PSA members' submission

to Ministry of Social Development

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

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 6000 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 Work and Income and Students, Seniors and Integrity Services Collective Agreement outside of National Office coverage. 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 in time has provided members with the space and time to make considered and thoughtful comments and suggestions about the proposal.

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, the Ministry's response was not always helpful and often took too long.

The rationale for change remains unclear to 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

Many members cannot see if the rationale has been clearly tested for all areas of work, or that it enables the proposed outcomes of the change process across MSD.

Others believe that there is tension between the three reasons, particularly between the need for the Ministry to deliver better services and the other two.

Many members can see the value in streamlining service lines to align to support the "one-MSD" approach, but few believe that the longer-term implications of the proposed change will lead to better services and outcomes for clients. This is a particularly concern of more vulnerable clients, older people and students.

Is the proposed structure change just the beginning and more changes are to come?
Both the proposal document and the information on doogle suggest that changing the structures is a first step and more changes will be forthcoming, for example the simplification project.

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 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, the "whole lot of technical things" are the jobs they do and clients they serve. It is very important to them.

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 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. It is a concern for the PSA that staff are working to outdated job descriptions and that employment decisions will be based on these outdated job descriptions. Members are also advising us that many new Job Descriptions are so generic that they do not identify/reflect what a role really does (e.g. Contact Centre Officer in CUH).They are also concerned about the impact of generic job descriptions on the accuracy of the job sizing outcomes given that the current job sizing methodology is no longer supported and is outdated.

Even a restructure can be "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 change process that involved a very high level of staff engagement, involvement and awareness, for example Data Hub / MSD 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.

Make permanent appointments
There are many roles across Work and Income, Seniors, Students and Integrity Services that are currently filled by people acting, on secondment or on a fixed term contract. Many of these 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.

Members from the smaller service lines are concerned that the satisfaction they have from doing a range of things will be lost
Many staff in the smaller services lines take a task, function or service from beginning to end. This provides them with a great deal of satisfaction. They are greatly concerned that over time this will be lost.

Some roles are being disestablished but other people only need to be reconfirmed but 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 would like to recommend that the Ministry does a full account before they make a decision so they can clearly articulate with members and staff there 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.

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.

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.

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.

STUDENTS: SPECIFIC FEEDBACK

First, the members are concerned that they are losing two levels of management and support; the General Manager and three National Managers. These are the people who have pushed for progress at StudyLink (through consecutive managers). They have the big discussions with the Ministry, other Government departments, and student's union and education providers.

They understand StudyLink inside out. StudyLink has been a success, leading the way with online services and continually improving client satisfaction and speed of work. We are concerned that, without the dedicated management, we will slip back and not be a priority with Work and Income.

While we understand the reasons for the proposal to realign positions we do not support the proposal for the following reasons:

We believe the proposal does not address the following issues:

- There is a distinct lack of career opportunities. The role of an SLO (StudyLink Officer) ends with the SLO position and has no available path to progress. The only option for advancement is to transfer to a different service line which means retraining and beginning with less experience than other MSD staff in that service line.

- How will the Contact Centre operate and interact with StudyLink staff. Presently appointment management is dealt with by our team coach and contact is made with them if appointments are lacking in the region. Dissolution of these roles means the Contact Centre will need to reinvent how they work.

- Individual Work and Income sites only focus on clients within a particular area, where StudyLink's "boundaries" are much wider. Some areas of New Zealand do not have StudyLink offices and are dealt with by other regions. Who will be responsible for these areas?

- External stakeholders, their training, the future planning for peak seasons, summer school and second semester. This is all managed at a higher level than any one SLO can manage locally. It is currently managed regionally.

- Disestablishment of Study Links' Team Leader and Outreach Management positions mean their specialist knowledge will be lost if no appointments are made at Service Centre management level. There will be lack of expertise within current Work and Income management to deliver Peak Season planning, assist outreach staff with student related matters, relationship management at high level Stakeholder meetings.

- Additional Workload stress for already stretched Service Centre management
- Staffing based on workload from StudyLink contact/call centre may not be accurate as Outreach Officers are taking calls.

- Concerns with training modules and up skilling if the role of SLO is going to be interchangeable with Work and Income roles.

- Work and Income trainers at Regional Level are not skilled in StudyLink processes/applications.

- Budget allocation. Will it differ from the way it works now and if so how? Temps in StudyLink – will Work and Income staff replace these arrangements if budgets are changed?

- How will workload pressures be measured?
- Our need to re-establish pro-active interactions/presentations with schools and interest groups to promote an understanding of student services

We believe the proposal only partially considers:

- Our strength as a team relies on proximity. If our staff are relocated to separate offices there will be a wide range of skills over a wide range of offices and students with multiple needs may need to travel to different offices to receive the best service. This is not a client centric approach and will be detrimental to the business.

- We are able to overcome knowledge barriers by being able to share our skills locally. This is not possible if our staff numbers are reduced and this team was bought together by good leadership and management from the roles proposed to be dissolved. Removing these roles removes the heart of the team.

Alternate proposal

We are not able to comment on other business lines. They may or may not benefit from the change. We propose that StudyLink is looked at as an individual entity and maintains its current business model.

Further submissions forwarded from members:

Realignment Feedback – Dee Reynolds, StudyLink Training Developer

General Feedback

StudyLink has been at the forefront of on-line services within the Ministry. We have just turned 16 – we have a number of staff who have been at StudyLink since the beginning. The culture we've built is very much "can-do". Staff are encouraged to come up with ideas for improvement, we all feel engaged and want to continue the great work we do with students.

Creating an integrated service has been our main goal for the last half dozen years. Currently, everyone in Service Support provides the integrated service – processors and Outreach are able to take over inbound calls, phone staff and Outreach are able to assist with processing.

If the three units are split, how does this relationship work?

There was a lot of information provided in the Proposal for Consultation and not easy for me to get my head around the whole 58 pages plus the organisational charts. The presentation wasn't really helpful either as the presenters knew very little about what they were presenting.

I do appreciate the extra time that has been given for feedback, though. And have still managed to leave it until the last minute.

Redundancy

I understand from the proposal that there are nearly as many new positions as there are being disestablished. And redundancy is always very much a last resort. However, we have put our staff through so many restructures and changes – this is at least the 5th that I've been involved in one way or another in my capacity as PSA delegate.

If a staff member's position is being disestablished, and there is no real equivalent position, can we please look at redundancy?

This would solve the problem of us carrying disengaged staff who are no longer adding value to the Ministry. In some cases we have staff whose health and well-being have suffered considerably due to the 'force-fit' of their new position. We also have staff who are just putting in the minimum effort, and are quite open about this when speaking with their PSA delegates.

Changes to StudyLink Training and Recruitment Team – my team

What I support

To me, it makes logical sense that Training Developers work under the aegis of the Learning and Capability Development team. We need to be sharing resources and expertise (which we do in SSIS to a certain degree but currently this is based more on our relationships with the other training teams than anything formal).

I look forward to the opportunity to have an earlier understanding of changes in all units and being able to identify if there will be impacts on StudyLink – we often feel as if we've been left out of the loop and that National Office don't realise how changes may affect StudyLink products. I'm also interested in having more knowledge and experience in the Qualifications area.

Sharing resources, including staff, makes sense both fiscally and for personal development and group development.

What I believe the proposal doesn't address/partially considers

I understand how difficult it is to propose such a major change and to cover so many roles. However, reading the consultation organisational charts, it feels as if positions have been moved into pillars by position title or position description without actually understanding the differences in the work that we do.

The work that we do at StudyLink is seasonal. We know that there are specific times of the year when we have to have all training packages ready for summer season training and in the influx of temporary MSD contractors, when we have to be ready for SAL and eServices System Releases. We are flat out all year updating material or writing new material, but it's different work at different times.

We work closely with the three units to ensure we are covering all aspects of service; frontline, phone and processing. We are involved with Service Development from the beginning of any systems related projects so that we have a real understanding of how it will affect the systems, the staff and our students.

I have real concerns about how this will be managed in the future. StudyLink has a unique culture and proven work practices. We don't want to lose this. Training Developers need to be involved, and StudyLink needs to have Training Developers dedicated to this.

The proposal is to align StudyLink Training Developers with similar roles. Are there similar roles for us to be linked to?

It's also difficult to give considered feedback when we don't know the details. It would have been good to be involved in discussions prior to the proposal coming out to staff –

- Who was consulted?
- Do they really understand the job I do?
- Do they realise the networks and connections involved in my daily work?

What I suggest would work better

The proposal appears to downgrade the position of Manager Training and Recruitment by removing the responsibility for Training Developers and moving the role to the Student Support Centre with responsibility for training co-ordination and managing site trainers.

Manager Training and Recruitment has a different skill set to that needed to manage the three SSC trainers. The Training Developers are self-managing and although they require direction and feedback (as does anyone) they do not need the hands-on management that the SSC trainers require. They are required to fully understand any changes and have the ability to create 'fit for purpose' training material. And they do need the close working relationships with Service Development.

Unit trainers are required to understand the training material well enough to deliver it and to answer staff questions.

I feel very strongly that it would be more logical to retain the Manager Training and Recruitment as a National Office role with responsibility for Training Developers **and** for site trainers.

This would enable StudyLink Training and Recruitment to

- be managed from National Office
- be able to retain the unique relationships with all units including Service Development
- continue providing the integrated service we do so well
- provide Training Developers and site trainers with a training manager who understands the summer/winter seasonal nature of StudyLink's work

Currently, StudyLink is in the final stages of recruiting about 150 temporary staff (on MSD contracts for the summer season). In the proposal, the Training and Recruitment manager would be responsible for recruiting in Palmerston North for the Student Support Centre. How is it proposed that recruitment will be done for the Contact Centre?

StudyLink recruitment has worked closely with Work and Income Work Brokers to ensure we get the right staff at the right time. In just two seasons we have managed to create an amazingly effect working relationship. Let's not lose it.

What I don't understand

I've looked at the position descriptions for both Training Co-ordinator and Curriculum Manager and am having difficulty working out what the differences are in these roles.

Other Areas of StudyLink

My main concern is the layer of management that is proposed to be removed. The National Manager Service Development in particular has made such a difference to StudyLink over two summer seasons, has ensured that we continue to improve our integrated service and has seen an increase in our client satisfaction. I don't understand why this role would be disestablished.

I know that StudyLink Outreach and our Service Development team have provided their own feedback to you. However, I have a couple of comments as well.

Online and Infrastructure

Currently our Project Managers and Business Analysts have a National Manager to speak for them to ensure that the work they need to do is acknowledged and funded. Any major changes from Budget Initiatives require extra funding. Who will be responsible for ensuring that the funding is provided and that the importance of StudyLink changes are valued – not lost in the vastness of Work and Income?

These staff currently manage StudyLink's relationships with Fronde and IT Business Applications with SAL, UCVII, MSL, etc., updates. These need to be taken into account with the realignment.

What will happen with all the relationships we've built up with external stakeholders like the Big Eight education providers and students' associations?

Outreach

Outreach are losing not just their National Manager but also their Service Managers and Team Co-ordinators. As Outreach offices are nearly all co-located with Work and Income, it's logical that they come under their direction. However, it's even more logical that the Service Managers would just move sideways into a similar role with Work and Income. Outreach officers work is similar in a lot of respects to a Work and Income case manager – but has so much more.

Who will be arranging the expos, school visits, etc., which are currently part of the Outreach role?

Online and Infrastructure

Currently our Project Managers and BAs have a National Manager to speak for them to ensure that the work they need to do is acknowledged and funded. Who will be in their corner with the restructure?

Who will be managing the relationships with Fronde and IT Business Aps with SAL, UCVII, MSL, etc., updates? What will happen to relationships we've built up with the Big Eight education providers and students' association?

Outreach

This is another area where the level of management who has kept StudyLink Outreach on track are being removed from the structure.

Members are asking why Service Managers are not directly moved to ASCM status and still responsible for StudyLink staff. Who is going to arrange the expos, school visits, etc., which are currently part of the Outreach role?

Outreach staff have forwarded their own comprehensive feedback already.

Training and Recruitment

Training have always worked closely with the Project Managers and Business Analysts on SAL enhancements, SAL and eServices releases, AGA, Budget initiatives, etc. How will these relationships work under the new structure?

It makes logical sense that Training Developers work under the aegis of the Learning and Development team. We need to be sharing resources and expertise (which we do in SSIS to a certain degree but currently this is based more on our relationships with the other training teams than anything formal). This would also, possibly, give wider opportunities for Developers to increase their own knowledge and experience.

However, the work that we do at StudyLink is cyclical – we are flat out the whole time updating material or writing new material but the work we do differs depending on the time of year. We work closely with the three units. If the three units are split, how does this relationship work? We've worked hard to incorporate training so that 'one size fits most'.

- What will happen to our integrated service? Currently everyone is helping out on the phones and processing as required. Will this overlap continue?

- When new material is written/training is required that applies to StudyLink – do we have to liaise with three different groups? Or will each 'pillar' belong to a different Developer?
- Why is the Training and Recruitment manager role being downgraded to just the SSC?
- Would it not make better business sense to retain the Training and Recruitment manager role but have them report to Learning and Development?
- It feels like the working group have looked at position descriptions but not actually talked to the people who do the work or the people who manage the people who do the work – people with the same job titles don't necessarily do the same work or have the same responsibilities.
- Who will be in charge of recruitment for CC summer staff?

Training and Recruitment manager has a different skill set to that needed to manage the three SSC trainers. The Training Developers are self-managing and although they require direction and feedback (as does anyone) they do not need the hands-on management that the SSC trainers require.

Further areas of concern

Staff across Outreach have proposed a number of operational concerns and although the logistics haven't been work out yet and it's easy to say that's just operational and can be managed, we believe that these need to be considered before any proposal is singed off, as these will have a huge impact on the way StudyLink Outreach delivers service to clients.

By taking away the StudyLink Outreach management structure and reporting lines you are taking away the support that staff need daily and putting a lot of that work on to Work and Income managers that already have a large work load and may not be equipped with the ability to support the staff and clients who need it. How can you effectively manage the operational aspect if you don't have a greater understanding of what we do?

Our work is peak orientated and for many years we have driven the focus and put the responsibly on to the student during our off peak times by going to them with Sussed which was removed as a service from 2014. Material that was to be sent to schools, which hasn't been delivered when it was promised, and possibly not passed on to the students when they needed it.

School careers advisors have expressed that they don't feel comfortable answering questions posed by their students especially when they are so ill-equipped to do so.
It is entirely likely that a large number if first time school leavers have little to no knowledge of how to fund and how to manage their student finances. We believe that by the time we identify these student's it will be well into the 2015 study year and there will be an increase of students needing help at this time. This will cause an increase of foot traffic to sites, contact centre calls, Student Allowance and Loan applications, applications for assistance with payments for halls of residence, rent arrears and applications for other financial assistance because these students simply don't know what they are entitled to or how to go about it.

StudyLink Outreach staff would like to invite Work and Income managers to spend some time with us now, learn what it is that StudyLink staff do every day and be well prepared for impact we will have on their workload so that they are ready to work with us to best serve the needs of our clients.

Culture Change

StudyLink Outreach and StudyLink as a whole have been modelling the "blue" culture for many years.

StudyLink Outreach culture is based on macro-management, rather than micromanagement. Outreach Leadership team have encouraged staff to contribute to strategies, to ensure that they are driven, owned and worked by the staff that will deliver the service. In turn you will find that staff has a loyalty and passion for the StudyLink brand

This culture is modelled by every level of the Leadership team of Outreach. This is partly based on how we recruit; we hire the attitude and train the skill. This has been reflected in our ability to have returnees wanting to come back and work for us in the peak season.

The proposed changes are not reflective of the Blue Culture for the following reason

- It is evident that there is a lack of understanding in regards what Outreach does
- Because Outreach have front facing services, that we are like Work and Income case managers

The proposal in its entirety has reflected the lack of knowledge of the operation processes for the staff. It has "punished" staff because they have done their Job and done it well. Though not the intention of the proposal, this is how it has been perceived from the floor, and is a consistent message heard throughout the regions

The one MSD approach is where we should all be heading as this would benefit the people that walk through the doors every day. The concept is based on the Durham street model, which is currently being trailed, this works, hence why the proposal/consultation has logical business sense; however the proposal does not reflect this. The proposal is reflected as a merger rather than realignment.

StudyLink Outreach are currently part of the one MSD trial site, and have advised part of the reason it has been successful is due to the fact that the reporting line in management structure is still in place for the site. There is no ambiguity in regards to who the staff reports to. There is therefore a respect for the work that each respective unit completes and no confusion regardless of the differing process that are in place.

MSD encourage staff that, we cannot use a one size fits all approach with our clients, however this is contradicted in the proposal by stripping StudyLink Outreach of their identity, and taking a one size fits all approach with their staff and services units.

Whilst combining services to make it more convenient for our client base, using the client centric model and working in a more collaborative approach with our clients, makes strong business sense. And is the way going forward. The same results can be achieved, without having to strip the identity of StudyLink Outreach.

You can put staff in the same building, but this does not mean that collaboration would happen naturally and will depend on who leads staff through the collaboration. Staff need to value the work that they do, in order to value the work of others.

Questions from Staff:
Job description and potential changes

- Managers sign off – for products like Limited Full Time, Independent Circumstances Allowance, etc. Staff and managers signing off decisions must have policy and legislation knowledge. Will the Work and Income managers be learning this on top of what they are already expected to know or should we be going through to the Student Support Centre for sign off or for the processing of these products?
- If so what support is in place at the Student Support Centre for the increase in Outreach needs?
- We use Student Allowance legislation as well as the Social Security act daily. The Student Allowance legislation is significantly different and a lot of the time Work and income don't realise that there are restrictions to students between the two acts. How will this be managed if the Outreach leaders are no longer able to?
- Due to the staff being specialised in student products, will this impede the "Blue" Culture amongst the wider team in the service centre, due to the differing roles and differing distribution of workloads?
- How will Service Managers/ASCM be equipped to handle this, when they themselves are Work and Income managers (loyal to the brand) not yet MSD Managers?
- What will be the transition process for OR staff and what support will be in place?
- How will this be communicated and worked through with current TC and CROM
- Integrated Service: Support offered by Outreach to SSC and CC are allocated on a daily basis. Will OR staff be expected to provide this support? Potential risk during peak season
- Quality – how is this going to work for us? Who is going to do this and how will it be feedback? Work and Income staff can't check our work if they don't know their way through SAL or have the product knowledge to be able to do so.
- Staff will be "lifted and shifted" under the current Work and Income Structure, will managers be equipped to operationally manage the staff.
- Will our job descriptions change?
- Will staff be required to complete case manager's duties, even though they will remain under current Job Description?
- FOH function for Outreach will then need to be picked up by W & I reception, which may not to be able to manage the student enquiries.
- Will staff be still be expected to contribute to the wider teams work streams? E.g. Processing and Contact centre or will staff be required to assist with the site needs first? E.g. picking up Work and Income walk in client's
- Has consideration be put into staff's current capabilities to process benefits?

Training

- Who is going to be delivering this and creating the training material – all of the training material that is developed always needs to be adapted for Outreach.
- We know that there is to be an overhaul of systems technology with the simplification project but that isn't to take effect for some time and Work and income currently have no knowledge of SAL, KBase, TEC, let alone the ability to offer any significant training, who will

be responsible for training new or up skilling current StudyLink staff, delivering SAL release training, supporting changes with EP's, etc.?

- StudyLink Team Coordinators are the first port of call for staff with Policy, Legislative and operational processes if you take this support away will there be trained support put in place for Outreach staff if so who?
- Will Helpline be trained to manage StudyLink Enquires for Outreach staff?
- How will training, specific to StudyLink products be communicated/trained to StudyLink staff based on W&I Sites?
- How will Wednesday brief look? Currently it is very Work and Income focused and even changes that do impact on students often don't get feed down to StudyLink e.g. Changes to TTW.
- Will SCM/ASCM have the ability to support Policy/Legislation, SARH/ROD, Support for complex student situations, and Management of external stakeholders?
- Will Work and income SCM/ASCM's be trained on the SARH process vs. BRC process and the key differences that exist?
- As our product is significantly different who will pick up any queries for MP's offices?
- If you do choose to transition StudyLink Officers into "MSD Case Managers" what would the transitional period be and what training would we get considering StudyLink' s current peak seasons don't allow for a lot of training opportunities?

Performance

- What will be the KPI's for staff?
- How will KPI's be monitored?
- StudyLink's current PDA period is October to September how will our new Managers/Roles and alignment be impacted with StudyLink changing in April to come under the Regional Structure.
- PDA – who will be doing these for us now? How will our performance be measured now?
- Authentication – How is this going to work for us? Still using STP?

Stakeholders

- Who will be responsible for Education provider management?
  Who is going to account manage these, deliver training, order collateral, attend open days and Expos, who will confirm and allocate our attendance and capacity?
- Will Education Providers still have their local liaisons and opportunities for staff to work with them when they need face to face or specific contact?
- What is the stakeholder engagement plan regionally and national?
- We are moving to a client centric model will we be going back to relationship management with EPs, delivering to schools again like Sussed?
- Sussed is no longer a product that StudyLink offers and schools were to be sent material that has been delayed significantly and in turn possibly not delivered to students, Careers advisors have requested that we go back out to schools and talk to the year 13's. Many StudyLink Officers believe that because this service has been taken away from schools there will be an increase in first time students that don't know what to do when it comes to applying and managing their student finances, an increase in applications during first semester, increase in bond/payment assistance for halls of residence which isn't covered by StudyLink. Who will manage the impact of this?

Teams and Staffing

- Will the current teams be split up and placed at regional W&I sites?
- If teams are split, there could be a disproportionate spread of students' dependant on the sites where they are located.
- Splitting teams would then have an impact on the knowledge and support these staff currently shares with each other.
- Is there also the possibility that staff would be split up to cover a larger region e.g. Christchurch, Wellington and Auckland? Is this in the hands of the Regional Director or Commissioner meaning each region may have a different operating process?
- StudyLink currently has a number of Remote sites what would that mean for them BAU or increased travel to cover sites that don't currently have StudyLink site presence? Co-location where we cover the BOP which site would we sit, will the service remain the same i.e. changing our site daily?
- Would we still have campus presence or on-going site presence? E.g. on Campus at Otago University during Orientation week, Aoraki Polytechnic during their first week, Thursday and Friday Wellington staff go to Lower Hutt and Porirua service centres.
- Currently if any staff leave Outreach their position is filled in that region with the greatest need what will the proposed changed mean for Outreach if we are to come under the Work and Income region structure.
- As StudyLink' s peak season falls over the summer and Christmas period there is currently a restriction on leave for this time. How will this be administered? E.g. StudyLink Offers come under the W & I CM team? Or will there still be National StudyLink 10% restriction in place?
- How will our appointments be booked will we still use and manage an Outlook Calendar or shift to ABT? And with that in mind who will manage our calendars?

- Supports for outreach staff re: everything StudyLink – because work and income don't know much about SAL, kbase, TEC, everything to do with education! Is there going to be a point of contact for us, who is this and how is this going to work?
- Are our roles going to change after 31/3/14 i.e. from StudyLink officers to specialist case managers etc. – are we going to be reabsorbed and forgotten about?
- Client-centric model, does this also mean we will be able to account manage? Go to high schools? – What is that going to look like post 31/3/14? (I would like more information)
- Is SAL going to be 'exterminated!!' and what will be in its place – integration of technology – who, when and what?
- What happens to our outreach peeps – where are they going to be situated (i.e.: one at every work and income office?), what about remotes – so do I spend 4 days a week travelling to the different work and income sites in my region (Wairoa to Te Araroa)? How is this going to work?

Concerns:

- We would have preferred more in depth analysis and commentary of the information as it is difficult to understand.

- Concern that there will be a lack of communication between management pillars for each of the services e.g.: contact centres/face to face

- Disestablishment of StudyLink Team Leader and Outreach Management positions and their specialist knowledge will be lost if no appointments are made at Service Centre management level. There will be lack of expertise within current Work and Income management to deliver Peak Season planning, assist outreach staff with student related matters, relationship management at high level Stakeholder meetings
- Additional Workload stress for already stretched Service Centre management
- Staffing based on workload from StudyLink contact/call centre may not be accurate as Outreach Officers are taking calls.
- Concern over training modules and upskilling if staff are to be interchangeable in Work and Income.
- Work and Income trainers at Regional Level not skilled in StudyLink processes/applications
- Budget allocations for temps in StudyLink – will Work and Income staff replace these arrangements
- How will workload pressures be measured?
- Career opportunities lost for Student Services staff in the regions

  Re-establish pro-active interactions/presentations with schools and interest groups to promote an understanding of student services.

Reinforcing the comments made by our membership at Northern Outreach:

- Challenges of integrating two different service lines.
- One of the proposed changes that we would like to voice our concerns is with the disestablishment of the Outreach Manager and Team Coordinator roles. With the proposed disestablishment of these roles, we strongly believe that we will be losing much needed expert support which we utilise highly on a day to day basis. The main function for Outreach is to provide a face to face service to students to help them make informed choices regarding their finances while in study, but this is the only service we provide.
- Here at Northern Outreach, we interact with education providers and stakeholders, attend various expos, administer hardship assistance and resolve complex issues by processing Student Allowance, Student Loan and Extra Help applications on site. We also co-ordinate and conduct Student Allowance and Benefit Reviews. While on the surface it may seem similar to the role of a Work and Income Case Manager our services are tailored specifically for students and as StudyLink Officers we feel that we would be more efficient at doing our job with the support that an experienced Team Coordinator and Outreach Manager provides us day after day.

- While we support the change that requires us as StudyLink Officers reporting to the Auckland Region, we believe that there needs to be someone at a site level who has experience in StudyLink Policies and systems to be available when we need assistance and support on frontline.
- Concerns regarding losing a strong support and knowledge base.
- As a collective, there have been concerns raised around the extent of support that Work and Income Service Centre Managers will be able to provide to StudyLink Officers as most SCMs will not have the product and system knowledge and experience that our Team Coordinators and Outreach Managers have.
- The system used to administer StudyLink products (i.e. Student Allowance and Student Loan) is not the same as what Work and Income utilises. Service Centre Managers and Service Centre Trainers are not sufficiently trained to handle complex queries that StudyLink Officers encounter daily. Team Coordinators are able to efficiently handle these queries and solve any difficult issues that StudyLink Officers may come across. We are concerned about not having this on site as we rely on this support to ensure that we give the best possible outcome for our students.
- Concerns regarding loss of established rapport with management.
- As a team and individuals we each have a good working relationship with our Managers. Staff have been asking whether or not operational issues raised by StudyLink Officers to SCM's will be dealt with the same efficiency as raising it with Outreach Managers who have in depth experience with what we do here at Outreach and have a good rapport with all the staff that they manage. We as StudyLink Officers feel that any issues we may raise regarding our duties would be best handled by someone who has an understanding of what we do on

Proposed reporting line structure:

- Concerns regarding how staff will be structured at a site level
- As there has been no information given in the proposal of where StudyLink Officers will be based, staff have strongly emphasised their opinions and believe that we should retain the method we presently employ which have StudyLink Officers going out to satellite sites and reporting to a central site. Here at Northern Outreach we function extremely well as a team and complete high volumes of work to exceptionally high standards. Individually, we all have different areas of expertise and are at different skill levels but we use this to our advantage to share our ideas with each other to achieve the high quality work .This has helped us to achieve better results and to resolve issues before they cause hardship for our Students.

- Staff would like to know what the proposed structure will look like and operate at a site level as currently we have no confirmation on how these operational processes will be carried out and how this will make us as StudyLink Officers perform more efficiently. Staff have also commented that as a business unit, StudyLink did exceptionally well last peak period and have raised concerns on whether or not the new structure will negatively impact on the progress that we have managed to achieve. Staff are querying if this new structure is necessary for us to improve our services. Several staff members have also submitted queries regarding how Student Allowance Reviews will be organised as they usually require Outreach managers and Team Coordinators to be present.

- Stakeholder and Education Provider relationship management and commitments to special portfolios (i.e. KATTI)

- As previously mentioned, Northern Outreach is also responsible for maintaining relationships with various stakeholders and education providers. We often get requests from Education providers for StudyLink Officers to attend at their career nights and expos. This approach has been valuable to Education Providers who deal with students and their queries regarding financial help while studying. This helps to ensure that students are getting the correct messaging and are equipped with the full knowledge of what they are entitled to and are able to make informed decisions regarding their finances.

- Kei ä Tätou te Ihi or KATTI is a series of programmes aimed at secondary students in years 10 to 13 of Maori descent. The programmes are a collaborative approach between Auckland-based tertiary institutions and other relevant agencies. StudyLink has a crucial role in supporting the directive of the programme which is to ensure that programme participants are well informed at the various stages of their education. With the changes of structure and reporting lines, we at Northern Outreach are concerned about how these relationships will be maintained. StudyLink has been involved with KAATI for 11 years to date and we believe that it is a programme that is valuable to the community.

- The proposal put 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.
- Reporting line change is not minor, grouping of work within a reporting line might silo the prioritisation of resourcing.
- Will work still be topped up with work from the SSC (Study Link Service Centre)?
- How will SCM's in smaller centres link in with the coordination of work?
- The Team who do the 6 monthly rotation with IRD, where do they sit in the new structure?
- How can you integrate the managers Study link into the Services Centre Managers role without significantly increasing the size of the role.
- The view of members is that in the short to medium term lifting and slotting Study Link won't work. A further phase medium to long term further work needs to be done to plan for integration to occur in a way that mitigates those risks, members do not want to lose the efficiencies they have already gained.

SENIORS: SPECIFIC FEEDBACK

The following comment has been reflected in most of the feedback from the members within Seniors around the country:

"Our main concern is that we appear to be losing all the gains that have been made in the last 4 years. Regular and very helpful coaching, training and feedback".

Also, a number question around the practicalities of the job:

How will our queues of work be managed – current system very good, work and income system – not so good? Who will cover for leave in sole sites are just a few that we can quickly think of.

Services for our Senior clients have improved greatly since operating as a separate national team.

Historical concerns that there is already not enough time to process on top of face to face appointments therefore some gets missed. Relationship development between client and Case Manager is critical.

To reinforce the views of our Christchurch members:
Due to New Zealand's aging population, the Senior Services client base will increase dramatically in the coming years, and our service delivery and development needs to remain in focus.

- We are concerned that when Senior Services merges with Work and Income, this focus will diminish.
- The very nature of our service lines reveals fundamental differences. Both Work and Income and Senior Services provide care and support for clients for the duration of their need, however unlike Work and Income, Senior Services provide a long term service which generally ends when our clients pass away, and no sooner.
- Both service lines work with other agencies to provide services for their clients, however again the motive for inter-agency engagement differs. Work and Income utilise agencies to assist clients to become better educated and motivated to make positive changes and choices for themselves.
- Senior Services engages with agencies to build a community and society that addresses the issues that face our aging population, and adapts to meet their changing needs. It is with these differences in mind, that we give our perspective on the proposed realignment of our service with Work and Income.

Concerns at a national level:

- Online applications and over the phone SNG applications have been oversold. Frontline staffs receive on-going feedback from clients confirming the online services available fail to meet their needs (poor online application formats, clients own lack of IT experience, etc.). We recognise this will change in the future as clients become more IT savvy, however are National Office relying on online services to fulfil too much too soon?
- National Email Inbox and Web forms – currently managed independently in each region. Who will manage these when service lines merge?
- National Office advisory e.g. legal – what will their role be? In the last few months, we have experienced reluctance from Legal to provide a legal viewpoint on cases involving senior clients, instead suggesting we approach Policy (who cannot always give the appropriate advice). If we don't have clear pathways for support nationally, and are separated in sites, how are Seniors CMs meant to function in their frontline role?
- Seniors Training – what is the framework? Who will oversee on-going training and development of staff? Will Work and Income trainers have expertise in Senior's case management?
- Concerns that by reporting to a Work and Income SCM, that we will be seen as W&I CMs, with the expectations of that role (majority vs. minority).
- Service Express Interviews for NZS applicants – what future does this have? Currently applications that fit the criteria are processed by Study link. If it continues, how will it be resourced?
- Scanning of inwards, schedules, appointment bookings, etc. – will scanning continue to be managed nationally, or will it be absorbed by individual Service Centre's? Who will be

responsible for processing of tasks? Will schedules for NZS appointment differ from site to site? Who will decide on the number of appointments per site, etc.?

- What happens to the Senior Services brand? What will the impact on clients be at frontline? Will they no longer have separate waiting areas? Will they be bulk booked, and expected to wait to be picked up for interviewing (like W&I clients)? What will the impact be on the community's expectations of Senior Services (i.e. a possible perception of withdrawal of services to senior clients)? How will we (or will we) continue to engage in Community Projects (i.e. Hoarding Initiative with Age Concern)?
- BRCs –will they still be nationally managed?
- Contact Centre's – will SSC and W&I Call Centre's merge? If there is a reduction CSRs, there will be longer call wait times, misinformation given and calendars mismanaged (currently the SSC is an important mechanism within Senior Services)
- Management of Work Queues and Workload – no apparent coordinated role outlined in proposal?
- Will we lose the national focus on Senior Services – delivery and development? Without leadership, who will ensure this does not decline?

Concerns at a regional level:

As a centralised city our unit has performed efficiently, both with staff and workload. Currently performing extremely well and consistently meeting our KPIs, and client satisfaction survey results show our service is meeting client expectations. We have the following concerns/questions regarding this merger at a regional level:

- What about Rangiora, Kaiapoi and Ashburton staff/sites? They are not mentioned in the proposal we have received.
- Out Reach roles covers the wider Canterbury area – community expectation now exists due to the relationships that have been built, and the service delivery model for rural clients that has been operating. What happens to this service now? How are our rural clients going to be impacted?

Concerns at a local level:

Christchurch Super Metro currently work alongside W&I staff in Service Centre's, Linwood Community Link, Hornby Heartlands and NZ Government Sydenham. We have good working relationships with our W&I counterparts, and though our client base and service delivery differ, we do consider ourselves to be 'one MSD'. The concerns we have in merging at a local level are:

- Site placement and position – who will approve placement of CMs in specific sites and replacement of staff when they leave? For example, when one of our CMs currently on secondment returns to her role, who will she be engaging with to negotiate this?
- What about our specialised CMs - Ken (Community Rep) and Pam (2IC and Team Training) – where will they be positioned and what will their roles be going forward? Where do they fit in the proposal?
- PD Performance Assessments – will our roles KPIs and expectations change? Senior Services CMs should not be disadvantaged by having W&I KPIs applied to them, when the objectives and expected outcomes differ greatly from the Senior Services focus.
- If still processing nationally, what happens when problems arise with tasks that require them to be returned to the original processor? Currently we refer such tasks back to our LSM, who in turn forwards the task to the original CMs LSM – this ensures fairness and allows LSMs to recognise when CMs may need more training and support.
- Flexibility in processing workload – both locally in Christchurch and nationally, Senior Services teams currently provide good support to each other. If one area is under pressure or has capacity to take more work, the workload is adjusted to ensure fair distribution. Who will manage this if Senior Services merge with Work and Income?

- Relief for staff – annual leave and sick leave is currently managed in our area, by CMs moving between offices to provide cover as required. If we fragment and report to individual sites, how will SCMs manage cover for planned and unplanned leave, considering the number of Seniors CM in relation to the size of our client base (i.e. 16 current CMs servicing all of Christchurch and surrounding rural communities)? If Seniors CMs are designated to specific sites, will there be room to float between Services Centre's when required, to ensure clients are not impacted by staff absence?

Concerns at a personal level:

We were not only appointed to Senior Services roles, we chose to work in this service delivery field. We have concerns that Senior Services will be swallowed by Work and Income, and our roles and service to clients will be negatively impacted.

- Self-development and training opportunities – concern that if we merge with W&I we will not be given opportunities to train and up skill, especially in areas that relate to senior clients (may not be recognised as important or relating to our role within W&I).
- Concern that as representatives in W&I Service Centre's, we will be the minority - our roles may not be given the same respect and value as our existing W&I counterparts.
- Concern for clients if Case Manager roles become generic – we are in no way trained or competent in current service delivery for working aged client's, and assume that W&I CMs would feel much the same if they were expected to provide service delivery to senior clients. We worry that higher management believe our roles are interchangeable, when in fact they are not. The crucial skills for each role come with proper training, support and experience and without these; both staff and our clients will suffer as a result.
- Agreements already made with our LSM prior to him entering his secondment – some CMs have concerns that the annual leave already approved up to and after the Christmas 2014 holiday period will not be honoured come December 1st 2014. Will leave arrangements already approved, be accepted and honoured by the SCM we individually report to, once service lines have merged?
- Contracts – will existing contracts be honoured and upheld? We have members of Christchurch Metro Super who are contracted to work part time, and fulltime staff that work with reduced hours (i.e. four days per week) which was agreed to by our LSM. Once we merge with W&I, we expect these contracts to continue without changes. Does this mean that W&I will manage the Senior Services presence in each of their sites, with respect and acknowledgement of the contracts each Seniors CM already held with SSIS?

Conclusion:

We acknowledge the current realignment proposal only extends down to LSM level, in that the only change for CMs is in reporting lines, as outlined in the proposal document. However this reporting line change has significant long-term influence in terms of organisational culture, the service delivery style reflected in our client service and case manager roles.
Our feedback reflects the impact of this proposal from a case manager perspective and at case manager level. Our concerns are clearly expressed and given the proposed tight timeframe, these concerns are well-grounded given the recent tragic events in Ashburton, the many complex and pressing issues now facing the Ministry.
The coming months will undoubtedly bring much change to the face of Senior Services and service delivery across all service lines, and we would appreciate clear and direct communication from a National Level – please tell it like it is.

Further member feed-back:

- Because the SCM's have the responsibility of NZS CM's does not mean that this is LSM's were always available regardless of where they were in the country. If not, there was an organisational structure where anyone was available.
- LSM's based their decisions on signoff's in line with the policy, sensibly, CM decisions only, their decisions were not impaired based on the whanau / family history.
- Wednesday conferences: We all processed the same work, and talked the same talk during this time, a meeting of the minds. An inclusive team – solution focussed. Decisions suggested/ made and supported by all involved.
- Never felt isolated even the sole sites, there was always a work colleague/ training advisor/ expertise on tap
- This team, although very vocal just get down and do the job. They are all very experienced adults.

The proposal:

- It states that Senior CM are now under W&I SCM's.
- Having been present when this structure was in place a few years back. Wednesday briefs were structured around targets/ KPI's. The only time NZS was mentioned when there was a clip or Wed Brief from National office which was glazed over because no one else understood it.
- There will be a feeling of isolation – unless…based on reading between the lines, the SS CM will slowly be integrated into W&I and all staff will deliver this service. Now there will be all the valid reasons provided, I have heard that all before too and to be quite frank it goes in one ear and out the other.
- We have witnessed the Work and Income staff place themselves and their work colleagues at risk with arguments between each other, on the floor, emails. Something I don't wish to be a part of which is why the Senior Services team were very refreshing being awesome at processing, being supportive of each other. It is the first time I have experienced this in a very long time and the reason why I applied for the fulltime position.
- Just their focus.

We love working for Seniors separate from W&I because the Seniors team. There is a level of trust within the senior's team and the LSM. We have witnessed, for some bizarre reason SCM's seem to disclose everything/ anything to each other and anyone. The in-house gossip and belittling is horrific.

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

The key rational for change is to enable the Ministry to deliver better services for clients (page 9). Members working in Seniors strongly believe that the rationale to align functions is progressing at the expense of services to Seniors and key stakeholders such as Grey Power and Age Concern.

Senior clients are our largest client group (and will only get bigger). The proposed changes to Seniors nationally will impact on the Ministry's ability to serve the needs of older New Zealanders in the most appropriate way.

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 Seniors staff to effectively engage with community stakeholders.

INTEGRITY SERVICES: SPECIFIC FEEDBACK

NFIU

Is it moving forward or is it moving backwards?

- 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. Members would like the decision document to clearly detail how the proposed structure enables better fraud detection than what already exists.

Level of support to be aligned with Risk & Assurance:

- In 2009 a robust Business Case was submitted and approved by Justine AUTON, Simon FRASER and Hillary REYNOLDS. This business case clearly showed that the alignment of Fraud Investigation while attached to Work and Income was not working, did not address or lessen the fraud committed by beneficiaries, and did not bring to account those committing fraud at a serious level. It was an in-depth and well-conceived business plan that addressed the problems and gave a balanced and considered plan. This business plan was also welcomed by the Minister of the time.
- Since this 2009 plan was implemented, the National Fraud Investigation Unit has gone from strength to strength. The Investigators have become more professional and proficient, have received in-depth training in interview techniques, have become specialists in the ever changing area of legislative changes, and the standard of the fraud investigated has improved. The level of overpayments, and number prosecutions now carried out shows the Plan is working. The Unit is now respected by those inside and outside the business.
- There appears to be a real misconception as to who are the clients of the National Fraud Investigation Unit. Our clients are not Work and Income beneficiaries, but the Tax Payers of New Zealand. We protect the integrity of the payments made, investigate those committing fraud and bring them task, and give the Tax Payer confidence that their monies are being appropriately spent.
- There is also a misconception shown in the proposed changes as to the actual role of the Investigator. We are not a front-line trainer – they have their own trainers. We are not there to make a decision for the case-managers as to the eligibility of a client to benefit – that is the role of the Case Manager and their managers. The role of the Investigator is to investigate Benefit Fraud and bring the perpetrator to justice.
- The 2009 Plan clearly identified, that having an Investigator at front line, did not lessen fraud, and did not show any proven deterrent to the fraud committed by beneficiaries.
- Investigators currently do assist case Managers at Work and Income in a quietly discrete manner. It is also made clear to them that we will not do their jobs for them, and this allows them to grow within their own area of expertise, gain confidence with dealing with their clients, and after more training will become even more confident.

If the National Fraud Investigation Unit is re-aligned with Work and Income, it will have the following results:-

- Place more risk on Case Mangers where the Fraud Unit and Work and Income are seen as one and the same business model. At present we are a separate and independent Unit, where the Beneficiaries can clearly see as the people who help them; and the other people who will not put up with the fraud committed, and will prosecute them. They are less likely therefore to take out their frustrations and potentially worse behaviour towards the people who deal with them on a day to day basis – the Case Manager.
- Weaken the Fraud Investigation Unit's ability to investigate high end, high risk fraud.
- Weaken our image to the Tax Paying Public.
- Weaken the image to those that assist our investigations. The minute we became the National Fraud Investigation Unit, the co-operation of the general public and other stake-holders increased 100 fold.
- Weaken our image to the offending beneficiary recipients.
- Create a risk to Work and Income where fraud could be seen to be being condoned.
- Reduction in the number of support staff that are required to allow the Fraud process to be fully carried out.
- Reduction in funding whereas the current model is actually cost effective, i.e. we recover more money than it costs the unit to run.
- The perception of the Public will be that nothing is being done by those that administer the benefits to stop those who commit fraud. To say they would not be aware of this change is extremely naïve and dangerous to say the least.

<u>The National Fraud Investigation Unit needs to be aligned under RISK and ASSURANCE, with the necessary management systems in place.</u>

- Aligning Investigation Services with Regional Delivery does not make sense. NFIU clients are the NZ tax-payer, not Work and Income clients. The core business of an investigator is to investigate alleged benefit fraud and to maintain the integrity of the welfare system. NFIU are not charged with determining welfare entitlement that is the responsibility of front line W&I staff.
- It is a misconception that by locating an investigator at a W&I site that their presence will prevent welfare fraud. There is no evidence that this works. In fact there is no reputable evidence, from any enforcement agency, that any current prevention method works. Fraud mostly happens after a benefit is granted, and although the intervention of NFIU into a fraudster's behaviour may deter others to offend it does not prevent ongoing benefit fraud.
- NFIU do provide support to our colleagues in W&I; and can continue to do so, albeit in a discrete manner, while not part of the proposed realignment system. I would like to state however that NFIU can advise W&I, however any decision regarding entitlement ultimately lies with W&I. I do not see an investigator providing formal training services to front-line staff, this is the responsibility of W&I trainers after a training needs analysis has been undertaken.
- During 2009 a Fraud – Business Case was submitted and approved by Justine Auton, Simon Fraser and Hilary Reynolds. This sound business case formed the basis for the way NFIU are currently operating, and we became professional and successful.
- The business case noted that when Benefit Control was aligned with, or incorporated into Work and income:
- resources in regions were used for non-fraud work by managers
- lines of accountability were blurred as there was no dedicated fraud manager
- Regional managers managed cross functions so fraud was not a priority.

And so we changed………………

NFIU is currently part of Integrity Services providing a robust response that covers intelligence, policy and compliance, and should remain separate from the proposed pillar.

The current Ministry's direction for NFIU is to focus on the response to high end high risk fraud is being met. We do however also deal with straight forward working cases e.g. as a result of IRIS, and investigate some low risk cases to test our screening process.

Being realigned will:

- weaken NFIU's current strong position to deal with high end high risk fraud
- possibly lead to the diminishment of staff resources
- align NFIU with a group who have a different client base
- require unnecessary costly rebranding
- A softening of our image
- undermine the right amount of essential management and support roles (e.g. AO's, SO's IDT's) are available
- possibly lead to an incorrect number of investigators at various regions in comparison to high risk clients

The best and most sensible place for NFIU is to be aligned with RISK and ASSURANCE.

Responses from smaller regions led by Nelson:

- We have great concern over the loss of knowledge through removal of key individuals in NFIU. On the contrary the lack of knowledge in the Regional Office of the role is also of concern.
- For the Nelson region, it covers a vast geographical area. How will they manage the area and no. of cases if the collaboration with Christchurch Unit is lost? In addition, we will have lost the resource sharing in particular of support staff.
- Who has the specialised knowledge and expertise to train and manage new staff? We believe this to be the responsibility of the SFIA not Work and Income SCT or RT. The training of frontline Work and Income staff is also important but are Regional Trainers equipped with specialist knowledge for this?
- The loss of a specialist role is another concern. We do not share common basic principles with Work and Income like Seniors or Study Link do. NFIU needs such stand aside positioning in order to retain its sharp focus.
- There is mention of prevention but has this not always been the case? We do not usually see fraud on application for benefit and more work is needed with Work and Income in the prevention capacity. The former Field Officer roles proved very successful in prevention with great reporting. We believed that Work and Income was supposed to have covered this role but five years have passed with no formal intervention.
- The role of National Manager for Fraud is essential for consistency in liaising with Managers of Fraud Services and needs to be someone who has knowledge of fraud.

Members Concerns/Observations:

The number of technical officer's vs Investigators:

- We will no longer be working in hubs the techs will need to pick up a lot of work for some areas and this will not allow them any time for anything other than creating overpayments. As an example, in Porirua they have 1 tech for 8 investigators. To work effectively and more so in the preventative role, they would need to have 1 tech to 4 investigators. The numbers shown in the proposal do not reflect this.
- We appreciate that our basic structure has been left as it was, which is reassuring to most of us working at the coal face, however we do have concerns that there will be no one to offer

training to investigators and technical officers where they are new or a change has been made that everyone needs to learn. This may fall to the Quality Assurance Officer (who does some of this now, it is true) and/or other technical officers and investigators who are barely able to cope with the work crossing their desks, let alone training new and inexperienced staff, or who are barely given time to grasp any changes before they will be having to teach others.

- Our Senior Fraud Investigation Advisors have offered a comprehensive service with this in addition to other functions like advice on a case which was proving difficult or on where to go next, when the Operations Manager has other work to focus on. Audits need to be completed to ensure the quality of work and ensure that performance appraisals reflect staff ability and function adequately. This additional work being heaped onto the managers does not seem to advantage the clients who may have to wait longer for outcomes on investigation cases.
- While we can appreciate that the low to medium work flow should be managed away from the hard-core fraud our units are styled to look at, a number of us have been working recently in this area and the work feels endless. We have 3000 unassigned cases in the low to medium area, many of which are sitting near to the high end, with detailed information that suggests fraud is indeed being perpetrated. At one point, this type of case would have been thoroughly investigated. Currently, we often send a letter and ask the client to confirm or deny the allegation without any proof one way or another. We will then clear the case because they have denied any wrong-doing, despite indicators to the opposite, unless there are compelling reasons to look further.
- While this does address the significant numbers as quickly as possible, it is hardly a satisfactory way of working. In other cases, these high-end medium cases are escalated to the investigators, adding to their already large workload.
- Therefore it appears the placing of the top end of medium cases is too high, and some of these should revert to the fraud unit, which would give investigators additional work they barely need due to the already large numbers of high end fraud we deal with. More staff are needed to work through this issue, (although I can see this is unlikely).
- We believe the issue of prevention is also significant and it is good to see that this will be something the Ministry intends to address. However, without substantial input from our current senior advisors, it’s hard to see how the investigators and technical staff will have time for anything expected of them in this area on top of dealing with the current workload and any additional medium work that is shifted to high end.
- Any shift in our focus should strongly involve front end Work & Income staff – prevention should be part of their brief as they are the ones who see clients first. Harder questions should be asked; more proof of such things as accommodation costs and addresses should be followed up on properly, not just left to the whims of another person seeing the client later when someone does not provide requested information immediately; and NO grants of supplementary services should be given until this proof has been obtained. This type of process would help stop fraud before it starts, which may aid in decreasing the allegations that need some of the more thorough investigations.
- Finally, once things settle and decisions are being made about where our units physically sit, we hope that we will remain in our current group/location (not necessarily the same building) so that we can continue the work we do with the support we all need. To split the Fraud Units and have individual team members sitting, for instance, in Work & Income

offices instead of together would make our functions very difficult to perform. It is because we are a closely connected team that we work successfully, and while being part of the wider W & I and MSD team is important too, we have important and necessary functions and knowledge to share with each other that would be more difficult to achieve if we were physically separated. This is not to say that investigators should not spend time in W & I offices; I believe a presence in offices would be beneficial to both staff and clients, but this does not have to be daily to achieve the goals of our service to help clients.

- We hope these points will be considered in the overall picture of our new organisational functions.
- Work and Income does not care about NFIU.
- This concerns many of our colleagues now we are once again to fall under the W & I umbrella. We've been asked for feedback on the information supplied and concerned about the insufficient information on how we will fit into the new structure.
- Fraud continues no matter what strategies W & I come up with for client service. Therefore NFIU and IIC will always be necessary parts of MSD and yet we are once again, as per last time we fell under W & I, barely considered. Our job grows and grows every time W & I simplifies matters for the client – no verification needed actions in particular.
- Some clients who are offered the opportunity to commit fraud will always do so! We do not suggest all of them will, but we have seen an increase in allegations in recent years since applications/renewals become easier for a client to omit information we had previously asked for.
- For instance, why does a COA form have no need for a landlord's details to be provided? If a client is asked for verification of the rent and does not provide it, there is no follow-up in many cases to ensure that asked for information is provided; instead the Acc Supp is simply granted and the verification remains un-provided. There is a huge amount of fraud involved with address/rent/board details – time after time NFIU staff find upon checking that the client does not live there, did not pay the rent advised, and in some cases never lived there or paid nothing.
- Work and Income staff are under pressure; we understand this. But NFIU and IIC staff are also under pressure. Currently, there are over 3000 unassigned fraud cases waiting to be looked at. Many of these have simple starts – the client was not asked to provide enough information; instead they were simply granted a benefit or supplement based on the information they supplied.
- Some simple checks by W & I staff or through some info-sharing or stored information checks (maybe new ones that have yet been thought of or collated) could quickly and easily show that the supplied details don't add up, and the supplement or benefit should never be granted. No incorrect grant = no fraud.
- Notes by case managers sometimes lack simple details like: landlord's name and address, employer's name, where did the address or phone number come from? Did the CM ask the client anything about circumstances surrounding the new baby's conception or just include it with no questions asked?
- Simplifying income declarations would also help. IIC are receiving 11,000 cases per month for people who have not declared income. If clients could declare income online or via texts, or if we could automate reminders (by text or email) to go out to anyone who has declared income so that they continue to do so, would help enormously. It's far easier to 'forget' or omit to declare than it is to struggle to get through on the phone lines or call in for advice.

- These things must be considered! Fraud wastes taxpayer money and NFIU and IIC do their best to stop fraud, but once again we are the ambulance at the bottom of the cliff and come to the party well AFTER it's already started. Gate-keeping and checks at the start of entitlement help stop it BEFORE it starts, and save the Ministry a great deal more money than establishing an overpayment does. And if the hard-end fraudsters are to be punished via the courts, we must make our systems rigorous enough that they cannot begin the fraud, where possible.
- Please consider NFIU when realignment occurs! We are needed and we have good ideas to help get people off benefit – some of them should not be even on it to begin with and would not be if pre-checks occurred before benefit/supps were granted.
- And add-ons and supplements would be greatly reduced with a few simple questions and checks in place. How many additional children should a single person on SPS (since the first was born) be allowed before we ask the question 'are you in a relationship?
- A shared concern with the realignment is that our ideas and strategies will go to waste if you ignore us and we once again become the 'poor second cousins' to W & I, and no resources and consideration are given to our area. We'll continue to struggle to bring fraud under control while W & I hands out money as quickly and simply as possible in order to speed up the client's visits (not all bad, but needs a happy medium).
- Yes, we believe in an all-round service so that the client can deal with everything without having to repeat information or spend hours jumping through hoops to get much-needed funds, but they also deserve to be treated fairly and quickly in relation to any allegations of fraud against them.
- Some people will always need to have their information checked. Case managers know their clients (when they deal with them consistently and often) and they know when something 'is not right'. As first point of contact, that information is critical – but CM's cannot be expected to deal with in-depth investigations – and any information they gather needs to be FULLY noted so that investigations can proceed quickly and without the frustration of half-documented information.
- We have information to share too, and documents we collect could also be of use to W & I, but as we don't have the facility to scan into UCVII, this can again be frustrating – therefore allowing us that facility could be helpful to W & I.
- Interaction between the two service lines can only be useful – we do, after all, deal with the same clients – and would like to hope that NFIU and IIC will be given more consideration in the overall scheme of what MSD is trying to accomplish than W & I appear to be giving them through this reference group.
- NFIU, while needing to work in tandem with W & I, needs to stay together, however. Centralising us beyond the way we are, or splitting us down further into separate W & I offices would be detrimental to what we are trying to achieve. We have a combined knowledge in many areas that would be harder to access and share if we were distanced, and if we were combined further or centralised, it would be difficult to provide the service to clients, and insofar as technical officers are concerned, to our investigators. This also needs consideration in the larger picture.
- We appreciate that this is long and somewhat rambling, but am aware there may be a time limit in providing feedback, so we hope that it will be read and carefully considered before the realignment continues.

Structure

Preferred Structure Proposal

Fraud is a national issue not a regional issue and we believe it should sit under Risk and Assurance reporting to Director Intelligence and Integrity. This would provide:

- Greater consistency
- Expert knowledge for:
- Search warrant approval
- Legal liaison
- High risk situations (suicide/self-harm)
- Police liaison (high level consultation re search warrants and MOU etc.)
- Allow resource sharing across regions i.e. QA's, TO's and IO's during an overflow of work such as IRIS.

Structure Proposal 2

Regional under Service Delivery, but reporting to a Regional Commissioner Fraud and therefore still a national unit. This would provide:

- Greater consistency
- Allow resource sharing across regions

Please Note: We believe it is necessary to establish Senior Fraud Investigator roles in units that have high investigator numbers i.e. any unit with a ratio greater than 1 Manager to 8 staff. As a national resource they could be used to train new investigators in smaller centres etc. Liaison with other Government agencies/attend CLAG

Prevention

- More publicity re prosecutions
- More signage in Service Centres. "We take benefit fraud seriously" "Your obligations matter"
- Investment approach
- Education for Case Managers "hard questions"
- Support for Case Managers via Liaison officers
- Local initiative actions
- Handle Case Manager File suspicions locally therefore able to feedback outcomes and generate further education/training.
- Engender confidence in Case Managers trust your "gut" and you are doing the right thing.

Members Feedback:

"In the scheme of the organizational structure IIC seem somewhat lost, in a sea of pink. Considering the larger Investment and Risk approach of the Ministry and risk defined as , " possibility of loss of investment or in this case loss to the taxpayer," haven't we at IIC saved a few millions in monetary terms and thus lowered that risk? I was wondering whether it would not be more appropriate for us to be aligned with "Risk and Assurance and Intel "as a division within that pillar. In my view that will bring out the uniqueness of our function rather than be seen as a mere processing Centre."

- "I am located in the Allegation Line as an IIO (Integrity Intervention Officer) this is a National Call Centre based in Lower Hutt and has to date come under the umbrella of the IIC within MSD.
- With the proposed changes 'they' intend to rename my role to that of a CSR remove my 2IC and Quality Officer and 'blend us' into the Contact Centre to me this is not a 'smart move'.
- I am not a CSR and in the long term given 'their' desire to multi skill or as stated: "By grouping these services together we create opportunities to redirect resources across workflow and/or season peaks."
- This in my specialised role would not be possible and would result in a diluted allegation lacking quality and therefore create a 'risk to The Ministry'. At any rate the term CSR Customer Services Representative does not fit the contact we have the majority of which is with the general public only a small percentage would be existing beneficiaries and includes Police Officers/Probation Officers/Social Workers/Counsellors and involves at times highly sensitive information within the allegation the necessitates CYFS referrals in regards the care of children that may be a risk. It therefore is not and I can only repeat not a CSR role that I undertake in the Allegation Line.
- So the up-shot is my title/contacted name or work changes my location of work will no doubt change and so say the least I am concerned with the prospect of how the new tile of position will affect the 'quality' and therefore 'value' of my work to 'The Ministry'.
- I also note that in the documents associated with the changes there was at list of job descriptions for the proposed new roles. Well my role has the proposed changes from an IIO to a CSR yet no description of this CSR role contained in that document.
- I am relaying my basic concerns to you as suggested in the PSA Union Update dated the 29/8/2014."

IIC staff that are currently in the Allegation Line are forced to move to the W&I Contact Centre as CSR Allegation Line

- Each of the work-stream within IIC allows the Integrity Intervention Officer (IIO) to learn different parts of MSD. As a centre we interact with different units depending on which match you work in. Allegation Line works with NFIU, Customs Match with Seniors and StudyLink etc. Forcing IIO to move to W&I Contact Centre reduces that ability.
- W&I Contact Centre role is to answer the phone and book appointments for W&I. Call handling times do not offer the choices we get in IIC.
  IIO should be given the choice.

No technical support moving with the Allegation Line:

- W&I Contact Centre role is to answer the phone and book appointments for W&I. W&I Contact Centre role is not about processing work. Strict Call handling times are monitored.
- Allegation Line is different – keep the caller on the line as long as possible to get lots of useful information that NFIU can look at when considering investigating the case.
- Follow Rata and Peace plus think about RDS, CUH and CYF.
- Processing all information into IMS or refer information to places like CYF or CUH.
- Process any paper-based information and then go back on the phones.
- This is totally different approach to just answering calls like W&I Contact Centre does.

Senior Integrity Intervention Officer (SIIO) should go with the team as he/she is the technical expert. To fit W&I Contact Centre current structure maybe change that role to Quality Officer.

Remote Staff come back to IIC

- The last time remote staff joined IIC it was unsuccessful. Theses staff are part-time workers and the cost of couriering work to them and from them daily / weekly, cost of travel and accommodation to attend training sessions or to interact with the IIC. Their inability to cover our phones or do any other part of the IIO role including Opts Management.
  These part-time remote staff should be incorporated in their local Service Centre, perhaps with the old NFIU staff. This would make use of their skills set, provide support for the old NFIU staff or give advice to W&I frontline staff. The cost would also be way less for MSD as a whole.

National Manager Role is disestablished

- W&I, Seniors and StudyLink all have units doing the bulk of their processing work.
- IIC is about integrity of systems, compliance, prevention, plus ensuring our clients get full and correct entitlement to any financial assistance they receive across MSD. IIC crosses all the above units plus NFIU which allows us to work with other units.
  Removing this voice means IIC loses it profile. The fact that no other department has a National Manager isn't reason enough to get rid of it. Keep the role.

EA role is disestablished

- This staff member has a huge amount of experience about IIC and the MSD as whole.
  Move the person into the EA role to support the Operations Manager.

Proposed quality line-up of 6 QAs and 1 QAO

- It doesn't work the way this is currently handled. The focus is either on training *or* checking, with the other function suffering at the time.
  We want dedicated trainers and checkers like all other business units have.

CCOT writes our training material and QA or QAO delivers it

- IIC is about integrity of systems, compliance, prevention, plus ensuring our clients get full and correct entitlement to any financial assistance they receive across MSD. IIC crosses all the above units plus NFIU which allows us to work with other units.
- This is a different approach to what CCOT does now. We question whether CCOT will have the technical knowledge about our requirements around matching.
  Have an IIC representative / liaison at CCOT. Or CCOT person is based here once a week or one week per month etc. so that they can be in our environment and get a grasp of what we do for when they're writing the manuals. We also want dedicated trainers and checkers like all other business units have.

IIC reports to CS

- IIC doesn't do any interviews. We do take phone calls however the bulk of what we do is processing.
  IIC should be in the Centralised Services pillar.

Allegation moves to Contact Centre pillar

- IIC doesn't do any interviews. We do take phone calls however the bulk of what we do is processing.

IIC should be in the Centralised Services pillar.

- The Allegation Line *function* becomes part of the Contact Centre, and *a* Service Manager goes with them. The phone technologically this pillar offers would enhance the services the Allegation Line can offer NFIU.
  It is predominantly a call centre process so should be grouped accordingly.

NFIU goes to RDS

This group do interviews and appearances at court – at face view it would make sense that this group aligns to this pillar.

Desk Base Review work moves back to IIC

- This work is processing.
  NFIU doesn't have a processing centre it would make sense that this work moves back to IIC.

IIC OA and BA staff will report to Business Services

- The concern for us is that these people performing these functions will end up with different priorities than just IIC. IIC will end up at the bottom of list.
  The proposal is that these people still sit within IIC which implies they will continue to support us.

Collections:

Disestablished Roles –Trainers:

- Collectively we disagree with the loss of our trainers. Computer based training programs cannot replace face to face interaction and support that our trainers provide on a daily basis. Without trainers we believe that this will put extra pressure on Site Managers and increase their already busy workloads. It has been suggested that if we were to lose our trainers –we propose the increase in number of Site Managers to 3 instead of the current 2. Smaller teams per site manager has also proven in the past to provide better results.

Task Management:

- Restructure creates an unknown factor for Task Management. We are unsure if this is to continue to go ahead as this will be a decision for the new GM to decide. In the interim we propose that current changes be put on hold. Currently new processes and tools are still being implemented which have specifically been designed for task management. We also request that our Workbooks used for Caseload Management be kept in place so that we can affectively continue to do our roles in this time of uncertainty.

Extended Hours:

- New teams and managers have been hired to work the new extended hours. There is no room for extra staff or the extra manager in the new structure. What will happen to this team once the realignment takes place?
- Insofar as the Collections sites are concerned, the plan means that our on-site trainer position will be lost – centralised to a pool of trainers. As we have experienced over the years, Collections is always very low on the priority list when resources are shared – so training/coaching will be a resource which will only be seen very rarely. Accordingly we

are extremely unhappy with this proposed loss from the Collection sites and do NOT support this aspect of the plan.

- We would like to see this position retained permanently at each site to assist with training, mentoring, troubleshooting and ensuring best practice - as has been part of their current function. On a technical point and, if necessary, they could be re-titled as a 'business' advisor, mentor or coach or as an "assistant managers".

Motivation

Our detailed motivation for not accepting this aspect of the proposal is as follows:

- The trainers currently fulfil an essential daily role in mentoring and ensuring best practice and problem solving;
- As alluded to above, Collections is not a "front-line" function and consequently is always very low on the priority list when resources are shared between MSD business units– so not only will training be a resource which will only be seen very rarely, but we will not have it continually and at close call;
- Although the plan is for Collectors to move from portfolio based roles to task based roles, our processes & practices are constantly evolving and changing and, as it currently does, this close at hand coaching resource will save Collectors a lot of wasted time and improve their collection effectiveness, i.e. "collecting smarter, collecting more".
- With the transition to task based management and the concomitant requirement for all Collectors to handle all facets/know everything – this will see a lot of collectors struggling with types of tasks we never normally dealt with and the need for a trainer/coach will be imperative to reduce the resulting stress;
- They have an enormous amount of 'institutional' knowledge which has been accumulated over many years which will be lost; this is an invaluable resource for Collectors to draw upon when struggling with complex, unusual or rare scenarios;
- The existing structure did not make provision for "succession planning" for this and so this unique resource of institutional knowledge will now not be retained where it is needed, and there will be no-one at the sites with the expertise or time to fulfil this vital role;
- The two managers at each site will be left with no support staff & have no assistant managers. They will not have the time and, as most have not had long MSD collector hands-on experience, they will not have the specialised knowledge to perform this function.
- MSD will lose the money they plan to save by centralising these 3 positions through the cumulative wasted time and poorer efficiency of the 70-odd Collections team members.

Proposal

Accordingly our proposal is that the Collections site trainer position in is not centralised, but that one trainer is retained at each Collections site.

If necessary, that position could be re-named "business" advisor, mentor or coach or as "assistant manager".

The rationale for the proposed change in title is as follows;

- An acknowledgement that in their current roles our 'trainers' spend less than 50% of their time doing "formal" training, i.e. covering new material/ procedural changes etc. with a staff group or training new appointees on how to be Collection Officers; they spend a lot of time doing non-structured coaching or one on one mentoring or trouble shooting;
- If the MSD want the training personnel centralised it implies to us and we have made the assumption that these personnel will be doing structured training courses or interventions and assigned on an ad hoc basis to various units to undertake training tasks for short periods

of time as and when the need arises, thereby not being able to perform their full time role as they are currently doing at Collections;

- So in order to circumvent the (re-structuring) requirement that training be centralised (which has its merits for other units) and our trainers consequently having to re-apply & be removed from the Collections site, the proposal is that, if their title is changed, then they do not fall within the category of centralised trainers and have to move away. However, this does imply that 3 new full time titles/positions would be created in the Collections unit that is not part of the current re-structuring proposal; but to counter this – there might be a reduction in the number of trainers required in the centralised training team.
- So by not calling them trainers, one avoids any allegations that Collections are treated differently by having 'permanent' trainers on site as part of the team and it also reflects the reality that their role is more diversified than just training and they are sharing their institutionalised knowledge to improve results and support management.
- Clearly, if our assumption is wrong and we can retain their full time services whilst still being part of a centralised training team then most of these arguments for a title change fall away.

WORK AND INCOME: SPECIFIC FEEDBACK

PSA members see a risk with a manager have a significant number of direct reports. They are concerned there will be "bottle-necks" for progressing work and the potential impacts on the PDA process with too many direct reports.
PSA would like confirmation of the ratio of managers to staff (direct reports)?

There are concerns for Work and Income members in that they do not know what the outcome of these changes will have on the frontline services.

This is evidenced by the lack of robust feedback from W&I in the field, we believe this is due to the member's perception which has not been countered by any of the information that the rest of MSD is merging into them rather than the concept of an integrated service line coming together.

RECOMMENDATIONS:

The PSA would like to make the following recommendations:

- That the Ministry engage with their employees in Work and Income and ensure they are aware of what an integrated service delivery line will mean for them.

- The Ministry commit to reviewing the changes to ensure that intended rationale, aims and Ministry goals are being meet. The PSA wold strongly urge that this would involve surveys and conversations with staff at all levels.

- 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.

- The Ministry commit to seeking feedback from key stakeholders of all the service lines to determine if service has been maintained and strengthened by the new structure.

- The Ministry agree to re-evaluate positions where a position is written in wider generic terms and more functions are added into the job description.

- Lessons from this restructure are used to inform future restructures within the Ministry particularly in relation to the lack of detail.

- The PSA 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.

- 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 phase of work
    - Consult with the PSA early about the next phases of work and the implications for members

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

- 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.

- The current vacancies across the Ministry are ring-fenced for affected staff.

- The decision document includes:
    - An explicit statement that staff in the smaller service lines will continue to undertake all tasks in their current role
    - The timeframe for members to provide feedback on the new job description before they go to the job-sizing panel
    - Clearly identifies transition of functions into new roles and provides clear timeframes

- 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.

- The decision document identifies how the removal of Senior Services will lead to better services for older people.

- The decision document to detail how the proposed structure enables better fraud detection than what already exists.

- 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.

The PSA /members who have made submissions would like the opportunity to talk to the/their submission.

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

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