

Question 2. Where it is proposed that services will be delivered on a different geographic footprint to currently, or through some form of joint arrangements is this likely to improve those services? Such services may for example be children’s services, waste collection and disposal, adult health and social care, planning, and transport.

Yes No

Stronger Somerset’s proposals will increase complexity

The structural reforms proposed by Stronger Somerset do not streamline or improve local government for Somerset. They effectively offer to remove the existing five local authorities and replace them with five new organisational structures:

- Two unitary authorities.
- A county-level Combined Authority covering only those two unitary areas.
- A new model for children’s services straddling both unitary areas (termed an Alternative Delivery Model although subsequent Stronger Somerset briefings have used the terms community interest company and / or trust).
- A shared service organisation to attempt to coordinate administration between each unitary authority including “back office” enabling services.

Our view is that this structure will inevitably create increased bureaucracy, greater complexity, delay, potential for conflict between partners and reduced democratic transparency. Somerset residents, service users and customers could not be blamed for being confused about which organisation to contact with their queries.

Five conflicting organisations with different priorities will also undermine the strategic opportunity that unitary authorities should offer. It will create a confused “multiple” voice for Somerset locally, regionally, nationally and internationally.

Children’s Services proposals risk their improvement journey

Lack of detail on the proposed Alternative Delivery Model

Stronger Somerset proposes restructuring Children’s Services as a separate company, an “Alternative Delivery Model”. Our concern, shared by Trevor Doughty in his independent analysis (appendix D), is that the proposal lacks detail and therefore does not represent a reliable, evidenced proposal. In particular:

- Implicit, though not stated, by Stronger Somerset, is that each of the envisaged new authorities would be too small to warrant a standalone children’s services function.
- A “distinct Eastern/Western focus” is mentioned as an aim but with no further detail beyond envisaging “area-based delivery and commissioning functions”.

How effectively economic, social and environmental issues are addressed depends upon the approach of whoever is elected to those structures and who is employed to work for them. A new structure does not in itself address problems. This shows a fundamental lack of understanding by Stronger Somerset of how to deliver improved outcomes. Our view is that the claims made by Stronger Somerset regarding expected outcomes of a new structure cannot be relied upon.

- Stronger Somerset anticipates a “fresh start” with their new delivery model which will create the emphasis to solve long-term problems experienced by children and young people. Moving the service to an Alternative Delivery Model, would mean disruption and uncertainty for the ongoing and positive improvement journey which has been under way for several years.
- No detail of why a fresh start is desirable is provided other than references to approaches in other areas such as the Hertfordshire Family Safeguarding Model however the County Council has already worked with Hertfordshire County Council to develop a new model for family safeguarding. The business case was also based on the Hertfordshire model and the new service is now operational. Stronger Somerset’s proposals offer nothing new or beneficial in terms of improving family safeguarding: most certainly not a “fresh start.”

Stronger Somerset’s proposals also lack detail on how the Alternative Delivery Model and “fresh start” would continue the improvement journey in Children’s Services and does not address the fundamentals that need to be in place to enable high performing children’s services:

- All the outstanding-rated children’s services (14 in all) in the country, with the exception of Kingston, are traditional in-house council models. Alternative Delivery Models - usually trusts - have generally been imposed on Council’s with inadequate ratings and who are failing to improve. They do not in themselves guarantee improvement. No evidence is provided by Stronger Somerset on why the Alternative Delivery Model will buck that trend, or even be necessary considering the continuing improvement journey of Somerset’s Children’s Services.
- An Alternative Delivery Model responsible to two unitary authorities presents obvious practical and financial problems including managing conflicting political and strategic priorities, contractual issues, and differing needs of children and young people that also change over time.
- Specific problems would include budgetary alignment and prioritising by two councils, multiple reporting requirements for the Chair, non-executives and senior managers, and unavoidable bureaucracy and additional cost.

The new Alternative Delivery Model would have a single Director of Children's Services (DCS) but because there is no detail on proposed governance or what kind of company it would be, the reporting lines of the DCS are not clear. We must therefore assume that each unitary authority would have a Chief Executive and a lead Member for children as required by statute and the company would also need a chair and a board. In our view, this does not improve delivery of services for children and young people. Such an arrangement would be confusing for children and young people, their families, parents, and carers. It would create significant complexity in partnership working and decision-making, would be more costly than a single service on a county-wide unitary authority footprint and lack transparency.

In summary, it is not possible to understand how an Alternative Delivery Model will deliver improved employment opportunities for young people, reduce the attainment gap between disadvantaged children and the majority, strengthen governance, improve relationships with schools, deliver better services for children with special education needs, or enhance safeguarding, public health, and mental health and wellbeing of children and young people. By jeopardising the current improvement journey, Stronger Somerset's proposals would involve taking major risks for Somerset's children and young people.

Costs of setting up a Children's Services Alternative Delivery Model

In 2018/19, over half of local authority children's services departments overspent. This was primarily for three reasons: increased demand, the cost of placements and the cost of agency staff. All local authorities seek to control their costs by helping children and families early to prevent the more acute costs associated with child protection plans and high numbers of children in care. All authorities attempt to recruit permanent social workers and managers, which is challenging in the face of increasing demand, more expensive placements in a seller's market, and a shortage of qualified social workers and managers.

The detail above is relevant to Stronger Somerset's proposals for the following reasons:

- The proposed Alternative Delivery Model will not in itself achieve financial control. Creating the conditions for a successful service does.
- As a model, the creation of an Alternative Delivery Model will **add** to costs because of the presumed necessity to have a board with a chair, probably a separate finance director and other associated support costs. Such costs are not factored into Stronger Somerset's financial analysis.

The lack of detail in Stronger Somerset's proposal for an Alternative Delivery Model makes it difficult to assess the likely transition and operational costs, however we believe them to be underestimated by Stronger Somerset.

- The analysis in PWC's independent report suggests that a two unitary scenario with a children's trust model would face a recurring cost of £3.5m per annum to run the trust. In addition, the analysis outlines that the establishment of a trust would cost £3m to set up.
- The independent expert analysis carried out by Trevor Doughty (appendix D) to support this consultation response led us to be convinced that Stronger Somerset's proposals are not necessary and would worsen, not improve, services for vulnerable children and young people.

Adult Health and Social Care

Services are improving well – a “fresh start” is not required

We strongly dispute the assertion by Stronger Somerset that Adult Social Care in Somerset is failing and a “fresh start” is required. Somerset County Council and partners have worked hard for many years to deliver the ambitions agreed with across the health and social care system, and the strong, nationally recognised progress is referenced in Professor Bolton's independent analysis (appendix B). This excellent progress and strong impact would be further consolidated through a single unitary authority and Integrated Care System (ICS), which would have coterminous boundaries. This ambition is being pursued because it is financially sound, will work effectively with the NHS, and collaborative arrangements are already well advanced and proving to be effective. For example, in developing the new “Intermediate Care” service in Somerset to speed up discharge of patients from hospital. Therefore, there are significant risks to the transformation that has taken place, and the health and wellbeing of Somerset's population, if Adult Social Care was to be subject to the changes proposed by Stronger Somerset. A restructure that breaks services into east and west silos and removes the key benefit of coterminous boundaries with the Clinical Commissioning Group will have a significant negative impact on services for vulnerable people.

Our overall views of Stronger Somerset's proposals regarding Adult Social Care are that:

- They demonstrate a lack of understanding of how Adult Social Care and health in Somerset works, and of the positive outcomes being delivered for residents.

- The savings suggested by Stronger Somerset are unrealistic within the timescales proposed and based on misunderstanding and a lack of knowledge of the current system.

There is an underestimation of the potential costs of the new structure with locality-based teams which would be likely to offset any savings made in the early years of a disaggregated (broken up) Adult Social Care services. As shown in table 1 in our response to question 1 of the consultation, PwC assesses the cost of disaggregation to be £12m per year.

- The Stronger Somerset assessment of services to adults is a wholly inaccurate picture of the current performance of Somerset’s services for adults. Adult services within the County Council are leading collaborative work, working with public health, children’s services, the voluntary, community and social enterprise (VCSE) sector, providers and place-based services to ensure services are people-centric not service-centric. Somerset County Council are also collaborating strongly with NHS and can provide examples of projects that successfully link the County Council, the NHS Trusts, Clinical Commissioning Group, social care providers and the voluntary and community sector.
- Local models are a key focus and vehicle for driving Adult Social Care outcomes, including village and community agents, micro providers, and small place-based care provisions in towns and villages.
- The focus on improvement that has taken place over the last five years has delivered a cost-effective, person-centred approach to social care that offers improved outcomes for its citizens through personalisation, promoting independence, and freedom of choice. These facts are either not understood or ignored by Stronger Somerset in favour of incorrect assumptions about the state of these services (for example and to quote Stronger Somerset: “lack of collaboration, poor relationships, failing services”, which is demonstrably not the case).
- Additional costs can be expected that are not recognised in Stronger Somerset’s proposal. This would include but not be limited to:
 - Two management teams including a Director of Adult Social Services for each authority.
 - Significant contractual confusion between two unitaries and the proposed shared service organisation.
 - Conflicting budget priorities and policies between the two unitaries.

Providers are clear they wish to avoid duplicating bureaucracy and are happy that the existing arrangements work and could transition seamlessly into a single unitary structure. This is not the case with Stronger Somerset’s proposals which would create market instability in both the care provider sector and for adult social care staff - ultimately driving costs up and service quality down.

Stronger Somerset proposals for Adult Social Care and health are not new

Stronger Somerset's proposals are a significant threat to the progress that has been made in recent years and would lead to higher costs and poorer outcomes for citizens.

The proposal from Stronger Somerset for Adult Social Care is that it can offer "...interventions that give people greater control over the care they receive, with more care and support being offered in or close to people's homes, rather than in hospital or care home settings." This is in fact the programme on which Somerset County Council and its partners have been delivering successfully for several years.

Somerset County Council embarked on a major transformation programme for Adult Social Care and Health, starting in 2017. Its purpose was to improve outcomes across the system with our partners in the NHS and care provider sector, whilst also addressing the issue of increasing costs. The aim was not to make cuts in services or reduce their offer to local people, but to deliver a range of services that enabled them to be more cost effective and efficient in the way in which social care was delivered. This was achieved through five main change programmes:

- Developing a local contact centre, which signposts an average of 63% of adult social care calls to community-based options, thereby avoiding unnecessary demand and resolving customer queries at the first contact. Average waiting time for safeguarding contacts is under 20 seconds.
- Reducing the demands for residential care.
- A community-based approach including social enterprise.
- An improved relationship with those who provide services in Somerset.
- A new approach to discharging patients from hospital and a joint set of Intermediate Care Services for the County.

The result of these programmes is that Somerset County Council Adult Social Care has been able to balance its budget whilst improving services and outcomes for local people, without making direct cuts to local services. This is an impressive outcome for any council and is an important point to make because the Stronger Somerset proposals are already being delivered across the county by the existing coterminous health and care system, which is well set up to meet the challenges of the next decade. Fragmenting the current, strong performing, county-wide system will undo the good work already done, without a plan in place to deliver promised improvements.

Financial weakness of Stronger Somerset Adult Health and Social Care proposals

The Stronger Somerset proposals use financial data as a key argument for reform, however the figures used are misleading and show a lack of understanding of the way in which social care has been required to operate in recent years.

Stronger Somerset's proposals claim that "[adult social care] was already a service under substantial pressure with cuts agreed in 2018 to help address the County's financial position, adversely impacting vulnerable people, including £1.75m of cuts in services for disabled people and £2.75m in services for adults in receipt of adult social care". This is incorrect. Savings were delivered through a combination of the factors described elsewhere in our consultation response and best summarised as: working to promote the independence of the people of Somerset through new strengths-based approaches to social care involving collaboration and a focus on prevention.

Performance and improvement of Adult Health and Social Care is already strong

Stronger Somerset's proposals refer to the measures that have been developed to assess social care called "the Adult Social Care Outcomes Framework" (ASCOF). Stronger Somerset's proposals use these measures selectively and subjectively, despite being widely seen by the sector as not being true measures of the outcomes that adult social care can achieve: the Department for Health and Social Care is currently undertaking a major review of these measures.

It is important to note that some of the measures in which the report suggests that Somerset's performance is low are those that are most contentious in the ASCOF survey:

- Partly because of the way in which they are open to interpretation.
- Partly because they result from a survey which has traditionally had a low response.
- Partly because only a very limited number of adult social care service users are asked for their views as a percentage of those who approach services for help. For example, "Use of Resources" measures developed by the Local Government Association offer a much more effective means of analysing performance, which would have shown a much more realistic – and positive – picture of Somerset County Council's Adult Social Care service.

Data clearly demonstrates that Somerset is making good progress on social care improvement and it would be a high-risk strategy to break up the teams that have delivered this progress, and potentially create the exact problem that Stronger Somerset incorrectly suggests exists now.

Stronger Somerset proposals for social care suggest that currently there is: "...potential but less incentive to redesign services, including high-cost areas such as social care services, with focus limited to 'back office'. Integration savings provide initial financial breathing space, but reinvestment [...] to address existing services not their reform. Invest to save not expected to be undertaken, based on previous track

record...” We strongly refute these statements as they bear no relation to Adult Social Care in Somerset. In reality:

- There has been a full redesign of services over the last few years as highlighted above. There is no suggestion that there are savings to be achieved from integration and there is no evidence that this integration does deliver savings. In fact, there has been a reinvestment in the way in which adult social care is run even during a time when Government has expected savings to be made. Therefore, the critique offered by the Stronger Somerset proposals seems off the mark and shows a distinct lack of understanding of what is happening and what is required. It was this concern that worried our independent expert Professor John Bolton (appendix B) more than anything else about the Stronger Somerset bid.
- The adult social care and health system in Somerset has a very strong preventative strategy. Breaking that service and the strong, collaborative leadership of it into two would damage county-wide interventions such as the award-winning contact centre, intermediate care and the overall improvement journey. Splitting up a system that is working well would inevitably mean less coherent support to individuals and families experiencing a crisis, and reduction in opportunities to focus on prevention in preference to intervention.

The value of digital innovation in adult health and social care is misunderstood

One of the features of Stronger Somerset’s proposals for adult social care is the suggestion that digital technology will allow large savings to be made. In our view, savings proposed through digital technology alone cannot be considered deliverable and should be discounted from the Stronger Somerset proposals for the following reasons:

- Savings themselves are relatively small from the use of technology itself, they can be much larger if they are delivered in the right context. Evidence suggests that savings are only possible if technology is used to support people to regain power, control, and independence. We were surprised by the assertion in the Stronger Somerset proposals that digital technology delivers large savings as this is not supported by national evidence.
- However, we believe that there is no adult social care service in the country that has made its savings solely using technology. The Local Government Association Efficiency Programme Report 2015 on how councils had saved money between 2010 and 2016 found that there were large savings made by reducing overheads and reducing admissions to residential care.

- Nevertheless, Somerset County Council already has an improvement programme under way making use of digital innovation to improve outcomes for residents through technology-enabled care and assistive technology.

Place-based services

In his independent analysis of Stronger Somerset's proposals for place-based services (appendix C), Neil Gibson identified that Stronger Somerset's business case describes a wide range of objectives for place-based services, however there is no clear or evidenced rationale in the proposal for their inclusion, or which services would be effected. There is no baseline data underpinning proposals and no tangible indications of what improvement could be achieved by reforms proposed. There is no clear proposition for place services articulated in the proposal or that the approach will deliver the proposed financial and community benefits.

Mr Gibson identified several key existing county-wide place services and partnerships that have not been referred to in the proposal, with no explanation of where they would fit in the proposed approach. For example:

- Transport in its broadest sense – client transport and home to school transport, transport policy/local transport planning, innovation in sustainable transport and mobility.
- The future of the Somerset Growth Board.
- Highways asset management and maintenance and future of the existing County Highways Contract that runs to 2024.
- Strategic Flood Management responsibility.
- Emergency/resilience planning which works best where there are clear decision-making routes and strategic leadership
- Economic development and regeneration. It is not clear where these responsibilities would lie, how to integrate the five existing teams, or how the benefits of working closely with planning as an enabler to change would be delivered.
- Delivering the strategic aims of the county-wide Regeneration Strategy.
- There is very little detail regarding combined authority and devolution to town/parish/city councils.
- Other externally commissioned county-wide place services. It is not clear how these (and other operational and commissioning activity) would be delivered under a shared service organisation which prioritises contracts over collaboration.

There is also no suggestion that the current District Councils already adopt the approach they are proposing – individually or collectively – or have the track record,

expertise or experience to deliver this approach when scaled up across all Somerset's local authority services.

Unnecessarily complex proposals for place-based services

The Stronger Somerset proposals are light on service delivery detail, evidence-base and expected impact. In our opinion this is serious omission as the impact and seamless performance of reconfigured place services will be instrumental in achieving any ambitions for local government reorganisation in Somerset. For example:

- There are no significant references to how existing place services are currently delivered, what will change and how they will be delivered from vesting day should Stronger Somerset be implemented. This clarity and reassurance are not provided in the proposal.
- To achieve Stronger Somerset's complex ambitions, which we believe we have shown to be muddled and unevidenced, the broad suite of Place Services operating across the proposed system would need to be clear.

A spectrum of "agreements" with City, Town & Parish Councils in areas such as car parks, libraries, digital infrastructure, sustainable growth initiatives, devolution of assets, community development suggest a heavily contractualised and complex approach where local authority, stakeholder and public energies will have to focus on navigating these agreements rather than collaborating on solutions to local issues.

The proposed three-tier approach (cross-county level, unitary level, town and parish level) will increase the complexity of governance and costs, that already exist in the current model of local government in Somerset. It is not clear in the proposal where the guiding mind is for this three-tier system for place services and delivery, whether all governance costs have been included within the proposal's financials, or where clear accountabilities will sit.

The risks to place-based services

Stronger Somerset makes sweeping assumptions with a significant lack of detail or evidence underpinning them, and we are concerned by their unsophisticated proposals when there are complex issues to work through, such as:

- How to disaggregate large county-wide services.
- How to apportion disaggregated budgets.
- How to deliver promises should either a Combined Authority or devolution deal not be forthcoming.

As a consequence, we believe the Stronger Somerset ambition is exposed to significant unmanaged risks to delivery and benefits realisation.

The proposal has undertaken a risk assessment of its programme and the seven highest rated risks presented in the report, though two risks (County-led programmes are not aligned with Stronger Somerset objectives) are the same. This is a worrying error considering the importance of managing risk in a programme of this size.

There are other significant risks that have not been considered high enough impact to be addressed, or alternatively may not even have been recognised:

- Impact on county-wide place service contracts such as highways maintenance and improvement, parking enforcement, street-lighting, library services and enterprise centres have not been addressed.
- How will the Stronger Somerset model function if City, Town and Parish Councils do not wish to fully participate in the various local devolution opportunities?
- The broad-based Combined Authority proposal lacks support from neighbours meaning the two unitaries can only create a small version on the current County Council boundary. This is not consistent with the purpose or expected geographies of Combined Authorities.
- If no devolution deal or funding package is agreed with Government, there is no obvious "Plan B" for driving the proposed economic, social and environmental ambitions through existing resources.
- The system-led approach to place service reform across both unitaries does not deliver the scale of on-going base revenue savings proposed.
- No disaggregation costs for revenue or capital are included for splitting up county services and their associated contracts.

Lack of strategic opportunities in Stronger Somerset proposals

It is our view that the two unitary, three-tier, five organisation model proposed by Stronger Somerset will result in loss of strategic opportunities that unitary reorganisation would expect to deliver.

- The benefits of strategic growth cannot be maximised when delivered at a smaller scale: working at a single unitary authority level would, for example, potentially attract more inward investment as well as the ability to communicate as a single or coherent voice for the place. The Stronger Somerset proposals do not offer either a more strategic or a single strong voice.
- Another consideration is the large rural footprint in Somerset. Disaggregation would limit the potential for clear place leadership because the single voice of the place would be lost, or create disparities in the potential for investment between the new unitary areas.

- Place identity and a strong brand are key levers to encourage and attract investment. Somerset as a place has a strong identity nationally.
- Eastern and Western Somerset as described by Stronger Somerset do not exist culturally or historically. Dividing Somerset in the way proposed would create
- tensions between communities and in decision-making, especially if one area wishes to invest more in a service, or reduce service levels.
- The model proposed by Stronger Somerset lacks essential simplicity and would require disaggregation of good-performing services, have detrimental impacts such as lack of strategic reach or a single-voice, and would create additional complexity for the public, stakeholders, partners and workforce.
- The need for new homes is a major pressure on all local authorities in terms of links between housing need and demand, planning, and associated infrastructure development, financing and delivery. Delivering a strategic approach in this field allows coordination across the area. Doing so between multiple authorities is unavoidably more complicated than it under a single unitary. Also unavoidable is that this complexity would add risk, cost and time to housing delivery and fail to deliver in a strategic, more effective way.
- Stronger Somerset will solidify economic and social disparities between east and west whilst limiting the economies of scale that would help address those issues (the west of the County has greater comparative deprivation and lower levels of income). Eastern and western unitaries will also be rivals for economic growth and inward and infrastructure investment. This would impact on the Government's levelling-up ambitions and create tensions between the two unitaries and amongst communities.

Alternatively, a single unitary provides a single voice with government and others, and a single point of contact for residents and businesses. It also offers financial and performance benefits by maximising scale. Stronger Somerset, in our view, is not a platform to maximise strategic thinking to solve ingrained problems such as housing supply or productivity. In fact, it is more likely to make investment more difficult, increase overall costs and limit partners' ability to cooperate. Our view is that a single unitary solution offers the benefits of maximising scale and that there are risks and challenges associated with disaggregation and the establishment of the Stronger Somerset model.