



**PSA members' submission
to the Ministry of Social Development**

**Organising ourselves – Students, Seniors, Integrity
Services, Work & Income, and Risk & Assurance**

National Office

2 October 2014



For a better working life

New Zealand Public Service Association
Te Pūkenga Here Tikanga Mahi

The Public Service Association

The Public Service Association (PSA) is the union for Ministry of Social Development staff and currently represents over 6,000 members within the Ministry nationally. The PSA represents over 58,000 staff across the public sector.

SUBMISSION BACKGROUND

This submission is based on feedback from PSA members covered by the National Office and Ministry of Youth Development Collective (NO CEA), and members covered by the Work and Income and Students, Seniors and Integrity Services Collective (WISSIS CEA) based at National Office campus. It addresses the consultation on the Organising Ourselves proposal for Students, Seniors, Integrity Services, Work & Income, and Risk & Assurance.

A draft change management proposal has been agreed to between the Ministry and PSA and has been a part of the consultation process. This protocol covers:

- Principles associated with the change protocol
- Scope of the change
- Approach to change
- Reconfirmation
- Reassignment
- Internal recruitment to unfilled roles in the new structure
- Next steps
- Employee Assistance Programme (EAP)
- General application
- Definitions and terms.

OVERALL FEEDBACK

The extension to consultation time was welcomed

The PSA and its members would like to acknowledge the Ministry for extending the timeframe for the consultation period. The extension provided members with the space and time to think about the proposal and provide thoughtful feedback.

However, as members' questions were not answered in a timely way, this impacted on their ability to develop alternatives to the proposal

PSA members want to engage in this process. Many sought clarification on various aspects of the proposal. However, members report that the Ministry's response was at times unhelpful and often took too long, which impacted all their ability to develop alternatives.

- The PSA acknowledges that this restructure came at an extremely difficult time for the Ministry and its staff. We are aware that resources were rightfully diverted to respond to more pressing issues. However, the PSA would still like to recommend that lessons from this restructure be used to inform future restructures.

The rationale for change remains elusive for many members

While the proposal document states the reasons for the proposed changes are to:

- enable us to deliver better services for our clients
- support business strategy

- align our services and functions where it makes sense.

Members have commented that the proposed restructure will not achieve this in many areas of work, particularly those within National Office. Other members see tension between the three reasons, particularly between the need for the Ministry to deliver better services while aligning its services.

While some members see value in streamlining service lines to align with the “one-MSD” approach, few believe that the longer-term implications of the proposed restructure will lead to better services and outcomes for all clients, particularly older people.

Is the proposed structure change phase 1?

Both the proposal document and the information on doogle suggest that changing the structure is a first step and more changes will be forthcoming as a result of, for example the simplification project. Members would like this confirmed. The PSA is concerned about the fairness of this approach particularly with regard to position descriptions and the likelihood of further change.

- The PSA would like to seek an agreement from the Ministry that members would have the opportunity to have the impact of their overall change reassessed if their position description is to be changed to accommodate/enable the new structure.
- The PSA recommends that if this restructure is phase 1 of a larger plan of work the Ministry should:
 - communicate this to all staff, even if it is only at a very high level
 - include all levels of staff and the PSA in the design of the next phases of work
 - consult with the PSA early about the next phases of work and the implications for members.

The lack of detail in the proposal document has made it extremely difficult for members to engage with, and to develop alternatives

Many members are concerned about the lack of detail in the proposal. They, and the PSA, are not assured by comments such as “we’ll focus on sorting out a whole of lot of technical things, like the different processes we use and how we keep the best of what each service line does”.¹

For members, a “whole lot of technical things” are the jobs they do and clients they serve. It is very important to them.

The PSA is very concerned about the lack of detail in the proposal; therefore:

- the PSA recommends that the Ministry conduct a review within 6 months of the implementation of new structure to ensure that it is working as intended.

The process for aligning “like with like” is not transparent, and in some cases, doesn’t make sense

Overwhelmingly, the members greatest concern is the concept of moving “like with like” functions into the proposed new structure. There is a lack of transparency on how “like with like” functions across several services lines was identified.

Without knowing who was in the design team, members are concerned that people too far removed from the day to day realities of their work have made decisions about the core functions they do. Members have commented that it appears that job titles were used as the basis of matching “like with like”, rather than looking at the reality of the work done. Some members are aware that

¹ Realignment Q&As, answer to question 8.

managers were asked “what do their staff do” but this does not appear to have been a consistent approach across the teams and roles in scope of this restructure. Even if job descriptions were used to match like functions together, members have very clearly advised that many job descriptions are woefully outdated and that they no longer reflect what they do day-to-day.

The PSA is concerned that many members would appear to be on outdated job descriptions and that employment decisions are being based on these.

- The PSA recommends that as part of the overall work plan (working out the “whole lot of technical things”) the Ministry gives serious consideration to reviewing all the job descriptions in scope for this restructure to ensure they accurately reflect the actual work of members, and are consistent across the new structure in terms of remuneration ranges and titles.

Even a restructure can “build blue” if that is important to the Ministry

Many members have made the comment about how the proposal and their level of engagement with it prior to release “does not feel blue”. While it can be argued that any restructure of this size would involve decisions made behind closed doors, the Ministry has within its powers the ability to do things differently. There are recent examples of a change process that involved a very high level of staff engagement, involvement and awareness, for example Data Hub / iMSD changes.

Senior management regularly make the point that staff are the ones who know their job the best. It is extremely disappointing the Ministry chose to make limited use of this invaluable source of institutional knowledge during the design phase of the proposal.

- The PSA recommends the Ministry include staff in the design phase of any restructure.

In the new structure, staff should be permanent appointments

There are currently many roles across Work & Income, Seniors, Students and Integrity Services that are filled by people acting, on secondment or on a fixed term contract. Many staff have been temporarily in these roles for a significant period of time. The PSA has an expectation that all permanent roles in the final structure will be filled with permanent staff.

The PSA accepts that there may be a small number of roles which cannot be filled with permanent staff and alternative arrangements will need to be made, however, the Ministry have an opportunity to start anew and ensure that those arrangements are temporary and that permanent remedies are initiated immediately.

It is disappointing that a number of teams (and their organisational charts) are missing from the proposed structure – Housing, Employer Services, Contracts, Welfare Reform, Strategic Leadership & Projects, Emergency Management, and Investment Approach. Current vacancies in these teams should be considered as part of the pool affected staff can apply for.

- The PSA recommends that the current vacancies in the Housing, Employer Services, Contracts, Welfare Reform, Strategic Leadership & Projects, Emergency Management, and Investment Approach are ring-fenced for affected staff.

Members from the smaller service lines believe their job satisfaction will be lost in the proposed new structure

Many staff in the smaller services lines (Students, Seniors) take a task, function or service from beginning to end. This provides them with a great deal of job satisfaction and creates a high level of

staff engagement. Members are greatly concerned that their current practice will be lost when their position is moved into a new team.

The PSA have been advised by the Ministry's Human Resources team that staff from the smaller service lines will continue (in the medium-term at least) to perform all of the tasks in their role.

The PSA is very concerned that this has been a continued source of confusion for many members, which suggests that the key messages of the restructure may not have been communicated effectively to staff.

- The PSA recommends that the decision document includes an explicit statement that staff in the smaller service lines will continue to undertake all the tasks in their current role.

Some roles are being disestablished while others are not – this is not consistent

Although disestablishment and reconfirmation are terms that come into effect once a decision is made the consultation does indicate disestablishment and reconfirmation. This has raised questions about the differences that lead to disestablishment and reconfirmation.

My proposed role looks significantly different to my current role

Some members have indicated that they feel their proposed role is a significant change. The PSA and Ministry have agreed in the past that significant change in a role is a change of 20% or more between current and new job descriptions. Based on previous experience this is always addressed fairly late in the process.

- The PSA recommends that the Ministry does a full account before they make a decision so they can clearly articulate with members and staff their assessment of difference in job descriptions.

What are the implications for other parts of the Ministry?

A change of this magnitude will impact other areas of the Ministry and in the recent past the PSA has been involved in managing minor change processes for staff in Finance to accommodate a larger change process. The PSA is keen to see some acknowledgement of other business units impacted by this change in the decision document. The groups that the PSA has already identified are Finance, Legal Services and potentially IT.

- The PSA recommends that the decision document includes the impact of decisions on Finance, Legal Services and IT.

We expect that staff will be given the opportunity to provide feedback on the new job descriptions

The PSA has a very high expectation that the decision document will contain the draft job descriptions that are available to the PSA and its members to provide feedback on prior to them being considered by the Ministry's job sizing panel as per the Ministry/PSA agreed job evaluation protocol.

- The PSA recommends that the decision document include the timeframe for members to provide feedback on the new job descriptions before they go to the job-sizing panel.

Collective Coverage

Where members are moving from coverage of one Collective Agreement to another i.e. Work and Income and Students, Seniors and Integrity Services Collective Agreement to the National Office and Ministry of Youth Development Collective Agreement the change protocols must be adhered to. This means that members cannot be reconfirmed or reassigned into their current position/s as the "terms and conditions" of employment will change.

How will we transition to the new structure?

It would have been very valuable for the proposal document to explain how people and their functions will transition into the proposed structure.

- The PSA recommends that the decision document clearly identifies transition of functions into new roles and provides a clear timeframe.

STUDENTS NATIONAL OFFICE: SPECIFIC FEEDBACK

The timing for implementation needs to be different for Students National Office

Members at National Office have suggested that the implementation of decisions in relation to Students National Office should not be delayed until April 2015. This is because the work-programme for National Office staff is around 6 months ahead of regional staff. It makes sense to delay implementation of decisions for the regional until after the peak period but delaying for National Office will create additional problems and workload pressures.

- The PSA recommends that the implementation of any decisions impacting on Students National Office should be done as soon as possible, and not delayed until April 2015.

The proposal does not take into account all the work done by the Students - Service Development team

Under the proposal, the Service Development team will be moved to Online and Infrastructure, reporting to a new manager of Digital Services. Currently the online work done by Service Development is separate to the SAL system work. StudyLink members are unable to see where the SAL system work has been moved to the proposal. Feedback from Work and Income members suggests that there is not the capacity or knowledge to take on SAL system work.

Feedback from members in this team indicates that two-thirds of their work is proposed to move to the new Service Development stream or Business Solutions. Furthermore, the proposal fails to recognise the interaction between the Service Development team and service delivery, policy and other parts of the current Studylink model. The proposal reads like these roles will lose SAL system work and budget projects.

The proposal puts the Ministry's relationship with key stakeholders at risk

Over a significant period of time, the StudyLink team have developed good relationships with approximately 600 stakeholders, including education providers and student unions. These relationships have been instrumental in developing robust and viable budget initiatives. There is no mention in the proposal document of how the relationships built up by Studylink will be maintained in the new structure. Members consider this a significant risk to and for the Ministry, particularly in its ability to engage effectively with stakeholders.

The Partnerships & Programme team is currently the team responsible for relationship management with key stakeholders. If there is no intention to move this responsibility for the relationships built up by StudyLink,

- the PSA recommends that consideration should be given to including Students' staff into the Partnership & Programme team.

The proposal to split the functions of the StudyLink – Business Support team will not meet the overall objectives of the restructure

Under the proposal, the functions of Business Support team will be split across two teams. That is, the current proposal suggests moving the Senior Business Support Analyst position into the Operational Policy and Practice team, and the Business Support Advisor/helpdesk positions into the

Operational Support team. Members are concerned that the functions of this team in its current structure are not fully understood. By separating the team and there is a risk to the Ministry in relation to operationalizing policy with the effect that policy advice will not meet the needs of our clients.

The current title of Business Support Advisor/Helpdesk is a relic from a previous restructure in which operational policy roles were largely disestablished across the Ministry. This did not stop the work of operational policy being undertaken in this role as many were reconfirmed into roles that had a substantially different title, even though the work they did was operationalizing policy still substantially in respect of operational policy. For members who currently have the job title of Business Support Advisor/Helpdesk, are very concerned that what they actually do has not been fully taken into consideration in the development of the proposal. The specific issue is that “helpline” functions are a very small part of their role. What takes up the bulk of the role is the development and implementation of policy.

- The PSA recommends that a better fit would be Service Development – Operational Policy & Practice. We also recommended that as part of the implementation process, the job title and job descriptions of the Business Support Advisor/Helpdesk role is reviewed to ensure that they rightly reflect what is expected of these positions.

SENIOR SERVICES NATIONAL OFFICE: SPECIFIC FEEDBACK

Disestablishment of Seniors Client Information team

The inconsistent approach to disestablishing roles or “lifting and shifting” roles requires a robust explanation. Members in the Seniors Client Information team are very concerned that their roles are being disestablished whilst current Work and Income ‘client information’ staff have been ‘lifted and shifted’ and they do not believe that the rationale for disestablishing their roles is robust.

Page 40 of the consultation document states that:

The proposed Engagement team would require a dedicated focus on specialist communications disciplines and delivery to support the expanded service group. This includes campaigns, internal communications, stakeholder engagement and account management.

This statement, together with proposed disengagement in the consultation document, implies that Seniors Client Information Advisors are not currently undertaking these functions.

The Seniors Client Information Advisors actually undertakes a range of specialist communications functions, including: campaigns for SuperGold Card and other Government agencies, project communication, Seniors website, Seniors forms, internal communications (including Seniors doogle), stakeholder engagement and account management.

- The PSA recommends that the Ministry takes this opportunity to rectify this situation by ‘lifting and shifting’ the Seniors Client Information Advisors into the proposed Engagement team.

Movement of Seniors Business Support Analysts to the Operational Policy and Practice team within Service Development

One of the stated goals of the proposed new structure is to align like functions. Members cannot understand the rationale for:

- Team Leader Business Support
 - with Seniors business support analyst reporting to them
- Team Leader Operational Policy and Practice

- with operational policy and practice advisors reporting to them.

The current Senior Services job titles are the result of a past Ministry-wide restructure (2009) that saw the disestablishment of the Operational Policy team within the policy cluster, as well as the International Services policy team. The job title of Business Support Analyst represents a significant devaluation of the work currently done and in comparison to other Work & Income Operational Policy staff. Moreover, it represents limited career path.

Business Support Analysts have worked with their Work & Income colleagues on crossover pieces of work over the past five years. The current job titles and the proposal to retain them in the new structure will bring this inequity into stark relief.

- The PSA recommends that the Ministry takes this opportunity to rectify this situation by changing reviewing the job description to accurately reflect what they do and change the title to Adviser/Senior Advisor, Operational Policy & Practice.

There is a lack of understanding about the functions undertaken by the Operations Analyst – Specialised Processing Services

Members are very concerned that the work undertaken by the current role of Operations Analyst - Specialised Processing Services is not fully understood. While service quality monitoring and reporting is an important function it is not the majority of the role. The key function of this role is to provide high-level operational and technical support services, which includes analysing complex statistical, financial and technical data and developing, implementing and maintaining technology solutions.

It is proposed that this role is moved into Operations Centre, the Workforce Management, and Planning & Analysis team. It would appear that this team will be made up of the current Work & Income Call Centre Operations team. As the role of Operations Analyst - Specialised Processing Services does not have contact centre component in the role; this does not seem the right fit.

- The PSA recommends that the role and functions of Operations Analyst for Specialised Processing Services would align more with the Centralised Services team.

The proposal will not deliver better services for senior clients and puts at risk our relationship with key stakeholders

The key rationale for change is to enable the Ministry to deliver better services for clients. Members working in Senior Services strongly believe that the rationale to align functions is progressing at the expense of services to frontline staff, key stakeholders like Grey Power and Age Concern, and most importantly our clients.

Additionally, the proposed changes represent a risk to the Ministry to provide the Minister for Senior Citizens with a high level of support. Through the Office for Senior Citizens, the Minister is provided with information about local initiatives and activities. For example, Napier Connects (the project to reduce social isolation) relied on the contacts of local Senior Services staff to effectively engage with community stakeholders.

The current proposal suggests that one position in the Partnership and Programmes team would come from Senior Services. This proposed resourcing does not reflect the significant level of stakeholder engagement required.

Senior clients are our largest client group, and will only get larger with a demographic shift to an ageing population. National Office Seniors support frontline staff to meet the needs of our older clients. Members are strongly of the view that the proposed changes to Senior Services nationally

will impact on the Ministry's ability to serve the needs of older New Zealanders in the most appropriate way, and will lead to reduced client engagement and satisfaction with our services. The Ministry's data shows that older people are less likely than other age groups to access their full and correct entitlement for supplementary assistance such as AS, TAS. Internal research suggests that many older people are uncomfortable with visiting a Work & Income site. And while older people's use of accessing services online is growing, it is still well behind that of other age groups.

- The PSA recommends that the decision document states how the Ministry will ensure that older clients are able to access all the assistance they need in a safe and timely manner, and how the removal of Senior Services will lead to better services for older people.

INTEGRITY SERVICES NATIONAL OFFICE: SPECIFIC FEEDBACK

The Collections Business Improvement team do more than business improvement

The Collections Business Improvement team also has responsibility for operational policy, a role that is carried out by another group within the proposed structure. However, there is no dedicated or experienced Collections role amongst those. The proposal fails to explain how the Operational Policy & Practice team will operationalize Collections policy.

The work Collections members do in the operational policy area is not well reflected in their position descriptions. In completing this work well these members and staff have minimised the Ministry's risk of operating outside of legislation. To become more removed from operational policy is likely to impact their capacity to develop good business improvements and puts the Ministry at increased risk.

- PSA recommends that the decision document details how the different areas within the Service Development group would interact and support each other's decision making, and how the Collections policy will be operationalized and by which team.

Loss of priority for Collections and Fraud

The proposal fails to clearly identify where staff from Collections, Fraud and to a lesser extent Internal Fraud will go to when they have information needs with the proposed disestablishment of the Integrity Services Information Reporting and Analysis (ISIRAT) team. Furthermore, the change from a dedicated resource to a cross-Ministry resource indicates a loss in priority for this group.

- The PSA recommends that the final decision document clearly details which teams/groups will be responsible for providing the on-going support that the ISIRAT team currently provides and the transitional arrangements as these groups get up to speed with the process.

Where is the consideration of Integrity Services business systems in the proposed new structure?

Members have expressed concern that the proposal does not appear to consider the business systems used by Integrity Services. These systems are vital for staff Collections (TRACE and COMET), Fraud Investigation (IMS) and Integrity Intervention Centre (AIMOS) to fulfil their roles and functions and delivery on the Ministry's priorities.

Currently, Integrity Services struggle to get improvements for these systems now and members are concerned that there may be no-one left with any knowledge of the systems that are used by over 400 staff. With the UCVII retirement in 2015 which all of Integrity Services use and the implementation of Single Client Management System, Integrity Services needs to be represented and have the opportunity to have their requirements included.

Is this a move forward or just back to the future?

The proposed changes have a lot of familiarity about them for the Investigation Hubs. In June 1996, the then New Zealand Income Support Service reviewed how best to respond to benefit crime which led to the establishment of a dedicated fraud unit. These units have gone a long way to achieving significant gains in benefit fraud detection and the proposal fails to identify how they can better achieve those goals and more significantly how the detriments of being a part of Work and Income identified in the review are no longer relevant.

- The PSA recommends that the decision document details how the proposed structure enables better fraud detection than what already exists.

Why are only some functions being 'lifted and shifted'?

The Integrity Services Information Reporting and Analysis team (ISIRAT) has a lot of knowledge particularly about Collections and Fraud related data and the PSA believes the Ministry is making a mistake to disestablish this team.

- The PSA recommends moving the team in its entirety to Insights MSD to preserve the functions and institutional knowledge the Ministry needs.

ISIRAT currently provide a lot of operational information that impacts the daily workload of staff as opposed to just regular reporting. The proposed new roles seem too distant and too few to have the capacity to meet the current basic needs of our clients.

- The PSA recommends that the decision document clearly details how this loss of expertise will be addressed in the new structure.

The rationale for moving teams into Service Development is elusive

Many of the teams that have been moved into Design and Improvement have a much broader range of skills and responsibility for improvement than the Work and Income structure they are being fitted into.

Members are concerned that the result will be diminished roles and only completing part of a project. This is often less satisfying as the sense of completion is lessened. Diminished roles and reduced job satisfaction has a long-term effect on productivity and retention.

Some members have suggested that Collections NFIU and the IIC Business Improvement teams are not moved to Service Development – Design & Improvement team. Rather they still come under the Service Development structure but report to a separate National Manager. This would still deliver on the overall aim of the proposal to increase collaboration while retaining the specialist knowledge and skills.

There are parts of the proposal that are positive for Integrity Services ...

Members are pleased that several functional teams from Integrity Services are staying together as they are very small teams with great working relationships. If these teams were separated it would diminish the functional importance of these areas being well coordinated and effective. The people in these areas are the experts for their areas of policy, processes and IT systems.

... so why isn't this happening for StudyLink?

Is there a reason that StudyLink did not have the same 'lift and shift' for their business improvement area (like Integrity Services)?

- The PSA recommends the decision document addresses this inconsistency and details where the business improvement for the Students service line will sit in the new structure.

The size of some of the proposed teams are concerning. How will managers undertake their responsibilities to have meaningful performance conversations with their staff?

The Chief Executive clearly signalled his expectation that staff have regular and meaningful conversations with their manager about their performance and development. The purpose is to develop staff capacity, ensure the Ministry meets its deliverables, and to build the “blue culture” across the Ministry.

Members see a risk with the increased number of direct reports for some managers. They are concerned there will be “bottle-necks” for progressing work – risking delivering on time. In addition, the significant growth of some teams may be an impediment to developing an inclusive and co-operative culture. Members see a risk of teams developing within teams, creating more silos.

Another concern raised by members is ensuring work gets signed-out by the GM in a timely way. Currently, all written material from Service Development is required to be signed-out by the GM or her office. Additional staff and work will create a bottle-neck if this process is not reviewed.

- The PSA recommends the decision document addresses the concerns members have around resourcing.

The proposed new structure will mean a doubling in size but there is only one Office Administrator

The additional size of the Work & Income National Office will need additional administrative support. The proposal does not address this.

Teams that are out of scope but part of the structure, should have been included so duplication of functions and services could be fully addressed

The consultation document states:

“Our goal is to be more integrated in the way we deliver services to MSD’s clients – one that is more than just the sum of its parts; an organisation that is fundamentally organised around the people who use our services, not around our internal processes and structures.”

But there is no clear rationale for why Housing, Employer Services, Contracts, Welfare Reform, Strategic Leadership & Projects, Emergency Management, and Investment Approach teams were not included in the proposed restructure.

Some members have the view that including the Employer Services and Contracts teams in the restructure may reduce overall duplication functions.

Other members have suggested that Contracts would “fit” well within the proposed Centralised Services pillar. The functions and services undertaken by Employer Services are currently done across the Service Development pillar. In addition, leaving out how our employment services are developed, organised and delivered horizontally across the organisation and vertically at national, regional and local levels, is a very glaring omission – especially reducing benefit numbers through employment is a priority for the Ministry and Government.

The inclusion of all teams across the structure would help members gain a fuller understanding of the “big picture” and what the Ministry is attempting to achieve. And more importantly, there may be vacancies in these teams that could be “ring-fenced” for affected staff

- The PSA recommends the decision document clarifies why some teams/areas were excluded from this restructure.

Why are some senior management roles disestablished and others not affected? This does not appear consistent.

The National Commissioner's team doubles in size and takes on responsibilities for parts of Students, Seniors and Integrity Services work-programme. This would seem to represent a significant change to the National Commissioner role and members have questioned why this role was not affected.

Why are most senior advisors reporting to managers or directors but those in the DCE Office will be reporting to a team manager?

Members have suggested that this is not a consistent approach, nor treating "like with like". Moreover, for senior advisors in the DCE Office, reporting to a team manager represents a down-grading of their role.

SERVICE DEVELOPMENT: SPECIFIC FEEDBACK

The existing structure of the Service Development pillar is just over 12 months old. It would make sense to take the time to evaluate if this is working as intended before significantly expanding it

On page 3 of the Service Development Group Proposed New Structure: Consultation Document (June 2013) the proposed structure was "designed to meet future demands without requiring further change".

The overarching goal of the 2013 restructure was to reduce duplication, create clear handover points and promote cross-team work. Members suggest that this is not working as intended. In theory the work flows across the teams but this does not happen in practice. At the moment teams are doing bits of everything so there's not a lot of fluidity across the wider service development group. Teams and their role and responsibilities need to have greater clarity. Some members report they have sought clarification about their roles and responsibilities from their managers. The response has been an acknowledgement that this still needs to be worked through. The result has been that staff continue to complete work as they did prior to the 2013 restructure, rather than pass work through several teams as intended.

Since the 2013 restructure of the Service Development team, the ability to move Advisors and Senior Advisors to the areas with the high work levels has been lost – putting teams under increased pressure while reducing the flexibility of the business unit to manage workload.

The current design also presents a challenge to other business units across the Ministry. Staff need to know who to approach when they need information because, in practice, people still tend to go to the people with the subject expertise.

- The PSA recommends the Ministry undertake a review 6 months after implementing the new structure to ensure that Service Development is operating as intended.

The size of some teams and the number of direct reports for some managers is a concern

Constructive staff management has been identified as a key aspect of the Ministry making the best use of its most valuable resource – its people. The PSA recommends the size of teams and the number of direct reports per managers is reviewed to ensure effective staff management.

The rationale behind the decision that Work & Income managers were not affected when the same positions within Senior Services, StudyLink and Integrity Services requires a more robust rationale

This decision has contributed to the overall sense that the smaller service lines have simply been squashed into the Work & Income structure.

- The PSA recommends that the decision document provides a clear rationale for the decision not to include affected Work & Income managers in the same way as the other service line managers.

As the Service Development group doubles will the service development leadership also increase?

The GM office will need to increase their capacity to cope with the work programme flow in and out of the wider team with allocation and sign off. There's no indication that the GM office will increase so how will the GM office be positioned to avoid a bottle neck with the increased amount of work that will inevitably flow through that office.

Members have raised concerns that with an increase in staff and service lines, there is an increased risk in progressing work to sign-out point across all the teams within Service Development. This is due to the reduction in subject matter experts at management level (particularly in relation to the smaller service lines), and an increase in the number of direct reports.

- The PSA recommends that members concerns about resourcing issues are addressed in the decision document.

Service Development - Operational Support team

Members are concerned about the number of staff directly reporting to TM Operational Support (15), and believe this is too many direct reports for effective management of staff.

The Senior Advisors and Quality Advisors directly support regional staff, for example, they complete quality reviews on clients' files. As these roles are more aligned with regions,

- the PSA recommends that consideration should be given to moving these positions to the Operations Centre.

Service Development - Partnership & Programmes team

Members are concerned about the level of resourcing to maintain the relationships built up by Senior Services and Studylink, particularly as there will be no staff from Students moving into this team.

Members are concerned about the resourcing provided to support the Key Account Manager, SuperGold Card. Currently, this role is supported by other staff within Senior Services. There is no indication that the same level of support will be provided within Partnerships and Programmes. The lack of support represents a risk to the Ministry in relation to failing to meet the Government objectives around the SuperGold Card programme – that is grow the programme. The SuperGold Card programme has a high public profile and attracts media attention. Any reduction in service will be noticed. Moreover, National Party policy specifically states they want to expand the SuperGold Card programme by growing the number of businesses involved.

- The PSA recommends that the decision document details how the relationships built up by StudyLink and Senior Services will be managed.

Service Development – Design and Improvement team

Members are concerned with about the size of the team and feel it is too big to be efficient.

In addition, it would appear that part of the work-programme of this team will include StudyLink service design. But under the proposal there are no StudyLink people moving into this team.

- The PSA recommends that members concerns about resourcing issues are addressed in the decision document.

Service Development – Design and Improvement, Fraud and Collections

Members have questioned whether the proposal that a Team Manager (Collections), two Senior Advisors and three Advisors report to the National Manager Design and Improvement is the right fit. This group may better align with National Manager Design & Improvement, Fraud.

- To avoid confusion, the PSA recommends that the title of National Manager Design and Improvement be changed to National Manager Fraud, Design and Improvement.

Service Development – Operational Policy and Practice team

Members have questioned the size of this team as it is too big to be effective. The National Manager Operational Policy & Practice has nine direct reports.

- The PSA recommends that members concerns about resourcing issues are addressed in the decision document.

Service Development – Planning and Analysis team

Again, members are concerned with the size of the team and the number of managers' direct reports. The reporting functions of this team align with iMSD, who they work closely with. Members have advised that often information is requested via Planning and Analysis to iMSD, which then returns to Planning and Analysis before finally getting the requestor of the information. This suggests double-handling of a request, which is not efficient or timely.

CENTRALISED SERVICES: SPECIFIC FEEDBACK

The size of teams and number of direct reports for some managers is concerning

Members have noted that there is a wide variety in the size of team within the proposed Centralised Services team. They are concerned some managers have a large number of direct reports, while others have very few.

Constructive staff management has been identified as a key aspect of the Ministry making the best use of its most valuable resource – its people. The PSA recommends the size of teams and the number of direct reports per managers is reviewed to ensure effective staff management.

The PSA recommends:

- that the decision document provides the rationale behind the size of teams and number of direct reports per manager
- that members concerns about resourcing issues are addressed in the decision document.

OPERATIONS CENTRE – HELPLINE: SPECIFIC FEEDBACK

Members are disappointed that their request seeking the rationale for the changes to their team was never answered

Members from Helpline do not believe that the Operations Centre is the most effective structure for the work they do. To get a better understanding of the proposal they sought clarification via the dedicated email address and through the PSA delegate structure. The information was not forthcoming.

How will the Operations Centre operate?

Helpline currently organise, plan and implement Training for Helpline Advisors and Data Integrity Analysts, as well as manage staff rosters and plan leave allocations. Members question if, under the proposed structure, Helpline will continue to manage these responsibilities or will these functions be

undertaken by roles within the Operations Centre, for example, Business Advisors/Operations Analyst.

- The PSA recommends that the decision document clear states the proposed functions of the Helpline team in the new structure.

Helpline and Data Integrity are unique

Helpline and Data Integrity are unique in the sense that the team has a vast knowledge and expertise and is equipped to provide basic and complex legislative, policy and general information and support to all units under the umbrella of MSD including National Office Teams. Will Help line and Data Integrity remain the unique unit that it currently is?

There is a lack of understanding about the functions undertaken by Helpline and Data Integrity Unit

Members in Helpline and Data Integrity Unit are very concerned that the work undertaken by them is not fully understood. The key function of the Helpline role is to promote continual improvements in service quality by advising on processes, policies, systems, legislation and business practices. Whereas, the key function of Data Integrity Unit role is to **safeguard** the integrity of the Ministry's data on SWIFTT/TRACE/SOLO/WAM/CMS/ UCVII by maintaining core data.

Both teams contribute to the ongoing development and implementation of new and revised operational policy and legislation in the business. This is achieved through coaching and training staff by telephone, emails and remote access and by attending meetings as requested. They also identify faults within the Ministry's computer programmes.

They also complete sensitive reports and processing for MSD such as Witness Protection Program, Vulnerable Children Reports, Housing Support Product Approvals, UCB reviews, Child Sex Offenders list and Multiple Children reports.

How will the Operations Centre Team help to support Helpline and Data Integrity Unit?

Helpline and Data Integrity Unit Team Leader currently reports to the National Manager of Operational Support, Service Development. Members strongly believe that this remains the best fit for the work they do. Currently we are able to escalate queries, issues, resolutions and able to promote continuous business improvements directly through to our larger team/s within Service Development such as Operational Policy and Practice and Partnership and Programmes Team.

Our escalation process will be lost if our reporting line changes. We need to be at the forefront of any new implementations and/or process and practice changes from Service Development.

- The PSA recommends that Helpline and the Data Integrity Unit Team Leader continue to reports to the National Manager of Operational Support, Service Development.

The process for aligning like with like is not transparent, and in some cases doesn't make sense

Members greatest concern is the 'like with like' functions. Helplines core role is to communicate by 'telephone' which is the only 'like' process similar to those in a Contact Centre. It appears the Operations Centre has a large number of contact centre type support roles such as a Roster Administrator, Business Advisor and Operation Analyst Studylink. We are an odd fit.

Will this mean more resources for Helpline/Data Integrity Unit?

The concern that we have is that Seniors, Studylink and Integrity Services all currently have their own support teams for the delivery of their services. With the proposed changes, there will be an increase in work for both Helpline and Data Integrity Unit.

Impact on the Ministry

Members are very concerned that their role of promoting continual improvements and the identification of risk will be lost if the team is moved to Operations Centre, which appears to have a focus on Contact Centre Operations.

Potential risk to the Ministry

Members have identified that the move of Helpline to the Operations Centre may result in other staff experiencing a delay in response in relation to internal and external key stakeholders' queries

Members are concerned that the proposed change will result Helpline and Data Integrity Unit will losing its direct line of communication in relation to policy, legislation and system changes.

Due to the teams' knowledge and expertise, members are requested to complete work from other teams within Service Development. Members are concerned about what will happen to these requests if they are moved into the Operations Centre. (Examples of these requests - Witness Protection Programme, Domestic Violence Programme, International Custody Dispute, DPB-CSI retrospective reviews, Vulnerable Children reports, TRIM, Internal and External stakeholder emails queries, UCB reviews – Grandparents Raising their Grandchildren, and Housing Support Product Approvals.)

- The PSA recommends that Helpline and Data Integrity Unit team remain within the Service Development pillar because of the expertise and knowledge that they hold and contribute to the wider Ministry.

ENGAGEMENT – COMMUNICATIONS: SPECIFIC FEEDBACK

As the workload of this team is expected to increase under the proposal,

- the PSA recommends that consideration should be given to including an additional digital advisor into the team.

As Seniors Client Information Advisors undertakes a range of specialist communications functions but there is no plan to include Seniors in the Engagement team,

- the PSA recommends that 'the Seniors Client Information Advisors are included in the proposed Engagement team.

LEARNING AND CAPABILITY: SPECIFIC FEEDBACK

Where is the Senior Services expertise in the proposed new team?

All of the service lines need the services of the Learning and Capability team. Members are concerned that the proposal ensures the team has expertise in relation to StudyLink and Work & Income, but not Senior Services.

- The PSA recommends consideration is given to ensuring this team has the expertise to provide services that can address the whole of the Ministry's client group.

RISK AND ASSURANCE NATIONAL OFFICE: SPECIFIC FEEDBACK

While the proposed change seems a return to previous structures (Internal Fraud team returning to Risk and Assurance), members did not have any significant concern with the proposed change.

RECOMMENDATIONS

The PSA would like to make the following recommendations:

1. The Ministry commit to reviewing the changes to ensure that intended rationale, aims and Ministry goals are being met. The PSA would strongly urge that this would involve surveys and conversations with staff at all levels.
2. The Ministry commit to engaging with clients to ensure they do not experience a reduction in services, and ensure that more vulnerable groups have the opportunity to provide feedback.
3. The Ministry Commit to seeking feedback from key stakeholders of all the service lines (StudyLink, Senior Services) to determine if this have been maintained and strengthened by the new structure.
4. Lessons from this restructure are used to inform future restructures within the Ministry, particularly in relation to the lack of detail.
5. The PSA would like to seek an agreement from the Ministry that members would have the opportunity to have the impact of their overall change reassessed if their position description is to be changed to accommodate/enable the new structure.
6. If this restructure is Phase 1 of a larger plan of work the Ministry should:
 - communicate this to all staff, even if it is only at a very high level
 - include all levels of staff and the PSA in the design of the next phases of work
 - consult with the PSA early about the next phases of work and the implications for members.
7. The Ministry conduct a review within 6 months of the implementation of new structure to ensure that it is working as intended.
8. As part of the overall work plan (working out the “whole lot of technical things”) the Ministry gives serious consideration to reviewing all the job descriptions in scope for this restructure to ensure they accurately reflect the actual work of members, and are consistent across the new structure in terms of remuneration ranges and titles.
9. The current vacancies in the Housing, Employer Services, Contracts, Welfare Reform, Strategic Leadership & Projects, Emergency Management, and Investment Approach are ring-fenced for affected staff.
10. The decision document includes:
 - i. an explicit statement that staff in the smaller service lines will continue to undertake all the tasks in their current role
 - ii. the impact of decisions on Finance, Legal Services and IT, and how any impact will be addressed
 - iii. the timeframe for members to provide feedback on the new job descriptions before they go to the job-sizing panel
 - iv. the process to transition of functions into new roles and a clear timeframe for this transition.

11. The implementation of any decisions impacting on Students National Office is done as soon as possible, and not delayed until April 2015.
12. Consideration be given to including a Students staff member in the Partnerships & Programme team to ensure relationships with key stakeholders is maintained.
13. The Business Support Advisor/Helpdesk (Students) role is better aligned in Service Development -Operational Policy & Practice.
14. The Ministry give serious consideration to “lifting and shifting” Seniors Client Information Advisors into the proposed Engagement team
15. The Business Support Advisor/Helpdesk role is reviewed to ensure that they rightly reflect what is expected of these positions.
16. The job description of Business Support Analyst role is reviewed to accurately reflect the work done
17. The Seniors Business Support Analyst role (2 positions) title is changed to Adviser/Senior Advisor, Service Development -Operational Policy & Practice.
18. The role and functions of Operations Analyst for Specialised Processing Services (Senior Services aligns better with the Centralised Services team.
19. The decision document outlines how the Ministry intends to ensure older people are able to access all the assistance they need in a safe and timely manner.
20. The decision document identifies how the removal of Senior Services will lead to better services for older people.
21. The decision document to provide details on how the different areas within the Service Development group would interact and support each other’s decision making, and how the Collections policy will be operationalized and by which team.
22. The decision document details which teams/groups will be responsible for providing the on-going support that the ISIRAT team currently provides and the transitional arrangements as these groups get up to speed with the process.
23. The decision document details how the proposed structure enables better fraud detection than what already exists.
24. The Integrity Services Information Reporting and Analysis team (ISIRAT) is moved in its entirety to Insights MSD to preserve the functions and institutional knowledge the Ministry needs.
25. The decision document clearly addresses the concerns members have around resourcing, particularly in relation to the number of direct reports per manager and how the Ministry will ensure quality conversations between staff and managers about performance.
26. The title of National Manager Design and Improvement is changed to National Manager Fraud, Design and Improvement to avoid any confusion.

27. The decision document clearly states the proposed functions of the Helpline team in the new structure.
28. Helpline and the Data Integrity Unit Team Leader continue to reports to the National Manager of Operational Support, Service Development.
29. The Helpline and Data Integrity Unit team remain within the Service Development pillar because of the expertise and knowledge that they hold and contribute to the wider Ministry.
30. Consideration is given to including an additional Digital Advisor in the Engagement – Communications team.
31. The expertise of the Learning and Capability team is reviewed to ensure team has the expertise to provide services that can address the whole of the Ministry's client group.

Thank you for the opportunity to provide feedback on the proposal for consultation.

Virginia Wilton

PSA delegate

on behalf of the PSA members in Students, Seniors, Integrity Services, Work & Income, and Risk & Assurance, National Office