

Re-imagining Norfolk Consultation Response

Community Action Norfolk (CAN) recognises the huge challenge the public sector faces as a result of radically declining resources and a long term trend of significantly increasing needs.

Norfolk County Council (NCC) is not alone in either facing this challenge or in seeking to meet it. Norfolk's Voluntary Community and Social Enterprise (VCSE) sector comprises of over 3,500 organisations investing at least £350 million a year and a larger amount of in-kind support building a stronger, fairer Norfolk. The VCSE sector faces a range of significant challenges but remains committed to working with partners to ensure the best possible outcomes for the people of Norfolk. CAN as the leading organisation supporting engagement with the VCSE in Norfolk has a key role enabling that partnership to develop.

Broadly CAN welcomes Re-imagining Norfolk as an approach and the desire to more holistically reshape the service offer rather than simply focus on reducing spend in individual areas.

We support the general direction of travel in the county, with its stress on independent living, early help and a culture of prevention and early support in communities rather than a reliance on residential and other high intensity services. This strategy promises to allow us to address the resource challenges we face whilst acting in the best interests of the majority of people. We welcome the commitment made by NCC to simply not retrench to the delivery of statutory services in the recognition that this will be to the long-term detriment of the people of Norfolk. However, NCC cannot reshape its role in isolation. The VCSE sector has consistently asked to be involved in shaping decisions not simply responding to proposals.

Close to 200 VCSE organisations have been involved in conversations with us regarding Re-imagining Norfolk and this document has also been tested with members of the VCSE System Leadership Group.

In response to the Re-imagining Norfolk consultation we would first highlight that there has been no meaningful engagement with the VCSE sector in terms of shaping these proposals. Whilst we recognise the practical limitations on the Council and welcome the positive rhetoric about moving forward together, a key requirement of the sector is involvement in an 'upstream dialogue'. This means meaningful engagement at the inception of policy and strategy not just being asked to be involved in its delivery or our opinions of it. This is particularly key given the increased role for communities and the VCSE sector inherent within many of the identified approaches. Without effective engagement the NCC strategy is predicated on dangerous assumptions and risks damaging the relationships necessary to take it forward. We have worked with NCC to take initial steps to move this engagement forward for future years but the promise of these early efforts must be translated into meaningful outcomes to ensure the continued confidence of the VCSE sector in a redefined positive partnership with NCC. We have supported the establishment of the VCSE System Leadership Group, identifying its membership to be broadly representative and accountable to the wider VCSE sector. We regard the VCSE System Leadership Group as the key vehicle for taking forward the upstream conversation with the wider VCSE sector.

What has also been highlighted to us as part of our engagement activities is a number of organisations who were not aware of proposals directly affecting them. On investigation it does



appear that organisations had been contacted but the potential impact of proposals had not been fully understood. Whilst we recognise the sensitivities, we consider early informal and formal communication with those organisations that may be directly affected to be vital, there should be clarity about the full impact of those proposals. This not only helps those organisations plan effectively but also supports NCC to fully understand the impact of their proposals. We believe that NCC was not aware of the knock on effect to organisational viability or connected services when it put forward a number of proposals. In addition, with many proposals there is an assumption that VCSE organisations will fill the gaps in provision. These assumptions have been made without the necessary engagement as outlined above and without a clear assessment of the VCSE capacity to deliver this. Whilst NCC has a range of difficult choices to make, making such decisions in the absence of relevant, accessible intelligence is imprudent.

CAN is pleased that, as with the last consultation, rurality has been included within the equality impact assessment framework. We view this as absolutely critical in a county where 53% of the population live in rural areas. We have again collaborated with NCC using our model of rural impact assessment to identify where proposals are likely to be significantly disproportional and detrimental to rural areas.

In particular we draw attention to the significant and disproportionate impacts of ASC012 (Adult transport cuts) on rural areas. As detailed below transport is a key enabling service and it is vital that no cuts take place in these areas without appropriate mitigations being put in place first.

As with all aspects of the EQIA process it is critical that elected members fully consider and act on their findings and that appropriate mitigations are implemented in all cases where proposals are taken forward.

In response to the Re-imagining Norfolk proposals overall four key strands have consistently been identified by the VCSE sector in our discussions:

- **Lack of strategic coherence.** The VCSE is supportive of the overall shift towards a prevention focused approach. However, a number of the major cuts identified focus on prevention based services (Supporting people (ASC012), reducing funding for youth work (CL011)). This results in a lack of logical consistency between stated priorities and resource alignment. With regard to the supporting people proposal one aspect highlighted to us is the expectation of a reliance on the individual's Personal Budgets to pay for support in the future. Personal Budgets have a much higher threshold than that required to currently receive supporting people services. In addition, to the challenges for some clients with the personal budget system this focuses support on a higher need group and away from those with a greater existing level of independence. This increases the likelihood that they will transition to a higher level of need in the future. This is not simply poorly strategically aligned with a prevention focus but actively undermines NCC's objective of promoting people to live independently.
- **Disproportionate cuts being passed to VCSE organisations.** Departments were tasked with identifying 25% budget savings. The majority of cut proposals directly affecting VCSE led services range between 50-100%. The VCSE sector overall should not be disproportionately affected by public sector funding reductions. Often these are cuts to organisations that are better placed to complement NCC investment with additional funding and services. Though some cuts seem minor in financial terms, they can represent a critical element of some organisations' funding portfolio and could risk undermining their viability.
- **Disinvestment in the VCSE.** This was expressed in relation to the Children's Services Early Help hubs. The Early Help Hubs are a new initiative with no track record of delivery.



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Its focus mirrors many of those services delivered by the VCSE identified for cuts (CHL011, CHL009 etc). This is viewed with real concern by many VCSE organisations who see this as a disinvestment in the VCSE sector in favour of NCC internally delivered services. This is a significant concern in itself with the potential to harm future working relationships with the sector. It is also viewed as a poor investment choice to disinvest in services with a good track record of delivery and establish new services led by a department with a range of performance and quality problems.

- **Lack of a strategic, personal centred outcomes focused approach.** Re-imagining Norfolk states the intention of putting people at the centre of what NCC does. The VCSE fully supports this but does not believe it is being realised through the current approach. The current mechanism of departmental spending reduction targets creates a service focused and not an individual focused approach to cost reductions. It also undermines a system-wide strategy and reinforces silo-working. The most prevalent example of this is around transport. Transport is a key enabling service that poses a significant challenge in a large rural county and for many of our most vulnerable people. Cuts proposals to transport, most significantly ASC012, are:
 - Not person centred and outcomes focused as they undermine transports key role as an enabling part of the support package.
 - Undermines a prevention focus in that by making transport more challenging it may force individuals to seek support less frequently or at a later point (often making their need more acute)
 - Creates system-wide externalities as the cost of service access is passed onto individuals, (therefore leading to consumption switching) who are often the most vulnerable members of our community and demand is often shifted to other providers such as community transport.

It is our belief that transport and similar areas require NCC to work with partners to develop a coherent strategic personal centred approach and appropriate mitigations around any impacts prior to any cuts being implemented.

These four strands are deeply troubling given that Re-imagining Norfolk process is designed to deliver a more holistic approach.

To effectively take forward the Re-imagining Norfolk agenda NCC will need to work outside its traditional commissioning, funding and policy frameworks. We recognise that in many instances this will require a profound cultural shift for everyone, working as equal partners to achieve a shared agenda. This will necessitate more open discussions, earlier engagement and greater collaborative decision making. Our collective failure to make this shift will result in worse outcome for the people of Norfolk, with reducing resources being used in a poorly co-ordinated way that will not meet Norfolk's growing needs. CAN is committed to supporting this cultural shift and building a strong productive relationship between NCC and the wider VCSE sector. We welcome any opportunity to explore any aspects of this response further with officers or members.

Yours sincerely

Jon Clemo
Chief Executive

