quality of analysis within their own service planning and impact assessments.

The business case also concludes that the Council can generate additional benefits through improved procurement and the management of third party spend and commercialisation. Again, it is not possible to assess the impact of these proposals in aggregate as detail is not yet available of what might change. The implementation of any new contracting or contract management arrangements or the establishment of any commercial arrangement will need to be assessed for service impact in the normal course of service and policy review.

Impact Assessment – staff

The business case identifies that there is a potential loss of between 600 and 890 full time equivalent posts within the Council as a result of implementing the business case – before consideration is given to the potential reinvestment of some savings in service provision. (It also notes that other savings options not recommended, would also result in reduction in headcount, but in a less managed process.) As the report makes clear however, the high-level assessment of an overall reduction in headcount cannot be directly equated to specific job losses through redundancies and it is not therefore possible to examine the impact on particular groups at this stage. It is clear however that there is a likelihood of a significant number of potential redundancy situations. The report goes on to note that it is the Council's policy to minimise redundancy through retraining and redeployment and three factors will support the delivery of this policy in the current situation:

- Firstly, the programme is expected to be delivered over two-three years. With staff turnover of 650 per year, there is opportunity to limit the real impact by carefully managing HR planning over the programme period;
- Secondly, the Council has a good track record of applying its redundancy policy and has experience, working with staff and the unions, of limiting the impact of reorganisations on individuals
- Finally, at the upper end of the scale of potential savings, choices will be able to be made about how resources released are invested. It may be the case that the Council is in a position to choose to reinvest in some services, focussing resources on frontline impact. This would reduce the net number of posts lost as resources would effectively shift across the organisation. This would be a decision for elected councillors through the normal budgeting processes.

The Equality Policy and Strategy (2018-2022) also sets out objectives for promoting a culture of fairness and inclusion in employment demonstrating our commitment towards greater equality in our workforce. It draws on evidence within the most recent Equality in Employment Report (from 2017) which gives the Council a good understanding of the make-up of its staff group.

The relevant objectives in the Equality Policy and Strategy are to:

- Improve the balance of gender in the workforce, particularly in services where a group is under-represented;
- Increase the representation of Black, Asian and Minority Ethnic employees in the workforce;
- Increase the number of people under 25 employed in the workforce;
- Improve how employees with disabilities are supported so they can be fully involved in the workplace, access career development opportunities and be successful at work.

Implementation of the Operating Model will bring about new ways of working and change across the organisation. Therefore, it presents both an opportunity for accelerating change and challenges with respect to delivering these objectives. Programme implementation planning will need to take these objectives into account and examine detailed evidence and impact analysis of proposed change before they are agreed, through the usual processes.

The detail of identified potential impact on groups, other service providers and staff is set out below.

This assessment is initial and high-level, and mitigations should be regarded as indicative pending the full development of implementation strategies and plans. As noted in the Cabinet report, each phase-release plan will need to demonstrate that sufficient impact assessment has been undertaken before approval.

Impact on Individuals and Communities:

- Age

Risks	Mitigations
<p>Older people are the most likely age group not to have access to the internet and could be excluded by services that were digital or self-service only</p>	<p>The Operating Model is designed specifically to be digital by choice, rather than digital only. Assisted digital options are being designed in from the outset including supported access through physical locations (eg Libraries), supported access via telephone and on-line support where appropriate. Services will not be shifted to an automated or digital approach where this is not deemed appropriate for the specific service and individual impact assessments will be made. The usual community and formal support mechanisms for more vulnerable older people will remain in place. 'The pre-front door' element of the business case seeks to strengthen community support and the Council continues to support programmes such as the 'Digital Buddies' scheme to reduce digital exclusion.</p>
<p>Younger people are more likely to access online services through mobile devices. There is a risk that if investment in new devices and formats is not sustained, automated services will be less accessible for choosing mobile access.</p>	<p>Digital and automated services need to be designed for the devices our customers are most likely to use</p>

- **Disability**

Risks	Mitigations
<p>People with disabilities are less likely than the wider population to access services and information through digital channels and could be excluded by services that were digital or self-service only.</p>	<p>The Operating Model is designed specifically to be digital by choice, rather than digital only. Assisted digital options are being designed in from the outset including supported access through physical locations (eg Libraries), supported access via telephone and on-line support where appropriate. Services will not be shifted to an automated or digital approach where this is not deemed appropriate for the specific service and individual impact assessments will be made. The usual community and formal support mechanisms for vulnerable disabled people will remain in place. 'The pre-front door' element of the business case seeks to strengthen community support and the Council continues to support programmes such as the 'Digital Buddies' scheme to reduce digital exclusion.</p>

- **Deprivation**

Risks	Mitigations
<p>People experiencing deprivation are less likely than the wider population to have access to the internet and could be excluded by services that were digital or self-service only.</p>	<p>The Operating Model is designed specifically to be digital by choice, rather than digital only. Assisted digital options are being designed in from the outset including supported access through physical locations (eg Libraries), supported access via telephone and on-line support where appropriate. Public wifi and computers are available for free in all libraries mitigating risks associated with cost of access. Services will not be shifted to an automated or digital approach where this is not deemed appropriate for the specific service and individual impact assessments will be made. The usual community and formal support mechanisms for vulnerable disabled people will remain in place. 'The pre-front door' element of the business</p>

	case seeks to strengthen community support and the Council continues to support programmes such as the 'Digital Buddies' scheme to reduce digital exclusion.
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- **Rurality**

Risks	Mitigations
Lack of superfast connectivity for a number of rural communities could exclude customers in these communities from access digital of self-service channels.	The Operating Model is designed specifically to be digital by choice, rather than digital only. Other options will remain (as set out above). The Council continues to support a successful and effective broadband programme to extend access as far as possible within available funding limits.

Impact on Staff:

Risks	Mitigations
Impact of wide-spread change is likely to lead to a significant number of redundancy situations	To develop a comprehensive implementation strategy that meets the council's policy of minimising the redundancy through retraining and redeployment. Take advantage of the two-three year timescale of the programme to carefully manage employment strategy to minimise net redundancies and ensure existing staff are in a position to undertake any new opportunities that may emerge from potential decisions to reinvest in services. The Operating Model incorporates substantial investment for training, communications and engagement.
That the scale of change in the organisation, including a period of restricted recruitment, could impact on the Council's ability to deliver the objectives with the Equalities Policy and Strategy (2018-2022). These include the development of greater diversity in the	The objectives of the Equalities Policy and Strategy need to be incorporated into any Operating Model implementation strategy and monitored as performance indicators of the overall programme.

workforce, including the recruitment of more young people and members of BAME communities.	
That any specific change could impact disproportionately on one or more protected groups.	To undertake impact analysis of each reorganisation process in the normal way.
That the scale of change could negatively impact on staff levels of stress, or anxiety, or overall wellbeing.	A full staff engagement and change plan will need to be delivered as part of implementation planning. The Operating Model proposals includes significant investment in change preparedness. The Council already invests in a staff welfare programme including access to Occupational Health advisors, a helpline and specific courses on resilience and experiencing change.

Impact on other Council services:

Not applicable - the Operating Model proposals are inherently cross-council and designed to impact across services.

Impact on providers:

The specific impact on providers will need to be assessed within the Construct and Implement phase of the programme, as the details of design are understood.

Social Value

If the Public Services (Social Value) Act 2012 applies to this proposal, please summarise here how you have considered how the contract might improve the economic, social, and environmental well-being of the relevant area.

How might the proposal improve the economic well-being of the relevant area?

n/a

How might the proposal improve the environmental well-being of the relevant area?

n/a

Action plan:

Action	By When	Person responsible
Implementation strategies and plans will need to set out how impact on the community will be assessed and mitigated. This will only be possible as the detail of plans is developed.	To be confirmed in the programme implementation strategies and plans	Fit for the Future Board
Implementation strategies and plans will need to set out how impact on staff will be assessed and mitigated. This will only be possible as the detail of plans is developed.	To be confirmed in the programme implementation strategies and plans	Fit for the Future Board
Detailed impact assessments will need to be undertaken alongside the development of each new service offering – in the usual way – and this will need to examine the available evidence on the make-up of customers for specific services and assess any potential disproportionate impact on protected groups and identify corresponding mitigations.	To be confirmed in the programme implementation strategies and plans	Fit for the Future Board

Monitoring and review:

Try to be as specific as possible about when the assessment will be reviewed and updated, linking to key dates (for example when consultation outcomes will be available, before a Cabinet decision, at a key milestone in implementation)

The SCIA will need to be reviewed and updated as implementation strategies and plans are brought forward for agreement.

Person responsible for assessment: Robin Rogers

Version	Date	Notes (e.g. Initial draft, amended following consultation)
0.1	August 2018	

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