



TRIS Discovery User research part 2

28 June 2018. Leah Lockhart and Dug Falby

Introduction

TRIS User research. Findings from part 2 depth interviews with operators from whiskey; metals; landfill and fish-farming sectors.

Currently the team has conducted interviews with a small number of operators (5 interviews have been completed) and the research is happening in steps. Our first access was with front-line regulatory staff and since then we have been granted access to staff at site operators.

Broadly, the research is happening in three parts. We are currently organising operator interviews and we hope to extend our research in part three. The plan is to learn from service users wider afield:

Part 1	Part 2 (today)	Part 3 (tomorrow)
7 x (S)EPOS	2 x Site managers	Further operators
5 x Unit managers	1 x Owner-operator	Legal / policy owners
5 x SCC operators	1 x Env manager	Universities
1 x Spec 2	1 x Operator rep	Other research orgs
3 x Scientists		Local government reps
1 x Sampling officer		PF/Crown office

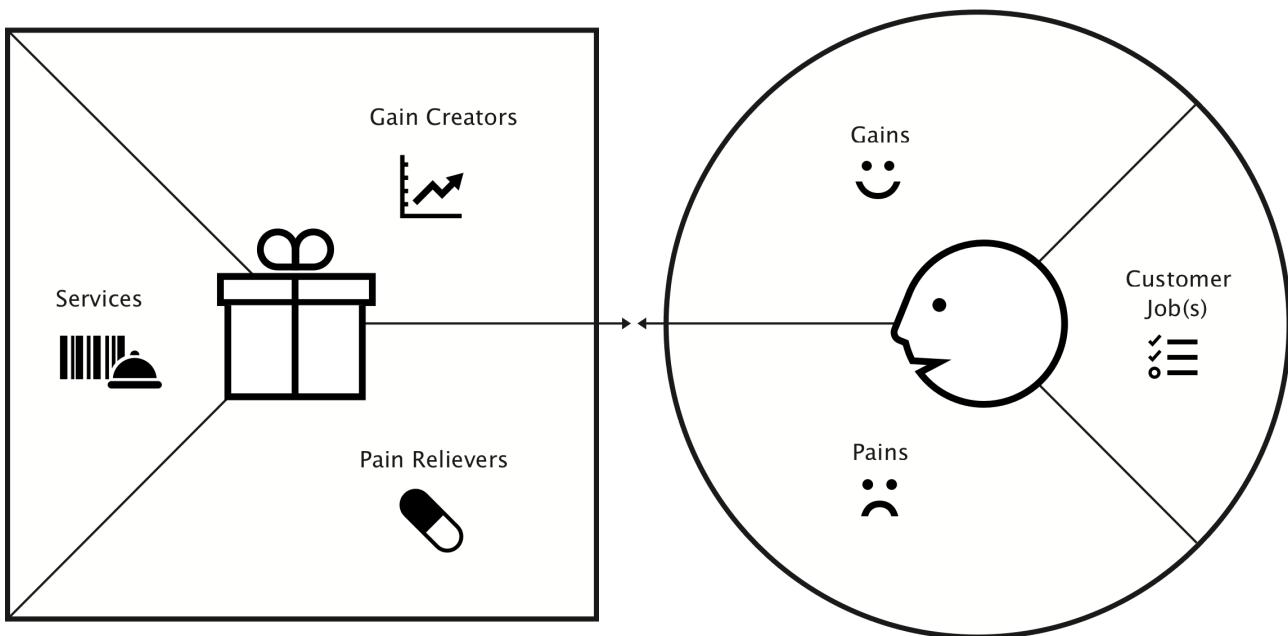
This phase of work continues and is also being aligned with parallel work interviewing fish-farm operators being conducted by the permitting agile team (Jo and John).

Why do user research?

There are many benefits to conducting direct, one-to-one user research with our “customers”.

We can learn about the pressures impacting those we expect to comply with our license conditions, we can understand the sorts of situations they might find themselves in and what motivations might drive them.

In future phases, this information might inform the design of our TRIS systems. As part of that design, we would expect to align the services and features of TRIS systems with the needs of the service users.



It can be useful to plot this alignment in a value proposition canvas (see above).

The idea is that user research identifies what jobs the users are trying to get done and what are the particularly painful parts of the process that we should try and address.

If all goes well, the user research should generate user insights that point to opportunities.

Simply put, an opportunity is a potential service element that will meet an unmet user need.

What did we hear in the interviews?

We have reviewed the user interviews and drawn out key findings. They are listed here in terms of what the participant said, and why it might be important.

WHAT DID WE HEAR?	WHY IS IT IMPORTANT?
<p>“I support a number of very different production managers so I need to disassemble the permit and rebuild it to brief the managers about SEPA conditions”</p> <p>“Different people need different things to get their job done”</p>	<p>Explore further: Every participant has explained that in one form or another, they rewrite our permits. Some have suggested format changes (a consent matrix on the first page of the license) and all detail the fact that important compliance details such as limits or conditions are “sprinkled” through the text of the license.</p> <p>Based on this it would appear that the way we communicate conditions is broken (“too vague”) and we should examine possible improvements. These improvements should include:</p> <ul style="list-style-type: none"> • Challenges to legal teams and legal language • Possibility of having “hard” and “soft” legal wording in the same permit • Design and layout of permits to highlight conditions • Filtering and organising conditions digitally (as per online storage in an operator portal)
<p>“SEPA speaks freely on the phone but won’t put it in writing”</p> <p>“When I suggested minuting our meeting, the SEPA officer postponed the meeting”</p>	<p>Explore further: This exposes a potential challenge with future services. Specifically, concerns around whether minutes are appropriate or planning communications around FOI requests could have a negative effect on the success of a case-management system as SEPA personnel might be reluctant to add tracking data and content interpreted as sensitive to the tool.</p>

<p>“We don’t understand what’s bugging SEPA”</p> <p>“Some of the conditions are really not important to my priorities”</p> <p>“Based on painful past experience, I can tell you for a fact that when SEPA inspectors come calling I can be looking at a massive loss of time and an expensive loss of product. It has now got to the point where I maintain a war-chest in my savings account to cover the cost of losses incurred as a result of SEPA involvement...”</p>	<p>Explore further: This is one of several comments that point to the asymmetrical nature of the relationship between operators and SEPA. In this case the operator is pointing to the lack of industry expertise from both</p> <ul style="list-style-type: none"> • The officer (EPO) • The legal text itself <p>We should explore further what this means. It is not directly TRIS-related but TRIS success does depend on the effectiveness of our people strategy (org structure; areas vs workstreams; staff training and onboarding) AND the output of our legal department (permit text as it promotes or impedes compliance and enforcement)</p>
<p>“How come I have to send data super quick, but SEPA can take as much time as it wants to respond?”</p> <p>“I get no confirmation of receipt from SEPA so I send everything recorded delivery. This happens a lot”</p> <p>“25 days to get a letter? Really? How come we don’t get to have a big time lag?!?”</p>	<p>Explore further:</p> <p>Points to:</p> <ul style="list-style-type: none"> • Asymmetric relationships • Org culture • Hard to be seen to be fair • Impact on future relationship building • Unfair risk allocation
<p>“SEPA doesn’t speak the same language as people on the outside”</p> <p>“...we keep getting caught up in words...”</p>	<p>Points to:</p> <ul style="list-style-type: none"> • Asymmetric relationships • Language issues <p>Also: 3 of the 5 said licenses and conditions are too vague and generally communicated badly which causes frustration.</p>
<p>“Every time I get a variation approved, our license file gets bigger. We have some licenses that look like War and Peace!”</p>	<p>Explore further: Solution / possible gain generator would be to issue a consolidation automatically for every variation approval. This idea is likely to be challenged by legal but should be tested for benefit vs cost/risk as it is a clear best-practise customer experience improvement (it’s hygiene)</p>
<p>“We get millions of reports on staggered dates; could SEPA not simply group them up and send out as one?!?”</p>	<p>Explore further: Could we do this? Again, this feels like a clear gain generator for the service user</p>

<p>“Sometimes the guidance is longer than the statute!”</p> <p>“...SEPA’s forms and guidance are different depending on the type of authorisation I apply for. It makes it harder to complete my application...”</p>	<p>Explore further:</p> <ul style="list-style-type: none"> • Might the IAF fix this? • Should we re-visit our approach to creating content (website and guidance)?
<p>“Electronic permits! Please!!!”</p> <p>“My car insurance documents are legal documents and they’re available online so why not my SEPA documents?!?”</p>	<p>Explore further:</p> <ul style="list-style-type: none"> • Provide online customer portal for documents and assets • Portal might drive collaboration and could support advanced sharing and communication. • O365 Sharepoint+Dynamics could potentially provide an out-of-the-box personalised and unique-to-customer collaboration option in this context
<p>“I need to understand each site I manage as an individual. In my mind, the site is almost like a living creature”</p> <p>“We’re working in nature”</p> <p>“I love my job”</p> <p>(importance of mastery, respect and variety which promotes a feeling of autonomy)</p>	<p>Explore further:</p> <ul style="list-style-type: none"> • How might we build on the respect for the Environment Manager’s skills and experiences • This quote points to the importance of mastery and autonomy in building employee satisfaction and service adoption. We should learn more about this and build this respect into our regulatory systems.
<p>“The chief issue is SEPA’s lack of consistency. There is always a lot of uncertainty”</p> <p>“Why doesn’t SEPA make officers be part of a ‘panel’. This way, they wouldn’t have to always go away and check stuff before being able to give us a binding answer”</p> <p>(importance of single point of contact)</p>	<p>Explore further:</p> <ul style="list-style-type: none"> • We are picking up two issues here. The first issue is that officers don’t always have the answers, and that in relationships with us environment managers can get conflicting information from SEPA. In many cases this is caused by a handover between different officers visiting, but it could also be a given officer getting incorrect data or the data changing over time • The second issue is that most of the operators we have spoken to expressed a wish for a single point of contact. Both from a communications point of view and a decision-making point of view

<p>“There is too much latitude in interpretation – this causes masses of confusion”</p> <p>“The interpretation of what is an event is impractical”</p> <p>(this comment relates to condition wordings but is also relevant to events notifications. IE what is an event? Is a litre of oil spilt a matter for a bucket of sawdust or do I need to report it to SEPA?)</p>	<p>Explore further:</p> <ul style="list-style-type: none"> • Test the legal position. Can we workshop permit language with live operators and design the legal wording like a prototype? • Explore two-tier condition wording (“hard” and “soft” legal wording on the same license?)
<p>“There is absolutely loads of great information on the website and I can’t find any of it when I need it!”</p>	<p>Explore further:</p> <ul style="list-style-type: none"> • Content updates (information architecture) • search opportunities?
<p>“Our sites are HUGE so I maintain extensive tracking documents. I use these to support creating both internal and SEPA reports”</p>	<p>Opportunity:</p> <p>What should we do with operators like Sally who are plainly ahead of us.</p> <ul style="list-style-type: none"> • Host events, jams, clinics? • Co-produce tools? • Bring her tools into SEPA? • Piggy-back on her reputation to influence other operators?
<p>“...we’ve found that there are quite a lot of different documents to manage during a planning application...”</p>	<p>Explore further:</p> <ul style="list-style-type: none"> • Collaboration tools (O365/ Sharepoint etc.) • Operator portal for sharing
<p>“When I needed information before applying for my license, I spoke to the sector lead. I knew her by name so asked for her directly”</p>	<p>Explore further:</p> <p>We should attempt to understand better the way SEPA and operator teams communicate and attempt to collaborate in a pre-application scenario</p>

<p>“...you know, other regulators in my sector do applications online. Why not SEPA?”</p> <p>...Participant describes a regulator website that allows him to:</p> <ul style="list-style-type: none"> ● Find further information ● Apply online ● Monitor compliance ● Process returns and receive feedback ● Pay online 	<p>Explore further:</p> <ul style="list-style-type: none"> ● Should we prototype a test to apply, info etc as he suggests? ● We could design and test this for user acceptance etc. without building an actual system
<p>“When SEPA plays a consultee role they can really hold up an application”</p>	<p>Explore further: Should we check with legal; permitting; planning to see if this is a real issue?</p>
<p>“SEPA is not the only time-sponge. You’re all coming at me!”</p>	<p>Explore further:</p> <ul style="list-style-type: none"> ● Questions assumptions that we are the main player in the operators’ lives... ● Possible gain creator: Should we explore a cross-agency regulatory task force to simplify the demands on industry? AKA Sector Planning meets #OneTeamGovScot?
<p>“Annual returns just aren’t good enough”</p>	<p>(notes are unclear on this one -- please reconfirm what the issue is)</p>
<p>“I carry a box in my car for when SEPA visits. In it I keep all the licenses and paperwork that relate to the site being inspected. More than 50% of the time, the SEPA officer will have a gap in his knowledge or documentation and that’s when my mobile filing system comes in handy, not least to resolve disagreements”</p>	<p>Explore further:</p> <ul style="list-style-type: none"> ● Prototype and test a site portal service which includes all the relevant permit details and diary information about visits etc ● Run a feasibility pilot to assess the use of mobiles and tablets for officers in the field

<p>“It’s terrifying to think of SEPA officers retiring. It takes so long to build up the knowledge, every time a person moves, the whole relationship resets and we start at zero all over again”</p> <p>“With SEPA, common sense goes out the window. Because both the license conditions and inspectors take no account of specific industry knowledge, I am frequently told I must break things to measure things such as the pressure in a relief valve”</p>	<p>Explore further: This quote suggests pain points that would be relieved by</p> <ul style="list-style-type: none"> • Case management • Document management • Knowledge management and training
<p>“This practise is driven by legal”</p>	<p>NB - quote interpretation TBC</p>