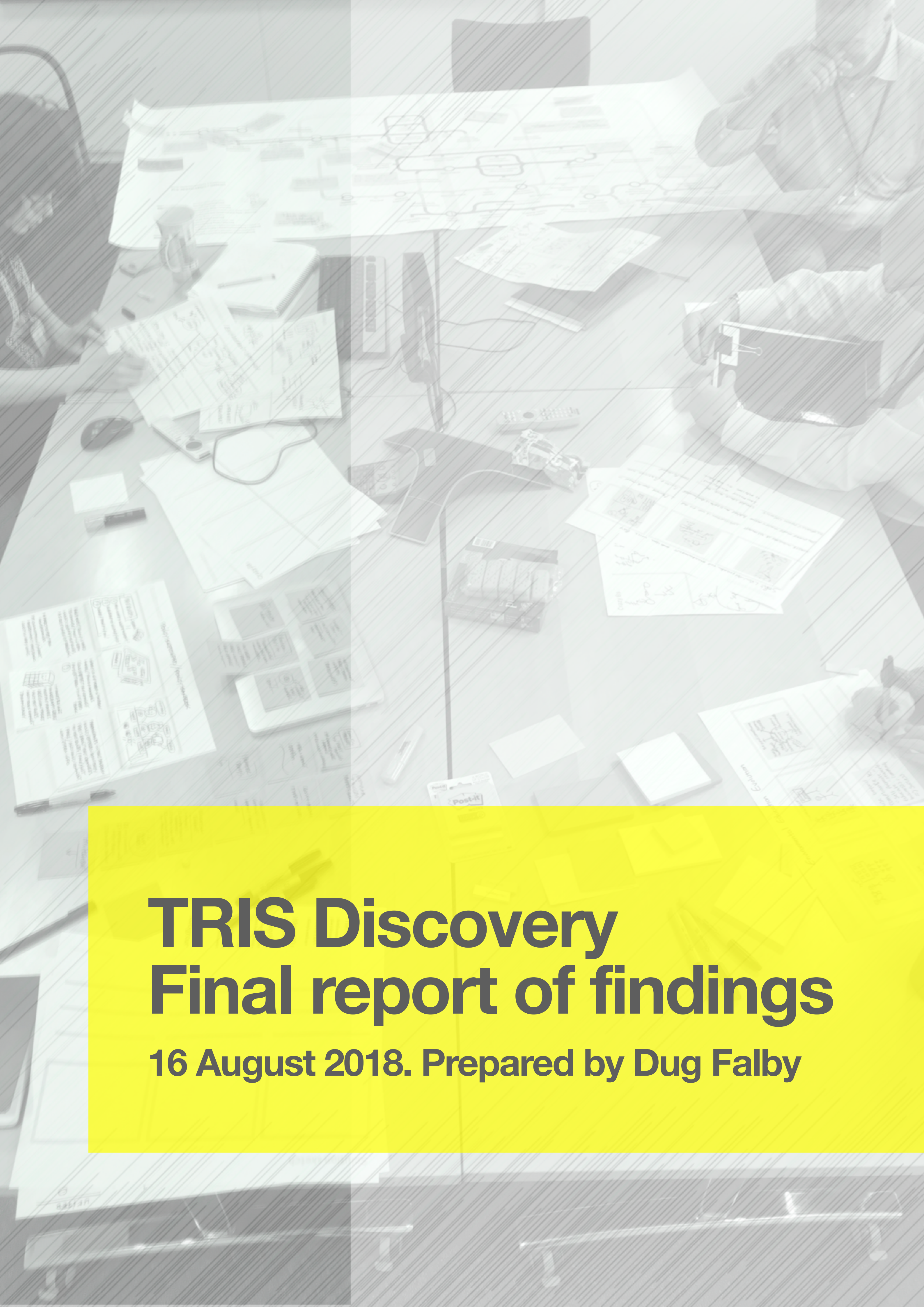


TRIS Discovery
Final report of findings

16 August 2018. Prepared by Dug Falby

Summary: The role of Regulatory Services in delivering on the Phase 2 challenge for EPAs

In spending time with SEPA front-line regulatory staff and a range of workers at site operators, we have listened to many stories. Some of these have been eye-opening, and have challenged many of our assumptions about what we do, how we are perceived, and what our role ought to be.

More than anything else, we learned from our interviews that the future of SEPA is really the future of SEPA's relationships with operators and the public.

While science is very important, and policy is very important, nothing is as important to our environment than the quality of the relationships we will build.

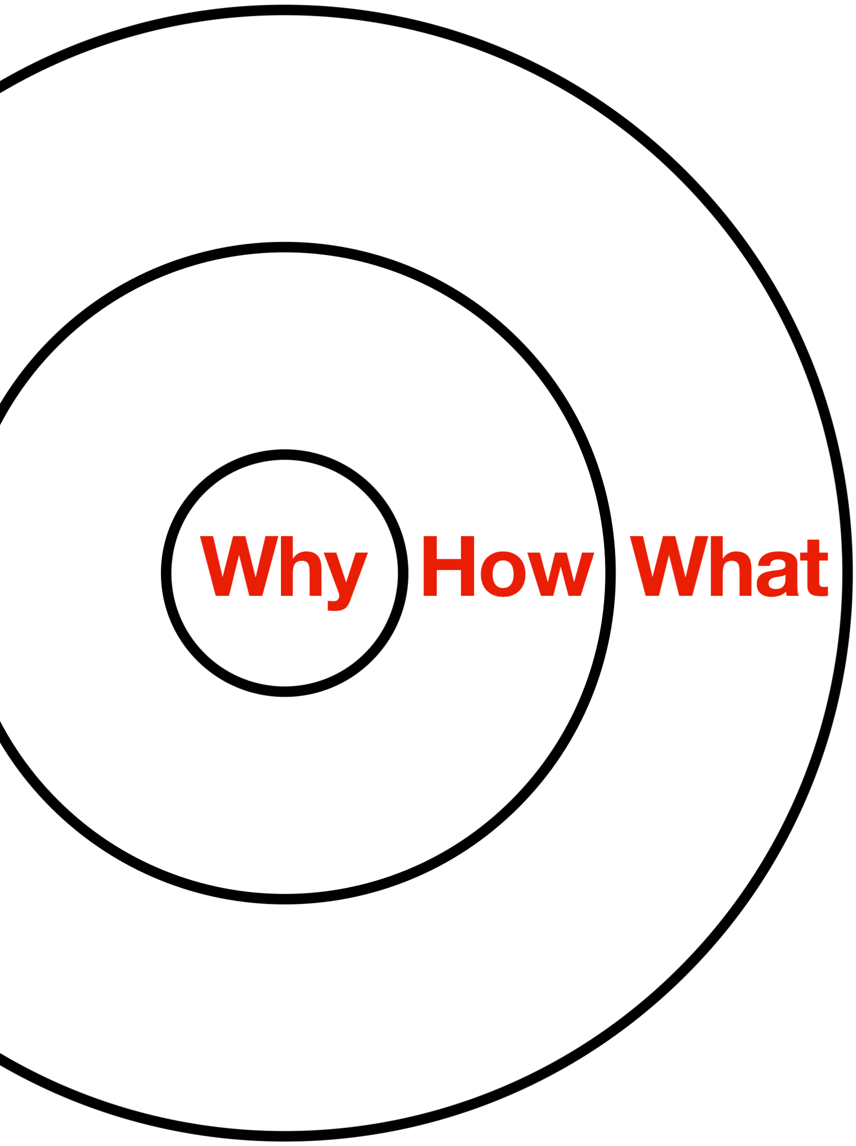
The purpose of regulatory services should therefore be to support SEPA in building the most productive relationships. The supporting capabilities we use will need to deliver on that requirement.

As a result, another shift in thinking should be thinking about compliance in the language of marketing:

> **Every non-compliant operator is a “lead”**
> **Every compliance is a “conversion”**
> **We are guiding Scottish industry through a “funnel” towards One Planet Prosperity**

This has consequences, and presents an opportunity to accelerate our progress: This is a mature technology and a mature set of methods which we can leverage.

The SEPA purpose can be framed in a “golden circle”



Why SEPA?
Because regulatory services drive relationships with operators.

Relationships with operators drive operator behaviours.

Operator behaviours will drive one planet prosperity

How?
Ensure every interaction with operators and the public is part of a coordinated whole. Treat every contact with an operator as an opportunity to grow the relationship with that operator and help them get beyond compliance

What?
A group of dedicated professionals with expertise in communications; environmental science; policy making; law; and industry operations

This view of our purpose should complement and support both our statutory purpose and our executive plan.

Improving regulatory services

When we set off on our discovery, we thought that our structures and teams where important. We felt it was key to focus on the right process, sector or business area but after interviewing front-line staff and operators this seems less clear.

Operators told us they aren't really fussed about how we do permitting.

They aren't bothered by our monitoring and assessment except they told us they had some frustrations with practical things like not understanding the wording or struggling to upload assets but on the whole, this didn't really matter to them.

They simply didn't care about how we structured our regulatory staff.

We tested how engaged they were with our sector planning efforts.

One operator ran off into his office and rummaged through piles of papers. He came back brandishing a paper document with a nice picture on the cover. It was our sector plan for his industry. He said he had tried to read it but couldn’t, but thought best not throw it out so he's been keeping it ever since. He showed us the cover letter, it was addressed to "Dear Sir/Madam".

Another operator explained that he thinks we mean well. He thinks our sector-level work is important and that he would willingly be a part of a joint body tasked with figuring out the best actions for the future.

He tells the story of being invited to join a conference where senior SEPA people fed him fancy sandwiches and discussed how the new trade body could work. He thought the meeting was useful and he felt empowered, but on returning to work, he discovered that we had raided his facility while we were in talks with him.

He used rather extreme language to describe how he felt about this.

What we learned as a result is that Operators care about certain things very much:

- They want us to treat them fairly
- They care about getting recognition for when they do well and make extra efforts to lead compliance
- They want respect and to be seen as part of the solution
- They want our people to demonstrate that respect by knowing enough about their business and their value proposition

- They want us to communicate clearly
- They want us to be consistent with our actions and our messages

Research themes

The bulk of the research was synthesised in an earlier document, available from Paula Brown. Since that document was published, we interviewed three further operators.

The three interviews reinforce the themes we discovered in the first set of interviews. These also align with the discovery work on fish farm licensing happening in the Agile team. The themes are important and we have used them in the design of the L1 blueprint and the capabilities it describes.

Wording and structure of permits and conditions

- Operator rewrites conditions to make them operational
- Operator compares EA and SEPA condition wordings (EA is better)
- License conditions vague and open to interpretation
- Variations are onerous, we should auto consolidate

Document handling

- Synchronising uploads and downloads with council planning sites
- Nowhere to attach or store media to application
- No reliable way to manage sound and video files
- Laserfiche does not work / not fit for purpose

SEPA website

- Can’t find
- Not relevant to my search
- Static
- Poor information architecture
- Cant tell if information is up to date
- Guidance hard to find and hard to use when found

Asymmetrical relationship, trust and communication

- I love my job but SEPA doesn’t recognise my experience
- Lack of trust makes dealing with FOI a problem and adds risk to future case management
- I don’t feel SEPA treats me with respect

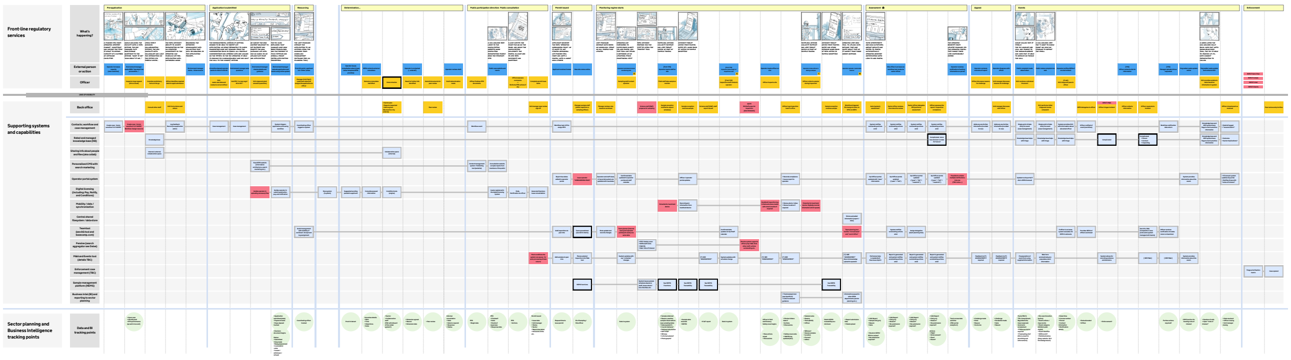
Knowledge share and collaboration

- I cary a box of records because SEPA officer hasn’t got a clue
- Officers don’t share knowledge or collaborate
- Formal or informal approach to collaborating in pre-application
- Customer portal to make data returns and asset management easier
- I worry the information will not survive the officer
- I just called last week, why can’t you tell me what happened?

We should let our research findings guide us and deliver prototypes that solve the problems that both internal and external users told us are major issues. Each of these strategy themes is an area for future focus. each is addressed in part in the proposed capability in the L1 blueprint.

Level one (L1) blueprint of to-be regulatory services

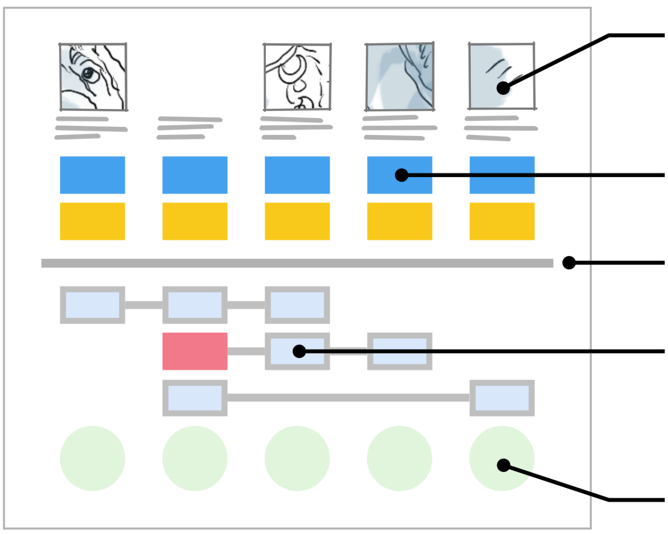
On the basis of the insights gleaned in our research phase, we have proposed a design for new regulatory services.



We have mapped proposed new capabilities to the updated processes. The capabilities in our map are there because front-line staff and external operators agree they are important.

The document maps the journey of the regulated operator over time, across the compliance life-cycle from pre-application to monitoring, through events and enforcement.

The top half of the blueprint shows what is happening to the operator or the member of the public, and what reg services staff are doing about it.



The bottom half of the map shows proposed capabilities and at what point in the journey they come into play. NB this is not a solution or enterprise architecture but this mapping of capabilities should inform the design of the solution.

This document is available as a PDF and a Visio from Paula Brown.

The bottom half of the map is particularly important because it exposes the need for teams to work together. Each capability row shows instances of that capability in the customer journey. The map makes clear that for the whole service to work, the same capabilities need to be designed to support different processes.

This means that to design the service right, teams cannot work solely within their process area.

Proposed capabilities in more detail

Contacts; workflow and case management

This capability is roughly matched by traditional customer relationship management (CRM) platforms such as Microsoft Dynamics or Salesforce. For SEPA this platform would support a “single version of the truth” as relates to customer contact data. The platform would also act as a contact centre tool and could be used to deploy other portals or shared services. The CRM would act a as window into both new and legacy systems.

Rated and managed knowledge base (KB)

Part of resolving customer issues is supported by a good quality knowledge base. This is a digital information storage system which understands quality and usefulness of data records. It offers possible information to help users and stores the ratings they give, ensuring that it always proposes the most relevant information.

Pensive (search aggregator see Delve)

The pensive tool is a major improvement to the day-to-day performance of monitoring officers. It is used as part of preparation for inspections and adds non-regulatory information to the already available information. It aggregates information which is currently all over SEPA from inspector notebooks to old records to notes in GIS. To prepare, officers will be able to see:

- V&A
- Site of interest
- Compliance history
- PPE requirements
- Team availability
- Data returns
- Other SEPA staff visiting site
- H&S RA
- Pre-inspection homework
- Failing site?
- Due dates on dashboard

- Action plan or discussion items identified?
- Data/sample
- Status of finance OK?
- Safety cover
- Local context

Personalised web CMS with search marketing

Our website is a huge part of how we communicate. In addition, all our complimentary sites such as SEPA View and social media need to be managed in the same coordinated way. In the future, the technology that manages pre-application conversations with operators; and the technology that understands what people are searching for on our website; and the technology that tells the SCC what the caller was searching for will all be the same technology. This will give us a huge step forward in building and managing our relationships. This is currently mature technology and a good fit for Microsoft stack organisations exists. A best practise search marketing and personalisation integration is to run Sitecore and Dynamics together.

Operator portal system

Across the L1 blueprint, information about sites is uploaded, downloaded and shared between inspectors, planning officers, and members of the public. In addition, sensor data is displayed by the same system and 2-way notifications with billboards in the environment will link to the same system. We are calling this system the “Operator Portal system”. It is a central location for information about a site and provides multiple views based on the identity and context of the person accessing the portal. A prototype of the portal exists and a Microsoft stack solution exists with matching functionality. For the purpose of testing an MVP, the portal system could be delivered as a customer care accelerator (CCA) on top of Microsoft Dynamics.

Digital licensing (including: Pay, Notify, and Conditions)

This capability row is a placeholder for the work being performed by agile teams in permitting. It will include a centralised permit condition management system ensuring maximum reuse and ease of maintenance of permit conditions. This should ensure our conditions are kept relevant and up to date at least as much as EA conditions (which are reviewed and updated automatically every three years)

Mobility / data / synchronisation

There are several points in the blueprint where tablet or mobile device integration will speed up operations and reduce errors which should improve our relationships with operators

Central shared filesystem / data-store

Laserfiche is not currently fit for purpose. In particular, correct use of the system translates into major manpower cost. The future will see a much more agile shared system, perhaps in the cloud, which will ensure much more robust version control and much faster and better quality search results.

Teamtool

The team tool is a shared planning and workload scheduler which seamlessly integrates with our other systems. There is currently a prototype version of this system in extensive (and very successful) use in the South West region. Microsoft stack services exist which could support this capability.

M&A and Events tool (TBC)

This is currently a placeholder capability as CLAS will need further analysis and planning before the unified toolset is produced

Enforcement case management (TBC)

This is currently a placeholder capability as enforcement processes will be agreed by the new Head of function

Sample asset and data management platform (NEMS)

This is currently a placeholder capability as NEMS will need further analysis and planning before the unified toolset is produced

Business Intel (BI) and reporting to sector planning

The understanding is that we will agree the need for data points which each business owner and these will be supplied in the most appropriate way. Microsoft stack solution exists with Power BI and similar services provided by Spotfire.

So what do we do next?

We could assign an Enterprise IT team to run a requirements gathering exercise for the whole system but that isn't best practise anymore.

Instead, a better approach would be to take a #OneTeamSEPA approach, that is, to set up initiatives to prototype and test solutions with teams that currently don't work together on projects.

We could create joint prototypes conceived and built by teams who are connected by the capability they depend on, but who don't normally work together. These outputs would be generated quickly (weeks not months) and the results fed back to the wider SEPA ecosystem.

As part of this initiative, we could take on an integration vendor with an expertise in Microsoft solutions to frame the work by teams into practical, deliverable technology.