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Title	Customer Transformation Programme		
Report of	Interim Chief Operating Officer		
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Enclosures	Appendix A – Customer Transformation Programme Business		
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Summary

This report seeks approval for the establishment of a programme of work to implement the recommendations of the Customer Access Strategy (CAS).

The draft Customer Access Strategy (CAS) was approved by Policy & Resources Committee in December 2015 subject to consultation. The Committee was advised of the outcomes of that consultation on 28th June and consequently confirmed approval of the CAS.

The June P&R Committee also approved the plan to bring a detailed Business Case, updated Equalities Impact Assessment and Digital Inclusion Strategy for the Customer Access Strategy to this Committee for approval in October 2016.

The Customer Access Strategy sets out a significant move towards digital services. By 2020, the majority of customer interaction with the Council will be via the web and other self-service channels which will be efficient and flexible for residents and businesses. Customers will experience a consistently high quality personalised service that rapidly resolves queries and requests. Customer services will be intuitive, recognising the interests of users and sign-posting them to other services they might require.

Barnet Council wants to be a leader, moving towards the forefront of local government in delivering digital services to its residents.

This work will:

- Improve customer service, interacting with residents the way they already experience from commercial providers, and increasingly expect from government.
- Reduce failure demand, by giving feedback to residents, by getting things right first time online, without need for further more costly contact.
- Help the council meet demand for routine transactions in a cost effective manner by encouraging residents to interact online. Preparing the Council and residents to undertake more complex transactions online in the future.

It will achieve this by:

- Refreshing the Council's web navigation and content to make it more relevant to residents.
- Delivering more online transactions that integrate with the Council's internal databases and processes.
- Taking steps to help residents work with the Council online and to help them
 use the Internet in their daily lives.
- Taking active steps to encourage adoption of cost-effective channels (including web self-service) in preference to traditional channels (face to face and telephone).

The Council has already begun prototyping this approach through initiating changes to the Adults Social Care elements of the current site, and will ensure it realises success from the current implementation before proceeding to commission work under this business case.

Recommendations

The report recommends that the Committee:

- 1. Approves the vision for the future of customer services in Barnet (section 1.2 to 1.6), as agreed on 28 June 2016 as part of the Customer Access Strategy.
- 2. Approves the Customer Transformation Programme Business Case (Appendix A), which sets out the proposed approach. Agrees the capital addition of £1.5m to the capital programme for 2016/17 to deliver Phase 1 of the programme as set out in paragraph 9.2. Notes the overall anticipated costs of £5.4m over a two-year period to deliver this vision. The capital requirements for the balance of the funding

required in future years will be considered as part of the Council's capital investment programme within the Council's Medium Term Financial Strategy which will be brought back to this Committee at a future date for approval based on the successful delivery of Phase 1.

- 3. Approves the Chief Operating Officer to commission the council's contracted IT assurance partner to scrutinise the technical aspects of the programme before funding is released or contracts are signed.
- 4. Delegates authority to the Chief Operating Officer, in consultation with the Chairman of the P&R Committee, to agree an appropriate delivery plan and to enter into contracts to deliver this work with payment based on successful delivery against milestones.

1. WHY THIS REPORT IS NEEDED

1.1. The draft Customer Access Strategy (CAS) was approved by Policy & Resources Committee in December 2015 subject to consultation. The consultation was conducted for 8 weeks between 18th January –14th March 2016. Findings were shared with members at the Policy and Resources Committee on 28th June, 2016 and the final Customer Access Strategy was approved.

The Council's Vision for Customer Services

- 1.2. Barnet's vision for 2020, as set out in the Corporate Plan, is to provide local services that are integrated, intuitive and efficient, making life simpler for our residents and customers. Resident expectations are increasing; people are used to going online to book holidays, to order their shopping, to book a restaurant or cinema tickets. The Council's ambition is to provide a public sector version of the online experience that residents receive from leading retailers and banks.
- 1.3. The Council has made progress and has already responded to the changing habits of our residents by providing more information and services online and via automated telephony. It is now much easier to interact with us to report a problem; to pay a bill; to see how taxpayer resources are spent; and to participate in a consultation. This makes people's lives easier and saves the Council money by reducing pressure on staff resources. However, there is more work to be done to respond to increasing public expectations.
- 1.4. By 2020, the council's customer services will be intuitive and flexible, and we want to see increased resident satisfaction. By 2020, the majority of customer interaction with the council will be via the web and other self-service channels which will be efficient and flexible for residents. Our vision is that customers will experience a consistently high quality personalised service. We want customer services to be intuitive, recognising the interests of users and helping them find council or partner services to meet their needs. Our target is that 80% of issues raised with the council will be resolved at the first point of contact, and that satisfaction with the services people receive will consistently exceed 90%.
- 1.5. Digital services provide a compelling opportunity to influence demand for Council services. There is clear potential to reduce "failure demand", defined as "demand caused by a failure to do something or do something right for the customer". This reduction can be achieved by providing online services that keep the customer up-to-date, that set clear and honest expectations about service levels, and that automate processes end to end, ensuring the council follows-up promptly on requests.
- 1.6. Digital services increasingly allow the Council to support residents in ways that reduce the demand for costly services. Using the right guided technology we can help residents understand the support they need in Adults Social Care, and can connect them with equipment or voluntary services that may better meet emerging care needs than formal engagement with the Council. Combining this

with assistance from residents' formal and informal advocates, whether family members or voluntary sector support provides new approaches to allow the Council to operate within challenging financial constraints while still serving those most in need.

How will we deliver?

- 1.7. The Customer Access Strategy identified that over 82% of Barnet residents have and use the Internet for online transactions. It acknowledged, however, that at present around 80% of resident transactions with the council are still conducted by telephone.
- 1.8. The Customer Access Strategy will shift this figure, such that by 2020 80% of Council customer transactions will be competed through digital means. This is to be achieved through ensuring the online contact methods provided by the council are easy to use and intuitive. The Customer Access Strategy makes 10 recommendations in order to achieve this change, which are summarised here for ease of reference.
- 1.9. It is vital to acknowledge that not all residents will be readily able to access some services online. The Customer Access Strategy is clear that some residents will still require support and access to services through other means, such as over the phone or face to face, particularly for complex or immediate needs, such as homelessness and housing need. The strategy further proposed that face to face services should be remodelled, making best use of new and existing community assets such as libraries and community hubs, as well as the Colindale new build.
- 1.10. Critically, the Customer Access Strategy recommended the creation of a Digital Inclusion Strategy to ensure the needs of vulnerable or digitally excluded residents were addressed. A programme of activity is included to address this.
- 1.11. The ten key recommendations in the CAS are:

CAS

Recommendation 1: Website information provision

Undertake a review of the existing website, as well as considering other ways of providing information, which may include apps for mobile devices such as tablets and smartphones and proactive delivery of information via email in response to customers' own search criteria.

CAS Recommendation 2: Website functionality

Prioritise delivery of key enablers for promotion of self-service, comprising:

- An online bookings/appointments tool for accessing all those services that offer appointments or public facilities
- A corporate payments solution, so that there is one consistent, integrated and user-friendly tool for all services payments to be made online
- An online mapping tool that so that location-based services and service requests and other data can be easily presented on interactive, searchable maps.
- Improved end-to-end management of online customer requests, including providing customers with status

- updates and notification of job completion
- Improved online directories of services and organisations that help residents find partner organisations and services across the borough
- Integration of the Barnet Homes online services with the existing My Account facility on the main Council website, enabling customers to view and interact with multiple services in one secure place.

CAS Recommendation 3: Piloting self-service only services

Pilot a set of services as "Self-Service only". This means that personal support from customer services staff over the phone or in face to face locations would be focussed on helping customers to self-serve, or helping those customers who are unable to self-serve, or who have a complex case.

Pilots identified in the Customer Access Strategy are:

- Reporting highways and street related issues
- License applications for businesses
- Parking
- New bins and waste collections
- Pitch bookings
- Library Membership
- School admissions (excluding in-year transfers)
- Schools information

CAS Recommendation 4: Digital Inclusion

Prepare a Digital Inclusion Strategy in advance of any decisions to make any service self-service only, clarifying how those who are not currently "digitally included" will be supported.

CAS Recommendation 5: Telephone Contact Centres

Undertake a review of Barnet's telephony centres to identify the opportunity to handle all Barnet calls using the same technology, customer care standards, and potentially, the same contractual arrangements.

Undertake a detailed end-to-end process review of key customer journeys in advance of considering "Self Service only" pilots.

- Street Scene service requests, building on the existing project underway
- Adult social care self assessment and information
- Creation of a business portal single point of contact for Council services for businesses (e.g. Business rates, Trade waste). This is also recommended for our first 'App' pilot (see recommendation below).
- Housing services (homelessness, housing options, and tenant and leaseholder services)

These reviews will help us learn how best to approach subsequent service reviews, and what the costs and benefits of redesigning the customer journeys and IT requirements are.

CAS Recommendation 6: Customer and Business Intelligence

Work to ensure that high volume customer data is available across all services, allowing the Insight team to better profile customer needs and demands. Some focus areas include:

Barnet Homes

- Re
- Adults and Communities
- Parking

CAS

Recommendation 7: Social Media

Consider the increased role that social media might play in improving the Council's customer experience through the detailed mapping projects.

CAS

Recommendation 8: Apps

The strategy proposes that the Council develops an app to evaluate whether it improves customer satisfaction and increases self-service when compared to website self-service, and whether the cost is lower. The app would need to provide access to a service with a degree of complexity in order for it to be a useful pilot for testing a broader approach.

Given the Council's aim to encourage an 'entrepreneurial Barnet' and the desire to make Council services for businesses more joined up and easier to access, the Customer Access Strategy proposed that a business app be the first pilot.

CAS

Recommendation 9: Demand management and community participation The strategy primarily focuses on customer access to Council services, but in parallel the community participation programme, overseen by the Community Leadership Committee, is working to establish a stronger role for the community in delivering services and supporting residents.

Demand management is an underpinning consideration for most parts of the council, including both minimising failure demand and in working with partners to provide self-service alternatives, allowing council provision to focus on those with greatest need.

CAS

Recommendation 10: The future of Council face-to-face Services The strategy recommended further investigation and detailed design, informed by consultation with the public, to commence following the Strategy's approval.

As the Locality Strategy has now been completed, delivery of the CAS will align to the accommodation and service locations identified therein.

2. IMPLICATIONS FOR CUSTOMERS

The main changes customers will experience as a result of this programme of work are:

2.1. Much improved web navigation, making content and help easier to find. A web experience that answers the question in residents' minds ("How can I get help for my mother?", or "what's the best way to report a problem with my neighbour?") much more clearly than the current offer.

- 2.2. Webchat, supporting web uptake and providing an additional help channel.
- 2.3. An improved mobile experience, making the web more accessible and navigable from mobile devices.
- 2.4. Deployment of a mobile app for waste that helps remind residents of their waste arrangements.
- 2.5. Improvements to directories of service, making it easier for residents to find third sector or other help.
- 2.6. A more complete resident online account, providing access to see a resident's interaction history online, to set personal details and communication preferences, and to track cases in progress.
- 2.7. A greatly increased range of online transactions. A more complete list is given in the appendix, but highlights include:
 - Social care interactions online (including integration with the Mosaic Portal)
 - A more integrated and capable online Council Tax solution, covering events such as move in, move out and changing payment details
 - Environmental health services including booking and paying for services
 - Integration of a Housing portal for tenants enabling problem reporting and tracking as well as a rent account
 - A range of licensing transactions
 - A business facing portal that helps Barnet Council understand more about the make-up and needs of businesses in the borough, and more effectively target service offers to them
 - Sports pitch book & pay.
- 2.8. Improvements to existing online transactions and forms. Ensuring many existing higher volume forms are moved to integrated transactions. Ensuring that residents get much more proactive feedback on problems, reports or cases they open with the council. For example, notifying residents proactively of a missed bin, rather than waiting until they find out and report it.
- 2.9. Existing customer contact channels will not be altered or removed as part of this phase of work, removing any risk of negative impact on potentially excluded residents.

3. IMPLEMENTING THE CAS

- 3.1. This report recommends a programme be established to implement the Customer Access Strategy. The programme will be delivered through four streams of work, as follows:
 - 1. Refresh the Council's web navigation and content to make it more relevant to residents
 - 2. Deliver more online transactions, that integrate with the council's internal databases and processes
 - 3. Address Digital Inclusion both to help residents work with the council online, and to help them use the Internet in their daily lives
 - 4. Improve services and drive digital take-up doing more to encourage low cost channels (web) in preference to traditional (face to face and telephone)
- 3.2. The programme will refresh the Council's web offering, ensuring it delivers content that is accurate and relevant to a resident's needs as a web user. The Council's web site will be re-organised to better address residents' needs, ensuring the Council's organisation structure and priorities are secondary to customer journey.
- 3.3. Web content improvement will begin by understanding the objectives of users accessing the council's website, will design the web navigation needed to make the highest priority objectives more readily accessible, and will develop revised content and navigation according to priority.
- 3.4. We will greatly increase the range of transactions the council offers online, including integrating with a Social Care portal and providing Housing services online. This will, for example allow social housing tenants to access their rent account online, as well as reporting issues and requesting repairs.
- 3.5. Upon completion of this work, the council will have:
 - All current, and a range of new online forms and online transactions integrated into the residents' account.
 - The ability for residents to see the history of their interactions with the council online.
 - Services from multiple providers and partners drawn together into one user experience.
 - A strong platform on which to develop future generations of online services

Ensuring that people who are less able to get online still have access to services

3.6. A Digital Inclusion work stream has been defined. The approach is explained in detail in the Digital Inclusion Strategy, which is appended with this report. It includes work to both improve residents' general inclusion in Internet services and offers, as well as specific steps to assist with take-up of council services.

Note that existing customer contact channels will not be altered or removed until the Digital Inclusion Strategy is enacted.

- 3.7. The Digital Inclusion work will include identifying those who may be excluded and targeting specific interventions (such as training or coaching) within suitable council and third sector locations. The work notes that Barnet has a large and active voluntary sector, and includes many organisations capable of helping residents engage with the Internet. The work also includes a staff focus, ensuring that council and partner staff are ready to embrace the changes to resident experience.
- 3.8. The council envisages appointing a partner to coordinate the digital inclusion activity, in conjunction with the many local partners who are already active here.
- 3.9. The Customer Access Strategy proposes a move to self-service only services for certain pilot transactions. The final strand of work under this programme is to take the specific enabling and mitigating steps to allow for a move to self-service only, following the delivery of improved online services and the provision of a digital inclusion offer.
- 3.10. Council Officers have considered options for the definition of the first phase of work. Options considered in detail are:
 - Web Content Focus. For an indicative budget of £700-800K, focus work on the Refreshed Web stream for the first 6 months of the programme. (Option 4A in Appendix A)
 - Transactions Focus. For an indicative budget of £1.1m, deliver the first phase of My Account work in the first 6 months of the programme. (Option 4B)
 - Hybrid. For a total budget of £1.5m, deliver first phase of My Account improvements, combined with key web and contact centre activities. (Option 4C)

Sub option 4C is recommended as representing the best value approach to initiating the programme and achieving early delivery.

3.11. The proposed implementation timeline for this work is shown on the following page.

	To end 2016	Jan – Jun 2017	Jul-Dec 2017	Jan-Jun 2018	Jul-Dec 2018
Refreshed Web	ASC Web pilot sprints	Web navigation, content and search	Intensive Web Improvement Sprints (project). Create web team	Continue improvement through BAU web team	
Enhanced My		Phase 1	Phase 2	Phase 3	Phase 4
Account		Core new account; waste & problem reporting	Improve Parking, Library; new council tax services; ASC; Trade waste; webchat	Benefits, Licensing, Housing Portal integrated for rent & repairs	Business Account; Planning services
Digital Inclusion		Strategy preparation and planning	Commission DI Partner Create DI plans and staff Design interventions (staff and resident) Deliver initial interventions	Delivery of Digital Inclusion interventions	Assess results and refine offer Transition Digital Inclusion to steady-state partners (third sector)
Business Change / Self- Service only services		Alignment of non-Coventry contact centres	Assess Create Migrate	Assess Create Migrate	Assess Create Migrate
External Dependencies		Programme Continuation gateway			Colindale office opens
				ADM transition Street Scene	, ASC?

Figure 1 Recommended Implementation Timeline

4. RATIONALE FOR CHANGE

- 4.1. The primary rationale for this change is to realise the vision expressed in the Customer Access Strategy. Using the Internet is now the norm for residents interacting with public and private sector services, and the CAS changes will position Barnet as among the best in Local Government.
- 4.2. The CAS recommendations that this programme implements are summarised in the previous section, and discussed in more detail in the appended report.
- 4.3. There has been significant innovation from The Government Digital Service, who provide www.gov.uk and in Public Sector applications and digital services since the current digital services were scoped and designed. The CAS sets out a far reaching ambition that is achievable with technology now available and mature in the market.
- 4.4. A refresh of web content and navigation will more effectively enable customer journeys and life events. In the appended paper the concept of a resident's Persona is introduced, referring to the role in which a resident interacts with the council. This must address why an individual is presenting and what they need from today's interaction. A number of elements of the current website still reflect the organisation of the council more than the needs of residents.
- 4.5. Although the web technology has been refreshed during the NSCSO contract, the Council's web content and navigation has not undergone a full refresh in a number of years.
- 4.6. A major increase in the range and depth of transactions the Council now intends to offer online is required. Since the inception of the current website and account there are now concrete plans to deploy resident facing web solutions in Adults Social Care, in Housing and in Council Tax & Benefits. Each of these new services requires integration into a common resident account to avoid fragmentation of the user experience.
- 4.7. The CAS looks to migrate from relatively straightforward e-forms to integrated resident transactions. These will integrate directly to the Council's internal databases in many high volume cases. In other cases where e-forms are retained, improvements will be made to ensure requests are tracked and managed.

5. DELIVERY AND COMMISSIONING APPROACH

5.1. The majority of the technical work to achieve this programme will be commissioned through Customer Support Group, the Council's ICT and Customer Service partner. The Council has already begun prototyping this approach through initiating changes to the Adults Social Care elements of the current site, and will ensure it realises success from the current implementation before initiating further work under this business case.

- 5.2. The Council will commission technical oversight of this work from its technical assurance partner.
- 5.3. The Commissioning Group intends to seek a partner for the digital inclusion work. A Restricted Procurement process is envisaged, which should invite both national and local providers to make proposals.
- 5.4. Business Change and Channel Shift will be achieved in partnership between the project team (summarised below) and the Council's delivery units, including the CSG Customer Services team as a key partner, alongside equivalent functions in Regional Enterprise and Barnet Homes. It is intended that the HR function will also have a role to play in staff engagement and communications. Delivery Units will have a significant part to play in this programme, and will need to contribute resource to both guide the activities and to support with redrafting of web content.
- 5.5. Programme management will be commissioned through the Corporate Programmes function, taking advantage of a resourcing route that is cost-effective for the council. This route will also provide change management support into the Business Change and Channel shift work. Consultants or interims are expected to be used only for specialist skills, primarily around solutions architecture.

6. MANAGING SOLUTION AND DELIVERY RISK

- 6.1. As key elements of this programme comprise the delivery of new technical solutions, officers have sought to identify and manage technical and solution delivery risk. Risks in general are detailed in the Appendix A. Officers have identified the following mitigations to technical delivery risk:
 - 6.1.1. As discussed in the commission approach above, the technical work will be committed by phase with payments committed on successful achievement of milestones.
 - 6.1.2. An assurance framework involving the Council's intended technical assurance provider will be established, providing an independent view of the quality of technical delivery.
 - 6.1.3. The Council and its partners are adopting an agile approach wherever the solution type merits it. For the Web Navigation refresh, a fully agile approach will be adopted to ensure limited resources and effort are focused on the highest priority user stories. This focus on continuous reprioritisation will require strong product ownership, provided from a combination of CSG, Delivery Unit and Commissioning Group resource. Each series of sprints will be enabled by a product team who can make rapid decisions about the relevant Delivery Unit and Commissioning Group priorities.

- 6.1.4. A key risk with Local Authority digital implementations is the great range of partner providers of council back-office systems that need to be involved in delivery. There are two aspects to this risk: i) Systems integration risk relating to complexity and effort will be managed by including the integration work as a fixed-price commitment from the provider. ii) Timing risk can be more significant, as frequently third party software providers work to their own release schedule. This will be managed through the programme management team, who will on occasion need to move functionality between releases due to third party constraints. Finally provision has been made for Solutions Architect time in the programme team to manage these technical relationships.
- 6.1.5. The implementation of the CAS is aligned with the ICT Strategy and will be integrated with future work relating to this strategy.

7. REASONS FOR RECOMMENDATIONS

- 7.1. The strategy is needed to achieve the council's vision for customer services in 2020 as expressed in the Customer Access Strategy. The work is designed to address three key drivers for the council:
 - 7.1.1. Improve customer service, interacting with residents the way they expect now, and will increasingly expect in the future (making routine transactions like reporting and parking great)
 - 7.1.2. Reduce failure demand, by giving feedback, by getting things right first time online, without need for further more costly contact
 - 7.1.3. Enable future demand management, now, for routine transactions. Setting the council up to increasingly do more complex transactions (Housing, cusp of care) online in the future.
- 7.2. Officers intend to commission much of the work to achieve the Customer Access Strategy from Barnet's CSG partnership which already delivers the council's ICT and customer services. This continues the strategy of ensuring Barnet's key partners are responsible end-to-end for their elements of the Council's delivery, making sure there are no gaps or ambiguity in responsibility.

8. POST DECISION IMPLEMENTATION

8.1. A two-year implementation programme is envisaged.

9. IMPLICATIONS OF DECISION

Corporate Priorities and Performance

9.1. Barnet's vision for 2020 in the Corporate Plan is to have redesigned local services that are integrated, intuitive and efficient, making life simpler for our

residents and customers. This proposal sets out to implement the changes identified in the Customer Access Strategy to achieve this vision.

Resources (Finance & Value for Money, Procurement, Staffing, IT, Property)

9.2. This report calls for a financial investment of £5.4 million, with an initial commitment of £1.5m for the first phase of the work as set out in the recommendations. The capital requirements for the balance of the funding will be considered as part of the Council's capital investment programme within the council's medium term financial strategy, overseen by this Committee.

Social Value

9.3. The proposals outlined in this report seek to ensure that accessing the council's services is a more efficient and effective experience, that services are more transparent and accountable to the customer, that more information and services are available online so that customers can access them at a time of their choosing, and that barriers preventing customers accessing online channels are addressed through a Digital Inclusion Strategy.

Legal and Constitutional References

- 9.4. Due to the nature of the changes proposed, a full Equality Impact Assessment and public consultation has been completed.
- 9.5. The proposals in the Customer Access Strategy are compliant with the legislative frameworks governing the services covered in the Customer Access Strategy. Where legislation mandates face to face access for clients or customers, this will be provided.
- 9.6. Council Constitution, Responsibility for Functions, Annex A, sets out the terms of reference of the Policy and Resources Committee including: 'To be responsible for the overall strategic direction of the Council including customer care, communications and resident engagement activities.'

Equalities and Diversity

- 9.7. An Equalities Impact Assessment has been completed and updated with the outcome of the public consultation. It concludes that the combined changes proposed by the strategy will not detrimentally impact customers with protected characteristics. The EIA is included in Appendix C. Note that existing customer contact channels will not be altered or removed as part of this phase of work.
- 9.8. Understanding and mitigating the impacts of all changes on customers is an ongoing responsibility that will be undertaken throughout the implementation of the Customer Access Strategy.
- 9.9. The strategy recognises that there is a section of the community for whom face to face and telephone channels will continue to be needed and certain services where face to face access is required to achieve the optimum

- outcome. The proposed changes will not exclude any customer from accessing a service they need.
- 9.10. In addition, a key aim of the strategy is to redirect valuable staff resources to where they are most needed, supporting residents who have more complex needs. Given the need to make savings, it is vital that we design out unnecessary interactions and automate transactional services as much as possible.
- 9.11. The strategy seeks to support customers less able or confident using the website or other self-service options through assisted self-service and through the Digital Inclusion work.

Consultation and Engagement

9.12. The Consultation report for the Customer Access Strategy was presented and approved in June, 2016.

Insight

- 9.13. The strategy makes extensive use of the most recent insight data available, including data from customer satisfaction surveys.
- 9.14. The council has a set of design principles for a positive customer experience that were developed in autumn 2013 through workshops with residents representing the diversity of Barnet. These principles will be used to design changes to customer access.

10. BACKGROUND PAPERS

10.1. Policy and Resources Committee, 16th December 2015 Agenda and Minutes: Policy and Resources Committee Customer Access Strategy Appendix 1 - The Draft Customer Access Strategy Appendix 2 - Equality Impact Assessment

10.2. Policy and Resources Committee, 28th June, 2016 Agenda and Minutes: Policy and Resources Committee Appendix 1 – The Draft Customer Access Strategy Appendix 2 - EIA Appexdix 3 - Public Consultation Feedback