

**DEVOLUTION AND LOCAL GOVERNMENT RE-
ORGANISATION CABINET COMMITTEE**

Tuesday, 8th September, 2026

10.00 am

Council Chamber

AGENDA

DEVOLUTION AND LOCAL GOVERNMENT RE-ORGANISATION CABINET COMMITTEE

Tuesday, 8 September 2026 at 10.00 am
Council Chamber, Sessions House, County Hall,
Maidstone.

Ask for: **James Clapson**
Telephone: **03000 417387**

Membership (17)

Reform (10):	Mr M Harrison (Chair), Mrs S Emberson (Vice Chair), Mr M Brown, Mr W Chapman, Mr P Chamberlain, Mr J Eustace, Mr B Fryer, Mrs M Lawes, Mr T Mole and Ms P Williams.
Liberal Democrat (2):	Mr M Ellis and Mr A J Hook
Restore Britain (2):	Mr O Bradshaw and Ms M Fothergill
Conservative (1):	Mr H Rayner
Green (1):	Mr M Hood
Labour (1):	Mr A Brady

UNRESTRICTED ITEMS

(During these items the meeting is likely to be open to the public)

- 1 Apologies and Substitutes
- 2 Declarations of Interest
- 3 Minutes of the meeting held on 14.5.2026 (Pages 1 - 4)
- 4 Option 4B - Position Statement (Pages 5 - 18)
- 5 Kent and Medway LGR Programme update (Pages 19 - 26)
- 6 Devolution update (Pages 27 - 40)
- 7 Risk Register Update (Pages 41 - 52)
- 8 Service Complexity Assessments Findings (Pages 53 - 264)

EXEMPT ITEMS

(At the time of preparing the agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public)

Benjamin Watts
Deputy Chief Executive
03000 416814

28/8/2026

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KENT COUNTY COUNCIL

DEVOLUTION AND LOCAL GOVERNMENT RE-ORGANISATION CABINET COMMITTEE

MINUTES of a meeting of the Devolution and Local Government Re-organisation Cabinet Committee held in the Council Chamber, Sessions House, County Hall, Maidstone on Thursday, 14 May 2026.

PRESENT: Ms S Emberson (Vice-Chair), Mr O Bradshaw, Mr A Brady, Mr M Brown, Mr P Chamberlain, Mr W Chapman, Mr M Ellis, Mr J Eustace, Mrs M Fothergill, Mr M A J Hood, Mr A J Hook, Mrs M Lawes, Mr T Mole, Mr H Rayner, Mr S Dixon and Mr D Sian.

IN ATTENDANCE: Ms L Kemkaran (Leader of the Council) and Mr C Hespe (Cabinet Member for Local Government Efficiency and Local Government Reorganisation).

OFFICERS: Amanda Beer (Chief Executive), Jenny Dixon-Sherreard (Strategy Manger), Dave Shipton (Head of Financial Strategy), Ben Watts (Deputy Chief Executive), Tim Woolmer (Head of Strategic Partnerships), Edward Thomas (Strategy Manager) and James Clapson (Democratic Services Officer).

UNRESTRICTED ITEMS

30. Apologies and Substitutes (Item 1)

Apologies were received from Mrs Williams who was substituted by Mr Sian, and Mr Harrison who was substituted by Mr Dixon.

31. Declarations of Interest (Item 2)

There were no declarations of interest.

32. Minutes of the meeting held on 23.3.2026 (Item 3)

RESOLVED that the minutes of the meeting held on 23 March 2026 be approved and signed as a correct record.

33. LGR update (national update including progress in DPP areas) (Item 4)

1. The Leader introduced the item, which provided an update on national developments relating to Local Government Re-organisation (LGR) since

the previous meeting of the Committee. The report covered some of the Government decisions from the Devolution Priority Programme (DPP) areas, learning from these decisions, and the implications for Kent and Medway.

2. Mr Thomas presented the report and covered the following points:
 - a. Since the last Committee meeting, ministerial decisions had been announced for four DPP areas: Essex, Hampshire, Norfolk and Suffolk. The report included a summary table setting out the outcomes of these decisions and other relevant contextual information.
 - b. The Secretary of State had advised that the DPP decisions did not set precedents for non-priority areas, however several consistent themes had emerged including; a flexible application of the guidance regarding number of people residing within each new unitary, and ability to incorporate modifications to the existing electoral boundaries that was previously indicated undesirable.
 - c. The Government's assessment criteria appeared to include considerations relating to economic growth, housing delivery and local identity. However, detailed information on how these criteria were being weighted was currently unavailable.
 - d. The Government had confirmed a minimum level of funding for each new unitary authority, and the Kent and Medway councils had agreed local arrangements for administering this funding collectively.
 - e. The Structural Change Orders (SCOs) for DPP areas were expected to be issued after the Government's summer recess, this represented a delay from previous timescales but the intended end date for the process remained unchanged.
 - f. Joint committees would comprise of equal representation from any existing unitary councils, and from the county and district councils.
 - g. Councils were expected to use existing powers to establish community engagement structures such as area or neighbourhood committees, and Councils were required to engage with Town and Parish Councils.
3. The following points arose from Members' comments and questions:
 - a. None of the options achieved a majority of support across the Kent and Medway Councils. Despite this, the Councils continued to work closely together to prepare for LGR. This preparation work took place without pre-determining the Government's decision and was needed to enable the Council's to act in line with the Government's implementation timeline.
 - b. LGR was a government directed process, it would be irresponsible for the Council not to take steps to prepare. Preparatory activity was proportionate, phased and flexible, undertaken in accordance with normal governance processes and best value duties.
 - c. The Council had provided feedback to the Government in support of Option 1a.
 - d. Service delivery would continue as usual during the transition period, and councils were expected to act in the spirit of the anticipated statutory controls while maintaining operational stability.
 - e. Members could be provided with a breakdown of which option had been chosen by Government for progression in areas where a decision had been made. This could include which political party led the council that had submitted the option.
 - f. Further information regarding the constitution of joint committees would be brought before the Committee at a future date.
 - g. The Council's External Auditors, Grant Thornton, produced a report on the impact of LRG that could be shared with Members.

4. RESOLVED that the Committee note the update on Local Government Re-organisation.

34. Update on Service Complexity Assessments (KCC internal preparation for LGR)
(Item 5)

1. The Leader introduced the item, which provided an update on progress with the Service Complexity Assessments (SCAs) being undertaken to support the Council's internal preparation for LGR.
2. Ms Dixon-Sherreard presented the report and covered the following points:
 - a. The SCA methodology had been designed and tested through pilot exercises. Phase one of the programme was formally launched at the end of April and there were now over 170 services actively participating.
 - b. The purpose of the SCAs was to provide a comprehensive understanding of how services operated, identify operational and statutory complexities, and assess the potential risks associated with transition or disaggregation of services under different LGR scenarios.
3. The following points arose from Members' comments and questions:
 - a. The uncertainty generated by LGR had implications for long term contracts, procurement arrangements, workforce recruitment and workforce retention. A report on workforce considerations was due to be considered by the Personnel Committee.
 - b. The Council had a duty to ensure best value for the residents of Kent when tendering new contracts. Careful consideration was needed to ensure that contracts enabled the Council to carry out its current functions while also remaining fit for purpose following LGR. A report regarding contracts and procurement during the LGR process would be considered at a future meeting of the Committee.
 - c. The SCAs were intentionally comprehensive and designed to avoid assumptions about where complexity or risk might arise.
 - d. Some external consultancy support was necessary to support the scale and pace of the work needed to meet the Government's timeline. Consultants would work in conjunction with internal staff.
 - e. The methodology had been shared with the other Kent and Medway Councils who have begun to undertake their own SCA's.
 - f. The data collection phase would continue through May, followed by analysis in June. An initial set of findings were expected in July. This timetable was intended to ensure that the Council had robust evidence base ahead of the anticipated ministerial decision.
4. RESOLVED that the Committee note the progress and next steps in delivering the Service Complexity Assessment process.

35. 26/00028 Procurement of a Strategic Partner for Kent and Medway LGR Programme
(Item 6)

1. The Leader introduced the item, which set out proposals for the joint procurement of a strategic partner to support phases three and four of the Kent and Medway LGR programme. The strategic partner would provide programme management capacity and specialist expertise, to support the planning process and the transition of services to the new unitary council/s.
2. Mr Woolmer presented the report and covered the following points:
 - a. All 14 Kent and Medway authorities had agreed that the scale and complexity of LGR meant that additional specialist capacity would be required. KCC had been asked to act as the lead procurement authority on behalf of the authorities.
 - b. The strategic partner would not hold any decision making powers. Their role would be to provide advice, guidance, assurance and additional capacity to support the safe and lawful transition of services, while ensuring that these day-to-day functions continued to be delivered effectively.
 - c. Funding had been announced by Government to support the next phase of LGR. The costs expected to arise in the 2027/28 financial year would be considered as part of budget setting process. They would be managed in accordance with the agreed cost-sharing arrangements that existed between the 14 authorities.
3. The following points arose from Members' comments and questions:
 - a. The target was to have a strategic partner in place by the middle of May 2026.
 - b. The majority of pre-investment day costs would occur in the 2027/28 financial year. It was estimated that around 8% of the overall transition cost would need to be borne by the existing councils.
 - c. The exact cost of the contract was unknown at this stage but was expected to exceed £1million. It was brought before Members for consideration because it was a key decision.
 - d. The proposed approach would help to ensure the Council's readiness, while retaining flexibility and avoiding over commitment. It would also avoid the need for multiple smaller procurements and reduce the risk of delays following a ministerial decision. The scale of support could be adjusted as the exact requirements became clearer.
4. RESOLVED that, the Committee endorse the proposed approach and support the recommendations to the Leader as set out in the proposed Record of Decision.

36. Work Programme
(Item 7)

RESOLVED to note the work programme.

From: Linden Kemkaran, Leader of the Council
Amanda Beer, Chief Executive

To: Devolution & Local Government Reorganisation Cabinet Committee – 8 September 2026

Subject: **Option 4B – Position Statement**

Classification: Unrestricted

Summary: This report provides the Cabinet Committee with a position statement following the Secretary of State's decision of 16 July 2026 to select Option 4B as the future structure for local government in Kent and Medway. It sets out the basis and rationale for that decision, the Administration's response and the options available to the Council should it wish to challenge the decision.

Recommendations: Cabinet Committee is asked to:

- 1) Note the basis and rationale for the Secretary of State's decision to select Option 4B, as set out in Section 1.
 - 2) Note the concerns raised in the Leader's letter of 27 July 2026, as set out in Section 2, and note that no substantive response from the Ministry of Housing, Communities and Local Government (MHCLG) has yet been received.
 - 3) Note that the option of a potential legal challenge remains under review and that a related judicial review longstop date, should it become appropriate, would be by mid-October 2026, subject to the standard requirement to act promptly.
 - 4) Note that implementation preparation must continue in parallel with any legal challenge, reflecting the Chief Executive's role as Senior Responsible Officer for LGR delivery across Kent and Medway as set out in Section 4.
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1. The Secretary of State's LGR Decision: Basis and Rationale

1.1 On 16 July 2026, the then Secretary of State for Housing, Communities and Local Government, the Rt Hon Steve Reed OBE MP, wrote to the leaders of Kent and Medway's fourteen councils to confirm his decision on the future structure of local government across the county. Of the five options submitted, he selected the four-unitary proposal supported by Dover District Council, Swale Borough Council and Thanet District Council (referred to as Option 4B) over the County Council's preferred single-unitary model, Option 1A.

1.2 Option 4B creates four new unitary authorities, each replacing the current arrangement of a county council and the district, borough and city councils operating within it. North Kent will combine Dartford, Gravesham and Medway; West Kent will combine Maidstone, Sevenoaks, Tonbridge and Malling, and Tunbridge Wells; Mid Kent will combine Ashford, Folkestone and Hythe, and Swale; and East Kent will

combine Canterbury, Dover and Thanet. Vesting Day remains set for 1 April 2028, with elections to the new shadow unitary authorities in May 2027.

1.3 The Secretary of State's reasoning rested on three principal grounds. On alignment with functional economic geography and housing delivery, he judged that Option 4B struck a better balance between scale and local connection than the alternatives, citing North Kent's role in the Thames Estuary growth corridor, West Kent's professional services and life sciences base, Mid Kent's mix of urban, rural and coastal assets, and East Kent's health, life sciences and creative-economy potential.

1.4 On place-based service delivery, he acknowledged the additional disaggregation risk created by moving from two tiers to four new authorities but concluded that the resulting structures would better align with existing public sector boundaries. On neighbourhood empowerment, he pointed to the proposed use of neighbourhood area committees as a mechanism for community influence over local service design.

1.5 On the financial case, the letter is more equivocal. The Secretary of State stated that Option 4B was *'likely to generally represent an overall improvement in, or be similar to, the sustainability of current structures'* – which appears to accept the possibility that four new unitaries would deliver no net financial improvement over the existing two-tier structure. He acknowledged that the single-unitary option could deliver greater savings but concluded that it did not meet the wider criteria, principally because of its population - at almost 1.9 million residents, Option 1A would have created the largest local authority in England.

1.6 Two matters received comparatively limited treatment, given their particular significance to Kent and Medway. On unaccompanied asylum-seeking children, the Secretary of State recognised the pressures that reorganisation places on existing statutory arrangements and committed MHCLG to working with the Home Office, the Department for Education and affected councils to ensure continuity of service and provision. The letter is also silent on the county's distinctive border-related transport responsibilities at the Short Straits crossings, the Channel Tunnel and the inland border facilities, as well as the associated highways resilience functions exercised through Operation Brock – despite MHCLG's acknowledgement in its interim feedback letter of 15 May 2025 that these represented a 'unique consideration' for Kent's reorganisation.

2. The Administration's Response

2.1 The Leader of the Council wrote to the Secretary of State on 27 July 2026. By that date, the change in Government meant that the letter was addressed not to Mr Reed but to his successor, the Rt Hon Angela Rayner MP. The letter requests further explanation and information and sets out four substantive areas in which detailed explanations and supporting documentation are sought:

- **Assessment of Option 1A.** The letter identifies an apparent inconsistency between the decision letter's finding that Option 1A did not meet the statutory criteria and a verbal statement made by the Minister, Baroness Taylor, at the

meeting convened to brief council leaders on the morning of 16 July, at which she is recorded as saying that all proposals had met the criteria. The letter also draws a distinction, taken from MHCLG's own correspondence, between a 'preliminary assessment' conducted before consultation and a 'formal assessment' conducted afterwards. It asks whether Option 1A was found to meet the criteria at the preliminary stage before being found not to meet them at the point of decision. The lack of clarity on this issue raises a potential question of procedural fairness, since consultation respondents would have had no reason to believe that they were commenting on an option the Government did not regard as viable.

- **The financial case.** The Leader notes that the joint financial assessment methodology – commissioned by all fourteen Kent and Medway councils specifically to allow comparison between options – assessed Option 1A as capable of delivering up to £538 million more than Option 4B over ten years, and Option 3A as capable of delivering up to £307.1 million more than Option 4B over the same period. The decision letter does not explain how this financial assessment was considered or what weight was attached to it in reaching the decision. The letter raises a further, more specific concern about the proposed East Kent authority, which will combine areas of significant coastal deprivation with correspondingly high demand for adult social care, children's social care and SEND provision. It asks what allowance was made for these pressures and for the unresolved question of how the leaving-care costs of unaccompanied asylum-seeking children will be allocated between the new authorities.
- **Border-related transport and highways resilience.** MHCLG's interim feedback letter of 15 May 2025 on the interim LGR plans acknowledged Kent's 'unique considerations' arising from the Short Straits crossings, the Channel Tunnel and the inland border facilities. It specifically asked all fourteen councils to demonstrate how these functions would be resolved under their proposed structures. The Leader notes that the decision letter makes no reference to this issue.
- **Unaccompanied asylum-seeking children.** The Leader welcomes the Secretary of State's recognition of the pressures that reorganisation creates in this area and his offer to work with councils on transitional arrangements. However, given that this issue was also flagged in MHCLG's May 2025 interim plan feedback and that the need for further work after the Secretary of State decision suggests that the implications were not, in fact, resolved before the decision was reached. The letter refers directly to KCC's experience following the High Court proceedings in this area and asks for confirmation of how the risk of returning to the circumstances that led to that litigation has been factored into the Government's planning for the transition.

2.2 As at the date of this report, MHCLG has provided no response to the 27 July letter, either formally or informally. A brief follow-up letter requesting a response was sent on 18 August.

2.3 KCC is not engaging directly with other county councils on the specific merits of any judicial review proceedings they may be considering. Each area's decision whether or not to seek judicial review would and must turn on the specific facts and reasoning used by the Secretary of State for that decision. A common approach would not be appropriate. KCC continues to engage through the County Councils Network (CCN) and the Association of County Chief Executives (ACCE) on the sector-wide political and operational response to LGR decisions, and on the shift in focus that all county councils now face moving from decision to implementation.

3. Options for Potential Challenge

3.1 Judicial review is potentially available against any decision of the Secretary of State under the Local Government and Public Involvement in Health Act 2007 (the legislation that underpins the Secretary of State's invitation for proposals of February 2025), and as with any such legal challenge, it would be based upon questions of lawfulness.

3.2 It is worth noting that judicial review is not an appeal against the **merits** of a decision. It is a challenge as to the **lawfulness** of the process by which a public body reached its decision.

3.3 A Judicial Review claim must be brought on one or more of three established grounds:

- **Illegality** means that the decision-maker misunderstood or misapplied the law, exceeded the powers conferred by statute, failed to take into account a matter that had to be considered, or took into account a matter that should not have been considered.
- **Irrationality** means that the decision was so unreasonable that no reasonable Secretary of State could have reached it.
- **Procedural impropriety** means that the process itself was unfair, for example through a breach of the Gunning principles where a duty to consult exists.

3.4 The remedies available to the Court if a claim succeeds are limited. Members should have no expectation that a successful challenge would result in the Court itself selecting Option 1A, or any other option, in place of Option 4B. The Court has no power to substitute its own judgment for that of the Secretary of State on a matter properly within the Secretary of State's discretion.

3.5 The principal remedy is a "quashing order" which sets the original decision aside and would require the Secretary of State to take the decision again, but in a lawful manner, correcting whatever procedural or legal issue had been identified. This could ultimately mean the very same decision being made, albeit lawfully. The Court may also grant a "declaration" clarifying the legal position but without formally quashing the decision. These remedies could all therefore potentially mean the very same outcome.

3.6 The Administration's position for KCC will be kept under review and will be considered further in light of the Secretary of State's response to the 27 July letter.

Legal advice was sought prior to sending the 27 July letter to the Secretary of State. The related cost has been met from existing approved budgets within the Chief Executive's Department. In the event of any further legal input being sought, then such related costs would require the allocation of further officer time and financial resources.

4. Maintaining Implementation Preparation

4.1 KCC's Administration accepts that preparations for implementing Option 4B must continue. Option 4B remains the decision that all fourteen councils in Kent and Medway must prepare to implement.

4.2 This is reflected in the governance arrangements already established for the LGR implementation programme. The County Council's Chief Executive is the Senior Responsible Officer for LGR implementation across Kent and Medway, a role that is deliberately separate from the Administration's political response to the Secretary of State's decision.

4.3 The SRO's duty is focussed on delivery, ensuring that the structures, systems and staff needed to stand up four functioning unitary authorities are ready in time. Continuing that delivery work does not constitute, and should not be read as, any form of acceptance on the concerns set out in Sections 2 and 3 above; it is a clear responsibility that exists whatever the outcome of the Administration's review of the LGR decision for Option 4B.

5. Recommendations:

5.1 Cabinet Committee is asked to:

- 1) Note the basis and rationale for the Secretary of State's decision to select Option 4B, as set out in Section 1.
- 2) Note the concerns raised in the Leader's letter of 27 July 2026, as set out in Section 2, and note that no substantive response from the Ministry of Housing, Communities and Local Government (MHCLG) has yet been received.
- 3) Note that the option of a potential legal challenge remains under review and that a related judicial review longstop date, should it become appropriate, would be by mid-October 2026, subject to the standard requirement to act promptly.
- 4) Note that implementation preparation must continue in parallel with any legal challenge, reflecting the Chief Executive's role as Senior Responsible Officer for LGR delivery across Kent and Medway as set out in Section 4.

Relevant Director & Report Author:

David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance – david.whittle@kent.gov.uk

Appendices:

- Appendix A: Leader of the Council's letter to the Secretary of State – 27 July 2026

Background Document:

Secretary of State's letter to all Leaders and Chief Executives in Kent and Medway – 16 July 2026 available at

https://assets.publishing.service.gov.uk/media/6a58d1d33ae256c99b702f05/Local_government_reorganisation_-_decision_letter_to_Kent_and_Medway_council_leaders.pdf



The Rt Hon Angela Rayner MP
Secretary of State
Ministry of Housing, Communities and Local Government

By email

Linden Kemkaran
Leader's Office
Sessions House
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Maidstone
Kent ME14 1XQ

Email: linden.kemkaran@kent.gov.uk

27 July 2026

Dear Secretary of State,

Re: Local Government Reorganisation Decision for Kent and Medway: Request for further Explanation and Information

On 16 July 2026, your predecessor, the Rt Hon Steve Reed MP, wrote to the leaders of Kent and Medway councils setting out his decision to select Option 4B for local government reorganisation in Kent and Medway, and the rationale for that decision. Having reflected on his letter and his statement in the House of Commons, I have serious concerns about the reasoning and process underpinning that decision.

Given we have a new Government under a new Prime Minister, it seems appropriate to ask whether, given the limited and uncertain financial benefits of reorganisation, the new Government is determined to press ahead with this policy for which there is little resident appetite, when money could be better spent providing essential services through existing structures. I do not understand how the Government can adopt a strategy of tackling the cost of the living crisis on the one hand, whilst on the other hand, drive forward a reorganisation policy the costs of which will clearly, and completely unnecessarily, lead to higher council tax bills for Kent residents.

Before turning to the specific areas on which I seek detailed explanation and information, I wish to address several statements made in the decision letter itself.

First, it was the Government itself that made clear that the indicative population threshold of 500,000 was not intended to be a target and that proposals should be assessed against the full range of criteria in the Statutory Invitation, rather than by reference to population size alone. The summary dismissal of Option 1A in the decision letter by reference to its proposed population size gives no indication that serious consideration was given to the significant benefits it offered in terms of financial resilience and service sustainability. This is particularly striking given the statement in the business case that 73% of local government services are delivered at countywide scale.

I also challenge the characterisation in the decision letter of the area assemblies proposed as part of Option 1A as an untested governance model. The Option 1A business case made clear that the proposed area assemblies would take the form of area committees exercising functions and powers delegated by the Leader of the Council. They therefore represented an extension of

an established governance model used by councils across England, rather than a wholly novel arrangement, and were intended to operate within the existing legislative framework for local authority governance.

Finally, I note that, in other LGR decisions, the then Secretary of State placed significant weight on the relative levels of council support for each option as an indicator of wider local support. I am therefore particularly surprised that the absence of broad consensus for any of the options submitted for Kent and Medway was not addressed in the decision letter. Option 4B was supported by only three of Kent's district councils, which together account for just 5% of Kent's total local authority expenditure. In my view, that level of support is wholly insufficient to justify the scale of the detrimental change that will now be imposed on the residents of Kent and Medway.

Beyond these points, I have more detailed and specific concerns about both the decision and the process by which it was reached. I would welcome a full explanation and the relevant supporting information on the matters set out below.

1. Appropriate and timely assessment of Option 1A against the criteria

In the decision letter, the Secretary of State explicitly stated that Option 1A did not meet the criteria set out in the Statutory Invitation of 5 February 2025. However, this directly contradicts the statement made by the Minister, Baroness Taylor, on the morning of 16 July, at the meeting convened to inform Kent and Medway council leaders of the decision. At that meeting, she stated that all proposals put forward in Kent and Medway had met the criteria.

The Government's consultation document on the LGR proposals for Kent and Medway, published on 5 February 2026, states:

"In order to enable an assessment of the councils' proposals to be made against the criteria in the statutory invitation, views are sought on all proposals that meet the terms of the invitation (i.e. where the proposals seek to achieve the invitation criteria and provide all the information specified in the guidance)."

In a letter to council leaders involved in Wave 2 of LGR - that is, areas outside the Devolution Priority Programme - sent by the then Minister of State, Alison McGovern, on 6 February 2026, ahead of the consultation process, she stated:

"While a preliminary assessment of all submissions has been conducted, we have not yet made any formal assessment against the invitation criteria. This will be completed once the consultation process has concluded, so that all evidence can be considered."

Option 1A was included in the consultation. Any individual or organisation responding to that consultation would reasonably have inferred that the Government considered Option 1A to have met the threshold required for consultation and that it was therefore a legitimate option which might be selected by the Secretary of State and subsequently implemented.

It is also reasonable to assume that most participants would have expected MHCLG's "preliminary assessment" to have determined whether a proposal met the criteria sufficiently to proceed to consultation. Otherwise, the purpose of including the proposal in the consultation is unclear, and its inclusion risks having been based on a false premise. The distinction drawn by Minister McGovern between a "preliminary assessment" and a subsequent "formal assessment" is unclear, particularly as it was not explained in the consultation document itself.

This raises serious concerns. In particular, the sequence of events suggests that a proposal deemed suitable to proceed to public consultation following a “preliminary assessment” may subsequently have been judged not to meet the relevant criteria at the “formal assessment” stage, even though the underlying facts of the proposal had not changed. This creates the appearance that Option 1A was retrospectively judged not to have met the criteria at the very point at which its merits were to be assessed comparatively alongside the competing proposals.

That would appear procedurally unfair. I would therefore be grateful if you could provide:

- 1.1 Confirmation of the date or dates, methodology and outcome of any “preliminary assessment” of Option 1A and each of the other Kent and Medway proposals conducted before the launch of the public consultation, including whether Option 1A was assessed at that stage as meeting the invitation criteria.
- 1.2 Please also confirm whether it was officials or Ministers that undertook or approved the preliminary assessment.
- 1.3 Clarification of the distinction drawn by Minister McGovern in her letter of 6 February 2026 between a “preliminary assessment” and a “formal assessment” against the invitation criteria, including the threshold that a proposal was required to meet to be included in the public consultation.
- 1.4 Details of any change in the evidence or the Government’s analysis between the point at which Option 1A was accepted for consultation and the point at which your decision letter determined that it did not meet the criteria.
- 1.5 Confirmation of whether officials or Ministers considered, when the consultation was launched, that Option 1A did not meet the invitation criteria and, if so, why respondents were not informed of that assessment before submitting their views.

2. Failure to explain how financial benefits were outweighed by other criteria

Since the commencement of the LGR process in February 2025, Ministers have consistently referred to LGR as a means of securing the future financial sustainability and resilience of local government.

In the decision letter, it states:

“I am satisfied, based on our assessment against the criteria, that my selected option is likely to generally represent an overall improvement in, or be similar to the sustainability of current structures. The single unitary proposal could be more likely to deliver savings but did not meet the criteria overall.”

The phrase “likely to generally represent an overall improvement in, or be similar to” is highly equivocal and provides little clarity about the improvement that Option 4B is expected to achieve. Given the fragile state of local government finances, the significant demand and cost pressures facing council services, and the centrality of financial resilience to the rationale on which the Government launched the LGR process, it is difficult to understand how an acceptable outcome could be that, after the seven-to-fourteen-year payback period for Option 4B, Kent and Medway may be left with a level of financial sustainability broadly similar to that of the current structure.

I have further concerns about the robustness of the financial assessment, particularly in relation to the proposed East Kent unitary authority. Our business case identified the need to manage significant disparities in socioeconomic conditions and service demand across the county as one of the principal arguments for a single Kent and Medway unitary authority.

The proposed East Kent authority would encompass areas of significant coastal deprivation and would face disproportionately high demand and cost pressures in adult social care, children's social care and special educational needs and disabilities compared with the other proposed unitary authorities. This could place it under severe financial strain from its first day of operation. That risk is compounded by the absence of an agreed approach to allocating the financial pressures associated with unaccompanied asylum-seeking children, particularly leaving-care costs. It is not clear that these costs were factored into the decision.

All councils across Kent and Medway recognised the importance of financial sustainability and resilience within the LGR process. Despite political differences and differing views about the most appropriate LGR solution for Kent and Medway, all authorities remained committed to developing their competing proposals using a shared financial assessment methodology. This was specifically requested by MHCLG in the Statutory Invitation and was intended to enable a genuine comparative analysis of the implementation costs, financial benefits and payback periods associated with each option.

The decision letter does not explain how the then Secretary of State considered, assessed or weighted the joint financial assessment submitted by all councils when determining the extent to which each proposal met the statutory criterion relating to financial resilience. Even setting aside the financial benefits associated with Option 1A - which the letter acknowledges could be significant, amounting to up to £538 million more over ten years than Option 4B - other options were also assessed as delivering greater financial benefit and resilience than Option 4B. Option 3A, for example, was assessed as capable of delivering up to £307.1 million more than Option 4B over ten years.

The failure to address meaningfully this material difference in financial benefit and resilience between Option 4B and the other proposals is a significant omission from the decision letter.

I would therefore be grateful if you could provide:

- 2.1 Confirmation of how the shared financial assessment methodology, developed jointly by all Kent and Medway councils at MHCLG's request, was used to evaluate the relative financial sustainability and resilience of each proposal, including Option 4B.
- 2.2 Copies of any analysis, modelling or advice, whether prepared internally or by external advisers, comparing the financial benefits and payback periods of Option 4B with those of the other proposals, including Options 1A and 3A.
- 2.3 Details of how "financial sustainability" and "financial benefit" were weighted against the other assessment criteria, including the relative significance attached to each criterion.
- 2.4 Clarification of what is meant by the statement that Option 4B is "likely to generally represent an overall improvement in, or be similar to, the sustainability of current structures", including whether this reflects a quantified assessment or a qualitative judgement and the analysis underpinning it.
- 2.5 Confirmation of whether the differential in financial benefit between Option 4B and Option 3A - up to £307.1 million over ten years, according to the joint financial assessment - was taken into account and, if so, how it was reconciled with the decision to select Option 4B
- 2.6 Copies of any assessment of the financial sustainability of the proposed East Kent unitary authority, including the assumptions made in relation to coastal deprivation, adult and children's social care, SEND and the allocation of UASC-related and leaving-care costs.

3. Expectation that border-related transport risks would be properly considered

On 15 May 2025, MHCLG wrote to all Kent and Medway councils to provide feedback on the interim proposals submitted by all 14 authorities in March 2025. That letter formally acknowledged that Kent's position creates "unique considerations for local government reorganisation".

It specifically referred to the Short Straits crossings, the Channel Tunnel and the inland border facilities, and asked councils to provide evidence explaining how border-related function - particularly highways resilience, emergency planning and freight management - could be maintained under different council configurations

Option 1A - the County Council's proposal for a single Kent and Medway unitary authority - was developed in part because of the need for these pressures to be managed at scale. Only an authority operating at countywide scale has the resilience required to respond effectively to fluctuating demand and the operational pressures that Kent's unique border responsibilities place on its transport infrastructure.

Despite the specific request contained in MHCLG's interim proposal feedback, the alternative proposals submitted by councils in Kent and Medway did not address, in any meaningful or substantive way, the concerns raised by the Department about how their proposed configurations would support the continuing management of border-related highways pressures and Operation Brock.

In light of this evidential gap, I remain extremely concerned that your decision letter makes no reference to the border-related pressures affecting Kent and Medway's highways network and provides no explanation of how those pressures were considered in reaching your decision on Option 4B.

Border-related pressure is a constant reality for Kent and Medway and regularly requires the mobilisation of significant resilience functions and services across KCC and its wider strategic partners. At the time of writing, Operation Brock is in operation to manage increased traffic associated with summer holiday demand through the Port of Dover and the Channel Tunnel. It affects a substantial part of the county and crosses the boundaries of multiple districts and future unitary authorities under the Option 4B configuration.

The omission leaves no clear account of whether, or how, this issue influenced your decision. Given the weight that the Government itself placed on the matter when providing its interim feedback in May 2025, the absence of any explanation represents a serious deficiency in the reasoning set out in your decision letter.

I would therefore be grateful if you could provide:

- 3.1 Confirmation of how, and by whom within Government, the evidence submitted by Kent and Medway councils in response to MHCLG's interim feedback letter of 15 May 2025 concerning border-related transport and highways resilience was assessed.
- 3.2 Copies of any assessment, analysis or advice considered in reaching your decision that addresses the management of border-related pressures - including Operation Brock, the Short Straits crossings, the Channel Tunnel and the inland border facilities -under the four-unitary model.
- 3.3 Confirmation of any meetings or engagement with Department for Transport or National Highways on border related highway pressures and LGR, including dates of any meetings and copies of any associated correspondence, minutes or papers.

- 3.4 Clarification of why the decision letter of 16 July 2026 contains no reference to border-related highways or transport resilience, given the specific request for evidence contained in MHCLG's letter of 15 May 2025.
- 3.5 Confirmation of whether any of the alternative proposals submitted by other Kent and Medway councils specifically addressed how border-related functions would be managed under their proposed configurations and, if so, details of that evidence.
- 3.6 Details of any contingency or transition planning undertaken by MHCLG for the continued operational management of Operation Brock and related cross-boundary highways functions during the shadow period and following vesting day under the selected structure.

4. Expectation that issues relating to unaccompanied asylum-seeking children would be properly considered

I welcome the importance you attach in your letter to the issue of unaccompanied asylum-seeking children and the additional pressures that this places on the County Council and any future unitary council configurations across Kent and Medway.

However, this issue was specifically raised in MHCLG's interim feedback to all Kent and Medway councils in its letter of 15 May 2025. As with the border-related functions referred to above, MHCLG asked councils to submit proposals explaining how services and statutory responsibilities relating to unaccompanied asylum-seeking children would be maintained under the different future unitary configurations.

Again, as with the border-related highways issue, the alternative LGR proposals submitted by the other councils in Kent and Medway did not explain in any meaningful or substantive way how the pressures associated with unaccompanied asylum-seeking children would be managed under their proposed configurations.

The County Council does not underestimate the difficulty of this issue. Since the High Court judgment, KCC has worked constructively with the Home Office and the Department for Education to develop operating arrangements that seek to protect the individuals to whom KCC owes statutory duties under the Children Act. We have also sought to work with the Home Office in a coordinated and effective manner to support the operation of the National Transfer Scheme.

While I welcome your offer for MHCLG to work with councils across Kent and Medway, particularly the County Council, to address this issue through LGR - both in developing the future arrangements and throughout the transition - the fact that further work is now required appears to acknowledge that the implications for unaccompanied asylum-seeking children have not yet been fully resolved or reflected in the decision to approve Option 4B.

I would therefore be grateful if you could provide:

- 4.1 Confirmation of the extent to which the impact of local government reorganisation on the National Transfer Scheme has been considered, including which government departments were involved in that assessment.
- 4.2 Copies of any modelling, risk assessments, operational analysis, options appraisals or other supporting evidence that informed MHCLG's conclusions regarding arrangements for unaccompanied asylum-seeking children under the proposed LGR structures.
- 4.3 Details of the assumptions underpinning any assessment of deliverability, including those relating to workforce, finance, safeguarding, commissioning and governance.

- 4.4 Information about the engagement that has taken place with the Department for Education and the Home Office, and how any concerns raised by those departments have been reflected in the Government's analysis.
- 4.5 Clarification of how continuity of the National Transfer Scheme would be maintained during transition and implementation, and the contingency arrangements considered should the proposed structures prove unworkable.
- 4.6 Specifically, please also explain how the operation of the National Transfer Scheme in other areas undergoing LGR has been factored into the analysis, to ensure that we do not return to the difficulties that preceded the litigation and placed Kent and the Government in an unlawful position.

Notwithstanding my concerns and the issues raised above, I also wish to respond positively to your offer to address some of these matters. I welcome your willingness to engage openly on issues relating to unaccompanied asylum-seeking children and ask that you extend that offer to the highways and infrastructure impacts arising from border-related pressures.

Kent County Council has long been the strategic authority responsible for these matters. We have developed considerable technical and operational expertise in managing and delivering these services at scale. We therefore believe that a range of potential solutions could be implemented to mitigate or manage the implications of LGR for these critical services, although many would require support from national government.

I would like to move as quickly as possible into constructive discussions with you and your officials about the practical steps that the Government can take to ensure service continuity and protect the vulnerable children and communities who rely on these services.

Yours sincerely,

A handwritten signature in dark ink, reading "Linden Kemkaran". The signature is written in a cursive, flowing style.

Linden Kemkaran
Leader of Kent County Council

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From: Linden Kemkaran, Leader
Amanda Beer, Chief Executive

To: **Devolution and Local Government Reorganisation Cabinet Committee, 08 September 2026**

Subject: **Update on the Kent and Medway LGR Programme**

Classification: **Unrestricted**

Summary:

This paper provides an update on the Kent and Medway Local Government Reorganisation Programme following the Government's decision on 16 July 2026 to proceed with Option 4B and establish four new unitary authorities across Kent and Medway. It summarises key national developments, progress made locally since the previous Committee update, the emerging programme governance and delivery arrangements, the expected Structural Changes Order timetable, including the proposed arrangements for voluntary and formal Joint Committees, and the next steps ahead of Vesting Day, 1 April 2028.

Recommendations

The Cabinet Committee is asked to:

1) Note and comment on the progress and next steps of the Kent and Medway LGR Programme.

1. Introduction

1.1 This paper provides an update on national Local Government Reorganisation (LGR) developments since the previous Cabinet Committee on 14 May 2026. This covers:

- National Developments Update
- Kent and Medway Programme Update:
 - Programme Structure
 - Programme Team and Strategic Partner
 - Finance
- Structural Changes Order Timeline
- Voluntary and Formal Joint Committees

2. National Developments Update

2.1 Since the last Cabinet Committee meeting on 14 May 2026, there has been a change in the ministerial team at the Ministry for Housing, Communities and Local Government (MHCLG) following the change of Prime Minister in July 2026. However, national policy direction remains clear, with the Government

continuing to identify Local Government Reorganisation (LGR) as a major part of its reform programme.

- 2.2 This continued policy commitment was demonstrated by Ministers progressing decisions on LGR proposals across the country in line with the national timetable. On 16 July 2026, the Government announced decisions for 13 of the 14 Tranche 3 areas, including its decision to proceed with Option 4B for Kent and Medway, which will establish four new unitary councils. The Government has confirmed that further consideration is continuing in respect of West Sussex, and Cambridgeshire and Peterborough, with additional correspondence and consultation activity undertaken in those areas.
- 2.3 MHCLG is also in the process of arranging 'LGR Kick-off' meetings with all areas, to update Leaders and Chief Executives on the next stages of the process and the Structural Changes Order (SCO), with Kent and Medway's taking place in September. We are also awaiting the development of a national assurance framework to support consistent oversight of programme readiness, risk and delivery across different government departments.
- 2.4 Taken together, the national position indicates continuity in policy intent despite ministerial changes, with increasing emphasis now being placed on implementation, assurance and transition and legislation through the SCO. For Kent and Medway, this reinforces the importance of maintaining momentum locally, aligning programme governance with emerging national policy, and ensuring that the programme is sufficiently developed to respond to MHCLG assurance requirements as they are confirmed.

3. Programme Update

- 3.1 Following the Ministerial decision in July 2026, the Kent and Medway LGR programme has moved from the Enhanced Discovery Phase into the Foundational Phase of implementation. As set out at the March Cabinet Committee, the Enhanced Discovery Phase enabled councils to undertake MHCLG preparatory activities, to develop a shared evidence base and progress priority areas of work ahead of the Government's decision. The focus of the programme has now shifted to mobilisation, implementation planning and delivery assurance, with a clear emphasis on achieving safe and legal transition on Vesting Day, 1 April 2028, for all four new unitary councils.
- 3.2 A programme structure has been developed by the Programme Director and Chief Executives to provide the governance, capacity and delivery arrangements required for the transition period. The structure draws on experience and lessons of areas that have previously undergone LGR and is designed to reflect the scale and complexity of reorganisation across Kent and Medway and combines democratic oversight, strategic officer leadership, dedicated programme management capacity, service-led delivery and external specialist strategic partner support.

- 3.3 Democratic oversight of the programme will operate through a combination of countywide and individual local authority arrangements. Voluntary Joint Committees are expected to provide early political oversight within each future unitary geography ahead of the formal statutory Joint Committees being established following the SCO coming into force, which is covered later in this report. Formal decision-making will remain with the existing councils, in accordance with their own constitutions and decision-making processes, until such time as statutory responsibilities transfer to the Shadow Authorities under the SCO.
- 3.4 Officer oversight will be provided through the Kent and Medway LGR Programme Board, whose membership will consist of the Senior Responsible Officer (SRO), Deputy Senior Responsible Officer (DSRO), Place Leads (Chief Executive / Senior Officer appointed to each new unitary area) Chief Executives, the Programme Director and relevant statutory representatives.
- 3.5 The primary delivery mechanisms for the programme will be the Theme Boards and Workstreams. Theme Boards will oversee the development of future service blueprints and Day 1 operating models, supported by specialist workstreams. The agreed Theme Boards will cover Adults, Children's, Environment and Place, Communities, Finance, Assets and Procurement, People, Governance and Democracy, and Digital, Data, Technology and ICT.
- 3.6 Workstreams have been identified beneath each Theme Board, which will undertake the detailed delivery activity, bringing together subject matter experts and senior officers to support transition. Workstreams will draw on the outputs from the Enhanced Discovery Phase, including Kent County Council's Service Complexity Assessments, Medway Service Workbooks, District Service Executive Summaries and Priority Activity Group outputs, to develop high-level service blueprints for Day 1 readiness. The mobilisation of Theme Boards and Workstreams is expected to take place over September.

Programme Team and Strategic Partner

- 3.7 The programme will be resourced through a hybrid model, combining the dedicated Kent and Medway LGR Programme Team, input from existing council staff and specialist strategic partner support. This approach is intended to provide the capacity and expertise needed to support delivery at pace, while ensuring that Theme Boards and Workstreams are informed by the knowledge and experience of officers from across all 14 councils.
- 3.8 The foundation Kent and Medway LGR Programme Team has now been established and is scaling up during August and September 2026. Senior Programme Managers, Senior Policy Managers and Programme and Project Officers have been recruited to provide dedicated capacity on behalf of all 14 current councils. The Programme Team, led by the Programme Director, will be responsible for maintaining programme oversight, coordinating activity across Theme Boards and workstreams, supporting evidence-based decision-making, and manage programme risks and dependencies.

- 3.9 As presented to the May Cabinet Committee, the programme is also being supported through the appointment of a Strategic Partner to provide specialist programme and delivery expertise through the next phases of implementation. The Strategic Partner role is intended to complement, rather than replace, council officer expertise by supporting programme planning, critical path analysis, assurance, service blueprinting, delivery support and readiness activity up until Vesting Day.

Finance

- 3.10 As set out at the March Cabinet Committee, Chief Executives have agreed to establish an LGR implementation reserve supported by an apportionment methodology developed by Kent Finance Officers Group (KFOG) for these costs. A Memorandum of Understanding (MoU) and letters of comfort have been signed by all Chief Executives to ensure that pre-implementation costs are managed consistently across all 14 councils with an equitable distribution between them.
- 3.11 On 16 July 2026, as part of the decisions for Tranche 3 areas, MHCLG confirmed that funding would be allocated to areas on a basis of £900,000 per new unitary authority. Kent and Medway will therefore receive £3.6 million for the financial year 2026/27. It is not anticipated that additional resource will be required from Kent and Medway Council budgets for 2026/27 financial year. Kent County Council will hold the programme funds on behalf of all 14 councils in accordance with the agreed MoU and supporting letters of comfort.
- 3.12 If no further funding from Government is forthcoming in the interim, remaining Pre-Vesting Day costs will need to be built into council budgets for 2027/28, in line with the agreed apportionment set out in the Memorandum of Understanding. The expected 2026/27 and 2027/28 programme expenditure profile will continue to be refined as the Strategic Partner support and programme requirements are confirmed. Arrangements for 2027/28 funding will need to be progressed through each authority's normal decision-making route, including budget-setting or specific key decisions where required.

4. Structural Changes Order

- 4.1 The Structural Changes Order (SCO) is the statutory instrument through which the Government gives legal effect to LGR. For Kent and Medway, the SCO will codify the Minister's decision to establish four new unitary authorities, provide for the transition and implementation arrangements, and set out the legal framework for the new authorities to be created, including arrangements for shadow authority elections, governance, and implementation leadership.
- 4.2 Following the Ministerial decision on 16 July 2026, MHCLG wrote to Kent and Medway on 20 July setting out the implementation arrangements that are expected to be included in the SCO. This included Joint Committee membership numbers, confirmation that Amanda Beer would be the Senior Responsible Officer for the Kent and Medway LGR Programme, and a further request for information to support drafting of the order. This included

confirmation of Returning Officers for the first elections to the shadow authorities, proposed warding arrangements for those elections, and proposals for the alignment of parish council elections with elections to the new unitary authorities. A single joint response was submitted to MHCLG on 17 August 2026, which provided all this information.

- 4.3 Alongside the 17 August response, Kent and Medway Chief Executives wrote to MHCLG requesting an amendment to the proposed Deputy Implementation Team Leader arrangements for North Kent. The letter explained that Leaders and Chief Executives had already reached a unanimous position that the programme should have a programme-wide Deputy Senior Responsible Officer, that Richard Hicks, Chief Executive of Medway Council, should fulfil that role, and that Place Leads for all four future unitary areas should be appointed through the locally agreed process rather than by specifying a particular postholder for North Kent. The letter emphasised the importance of preserving the locally agreed leadership arrangements and maintaining collective ownership across all councils during implementation. Confirmation from MHCLG on this proposed amendment is currently awaited.
- 4.4 Subject to MHCLG's drafting process, it is expected that the draft SCO will be shared with Kent and Medway in the autumn for fact checking and comment before progressing through legal checks and pre-legislative scrutiny. The current working assumption is that the SCO will be laid before Parliament before the parliamentary recess in December 2026. The parliamentary process expected to conclude in March 2027, after which the Order would come into force. This timetable remains critical, as it provides the legal foundation for the establishment of shadow authorities, the first elections in May 2027, and the transition to the new unitary authorities ahead of vesting day on 1 April 2028.

5. Voluntary and Formal Joint Committees

- 5.1 Joint Committees will be an important element of the democratic oversight arrangements during the transition to the four new unitary authorities. Their role will be to provide strategic and political oversight of the preparations for reorganisation within each future unitary geography, while operating as part of the single Kent and Medway LGR programme. Joint Committees are intended to support a safe and legal transition, maintain transparency through public meetings, and provide a structured route for member oversight ahead of the establishment of the Shadow Authorities.
- 5.2 Joint Committees will be required to meet within 14 days following the SCO comes into force. Therefore, it is recommended by MHCLG that voluntary arrangements are put in place ahead of the formal statutory Joint Committees. The purpose of the voluntary phase is to provide an early route for political oversight, enable preparatory work to begin, and ensure that the formal statutory Joint Committees are ready to operate effectively within the limited period between the SCO coming into force and the first Shadow Authority meetings following the May 2027 elections.

- 5.3 The voluntary Joint Committees are expected to mirror the formal Joint Committee arrangements, including membership, terms of reference, procedure rules, meeting frequency and work programme. This approach is intended to avoid a significant change in operating model when the SCO comes into force and to provide consistency across all four future unitary geographies. Councils are currently expected to take the necessary local decisions during September and early October, enabling the first voluntary Joint Committee meetings to take place in October 2026, where local governance timetables allow.
- 5.4 A standard suite of documents has been developed to support this process, including a common Terms of Reference and common Rules of Procedure. These documents are intended to be applied consistently across the four Joint Committees to avoid unnecessary variation in approach. Each council will, however, need to follow its own constitutional and decision-making requirements for establishing the voluntary arrangements and appointing its representatives.
- 5.5 The Joint Committees' priority work programme is expected to include oversight of transition planning, preparatory work for interim statutory officer appointments, the development of draft Shadow Authority constitutions and schemes of delegation, members' allowances, codes of conduct, Shadow Authority meeting schedules and support for Returning Officers in convening the first Shadow Authority meetings. These matters reflect the statutory and practical tasks that need to be completed before Shadow Authorities are able to take on formal responsibility following the May 2027 elections.

6. Next Steps and Timeline

- 6.1 The next phase of the Kent and Medway LGR Programme will move from mobilisation into structured implementation and transition delivery. During September and October 2026, the Programme Team will continue to scale up, with further programme management capacity brought into place to support coordination across the programme. Theme Boards and Workstreams will also be mobilised, with initial activity focused on confirming membership, agreeing priorities and ways of working, identifying key dependencies, and beginning the development of high-level service blueprints.
- 6.2 In parallel, work will continue with MHCLG on the development of the SCO and associated implementation arrangements. The immediate priorities will be to establish voluntary Joint Committees within each of the four future unitary geographies, progress the local decisions required to support those arrangements, and ensure that the programme is ready to respond to the draft SCO when it is shared for fact checking and comment. These actions support continued momentum, strengthen democratic oversight and help keep the programme aligned with the expected statutory timetable through to Shadow Authority elections in May 2027 and Vesting Day on 1 April 2028.

Recommendations

The Cabinet Committee is asked to:

1) Note and comment on the progress and next steps of the Kent and Medway LGR Programme.

Relevant Director:

Tim Woolmer, Programme Director, Kent and Medway LGR Programme –
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Report Authors:

Matt Mottram, Senior Policy Manager, Kent and Medway LGR Programme –
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Background documents:

Previous papers to the Devolution and LGR Cabinet Committee, available at:

May 2026:

<https://democracy.kent.gov.uk/ieListDocuments.aspx?CId=979&MId=9849&Ver=4>

March 2026:

<https://democracy.kent.gov.uk/ieListDocuments.aspx?CId=979&MId=9848&Ver=4>

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From: Linden Kemkaran, Leader
Amanda Beer, Chief Executive

To: Devolution and Local Government Reorganisation Cabinet
Committee, 8 September 2026

Subject: Devolution update

Classification: Unrestricted

Summary:

This paper provides an update on devolution in Kent and Medway. It summarises recent national announcements, including the Cabinet Office's 'Rewiring the State' Cabinet Statement and the forthcoming Devolution White Paper, sets out the case for a Mayoral Strategic Authority for Kent and Medway, describes the Government's known timescales, identifies the questions that remain unresolved, and explains how the work is being taken forward.

Recommendation:

The Cabinet Committee is asked to:

- (1) Note and comment on this update.
-

1. Introduction

1.1 The Secretary of State's announcement of 16 July 2026 set out the Government's intended structure for local government in Kent and Medway. The County Council has made its position on that announcement known separately, and matters arising from it remain the subject of continuing correspondence with the Ministry of Housing, Communities and Local Government (MHCLG).

1.2 The area's relationship with central government is a separate question, and one that has been materially reshaped by national policy developments over the summer. This paper provides the Committee with an update on those developments, on the Kent and Medway position, on the case for a Mayoral Strategic Authority, on the questions that remain unresolved, and on the work now in train.

2. The Kent and Medway position

2.1 On 12 February 2026 the Government wrote to all councils whose areas are not in receipt of devolution, inviting them to submit an Expression of Interest to form a non-mayoral Foundation Strategic Authority (FSA) by 20 March. The County Council did not initially submit an Expression of Interest in order to protect the integrity of its preferred reorganisation option, Option 1A, for a single unitary authority. The Council's judgement was that Option 1A could have secured many of the strategic advantages of a Strategic

Authority within a single accountable body. Following the announcement of 16 July, the administration confirmed to Government that its reserve position in relation to Option 1A no longer applied.

2.2 On 21 July 2026 the Leader wrote to the Minister to support and join the Expression of Interest submitted by the other councils in Kent and Medway on 20 March 2026. That letter is at Appendix A.

2.3 On 5 August 2026 the Leaders and Chief Executives of all fourteen councils in Kent and Medway wrote jointly to the Prime Minister, the First Secretary of State and relevant Ministers. The letter confirmed the area's shared support for a Mayoral Strategic Authority and proposed aligning its establishment with LGR, with both changes taking effect on 1 April 2028. That letter is at Appendix B. Civil servants have since confirmed that it satisfies the Government's request, made on 6 August, for a clear statement of local preference by the end of August.

2.4 This is the first time the area has reached a unanimous position on devolution, and it matters more now than it would have done a year ago. During the passage of the English Devolution and Community Empowerment Act 2026, the Government removed its powers to direct the creation of a Strategic Authority or to impose a mayor on an area. It retained only a reserve power to expand an existing Strategic Authority and committed not to use that power for four years after the Act became law. As a result, devolution now rests on local agreement rather than on ministerial direction.

3. 'Rewiring the State' and the Devolution White Paper

3.1 On 31 July the Cabinet Office published an initial blueprint for devolution, 'Rewiring the State'. This preceded the publication of a Devolution White Paper, which will be published alongside the Autumn Budget on 28 October, and a Fiscal Devolution Roadmap.

3.2 The core of 'Rewiring the State' returns to the principles set out in the 2024 Devolution White Paper. It restates the Government's ambition for every area in England to have, or to be in the process of establishing, a Strategic Authority by the end of 2027, with Strategic Authorities in place everywhere by the end of 2028.

3.3 The document confirms the Government's preference for the mayoral model, stating that it wants new Mayoral Strategic Authorities rolled out as soon as possible. This is reinforced by the mayoral premium attached to many of the devolved powers on offer. In a departure from recent devolution policy, areas will be able to start devolution with mayoral status rather than progressing first through the non-mayoral Foundation tier. The Foundation Strategic Authority remains available to areas that are not ready or do not wish to adopt a mayor.

3.4 'Rewiring the State' emphasises that devolution, and a place-based approach to economic policy, is a key driver of economic growth. It extends the devolution agenda to encompass public service reform, and trails wider devolved powers, notably fiscal powers:

- From 2028, Mayoral Strategic Authorities are expected to retain a share of Income Tax receipts to spend locally. Government has indicated that this would substitute for

existing central government grant rather than being additional to it. The distributional consequences, particularly for areas with lower income tax yields, are not yet clear and are expected to be addressed in the Fiscal Devolution Roadmap.

- From April 2027, mayors will be able to retain a proportion of business rates and will have powers to introduce an Overnight Visitor Levy. Whether to apply such a levy in Kent and Medway would be a local decision, subject to consultation.
- Mayors will be able to establish 'Good Growth Funds', modelled on the Greater Manchester Good Growth Fund, bringing together grant, loan and equity investment for housing, employment space, innovation schemes and enabling infrastructure.
- Control over funding for locally tailored technical and vocational routes for 16 to 19 year olds, and a power to procure and provide tailored and specialised support for the long-term unemployed.
- Government will explore whether arm's length body responsibilities and funding should be transferred to local leaders or returned to ministerial departments.

3.5 Government proposes to work with local government to develop a blueprint for the capacity and capabilities Strategic Authorities need, and a strategy for delivering it. This will include ensuring that Strategic Authorities have the right skills and expertise, with the potential for a programme of secondments from central government.

3.6 To drive the agenda the Prime Minister has created the Office for the Prime Minister and the Cabinet (OPMC) and 'No 10 North'. OPMC will oversee No 10 North, which is intended to be the driver of the UK's economy and a conduit to redistribute power and resources across the UK. Responsibility for local economic growth policy and devolution strategy has moved from MHCLG and HM Treasury to OPMC.

4. The case for a Mayoral Strategic Authority for Kent and Medway

4.1 Kent and Medway's devolution case rests on three characteristics that few other areas share: the scale of the economy, a settled devolution geography, and public services that already operate coterminously. The principal opportunities are as follows.

- **Economic growth:** devolution can secure long-term strategic capacity on economic growth. Given the size and scale of Kent and Medway, its proximity to London and its position as the country's gateway to Europe, there is significant opportunity to deliver economic growth through devolved governance, with an impact on the national economy as well as the local one.
- **Planning and infrastructure:** taken at a more strategic level, the area's approach to development and supporting infrastructure would deliver more inclusive and sustainable growth across Kent and Medway communities.
- **Transport:** devolved transport powers would enable Kent and Medway to optimise the delivery of transport systems across the Strategic Authority area, improving economic, social and health outcomes alongside growth and inward investment.

- **Skills and employment:** a Mayoral Strategic Authority would be well placed both to accelerate current activity and to use new powers to develop a joined-up skills system responsive to local and changing workforce needs.
- **Health:** a Mayoral Strategic Authority could accelerate health improvement, using the mayor's strategic oversight and convening powers to identify the actions with greatest impact and to ensure that all partners play their part in interventions spanning public services.
- **International gateway to the UK:** a closer and more agile relationship with Government would enable the county to make better use of its status as the international gateway to the UK, minimising the negative impacts on communities and ensuring that the benefits accrue locally as well as nationally, particularly around Kent's key ports of entry.
- **A strengthened voice with Ministers and Government:** increased representation alongside other devolved areas would ensure that the county's needs on issues of local and national importance are heard.
- **Greater fiscal and policy flexibilities:** Kent and Medway would benefit from the flexibilities provided to areas with devolution, which could be deployed to address outcomes where the area lags behind the rest of the South East and the UK.
- **Delivery of public services:** given the coterminous nature of public services in Kent and Medway, a Mayoral Strategic Authority offers the prospect of a programme of public service reform designed in Kent and Medway for the benefit of Kent and Medway.

Role of the directly elected mayor

4.2 As Government has argued, mayors are uniquely placed to align national, regional and local priorities and to tailor growth, investment and public services to local needs.

4.3 A directly elected mayor for Kent and Medway would:

- act as a strong partner to central government and the ultimate decision maker for Kent and Medway, with a general power to do anything that would promote social, economic and institutional innovation;
- provide a visible single point of accountability for residents, with a strong democratic mandate and a single strategic vision, working alongside the Strategic Authority and the unitary councils to instil a visible sense of civic pride and acting as a direct bridge between local and central government;
- provide a single voice for public service reform. A mayor combines a direct electoral mandate with convening authority across public service boundaries — a combination not otherwise available within the local government structure — together with a mandate to address economic and social disparities across and between the new Kent and Medway unitary councils, border issues, planning and infrastructure;

- play a powerful lobbying and advocacy role with central government and partners, including a seat on the Council of the Nations and Regions and a role in engaging Kent and Medway MPs on local issues;
- provide a central point of transparent accountability for residents and partners, raising the profile of the area nationally and internationally, and with greater autonomy to make bold and rapid decisions;
- act as a strategic convener and commissioner, with the ability to shape and develop markets at scale to secure best value for taxpayers and to influence partners including central government, and to act as an ambassador for Kent and Medway;
- act as a broker between local government and business, providing a single visible point of contact for the business community, a leadership role in the relationship with public and private sector partners, and a stronger position from which to respond to shocks to the local economy;
- act as a strategic place-shaper, developing an integrated economic, infrastructure and social framework with access to a wider range of housing and infrastructure powers.

Public service reform

4.4 Devolution would enable a Strategic Authority for Kent and Medway to secure more cohesive strategy, coordination, commissioning and delivery of public services, extending beyond the economic, transport and infrastructure focus of earlier devolution settlements.

4.5 To support this agenda, Government is proposing to expand the current ability for mayors to create deputy mayors with specific responsibility for key public services such as health, policing and skills; to introduce a place-based approach to budgeting, encouraging greater alignment and pooling of funding so that Strategic Authorities and constituent councils can invest jointly, particularly in preventative services, in a manner comparable to the 'Total Place' approach piloted in 2010; and to align key public service boundaries.

4.6 Unlike many other areas of the country, Kent and Medway's devolution geography is settled and nearly all key public services already operate on a coterminous basis across or within its boundaries. That is the area's distinctive advantage, and it is core to the case for mayoral devolution in the county.

5. Government timescales and processes

5.1 Government has said that the forthcoming Devolution White Paper will set out its devolution agenda in more detail, with a timetable for implementation; plans for legislation and for the devolution of new powers and functions; and the alignment of public service geographies. Because 'Rewiring the State' and previous announcements have widened the Devolution Framework — the schedule of powers and responsibilities available at each tier of Strategic Authority — an expanded Framework will need to be published and, as the powers in the existing Framework are legislated for in the English Devolution and Community Empowerment Act 2026, may require further legislation.

5.2 The known timescales are set out below:

August 2026	Government has written to areas without a Strategic Authority asking whether they wish to proceed with a mayoral or non-mayoral approach, seeking a clear statement of the local position and preference by the end of August. For areas where discussions are already under way, Government will begin these conversations immediately. Government will engage with existing non-mayoral Foundation Strategic Authorities on their thinking about a future mayoralty.
September 2026	MHCLG will hold a Leaders' Council meeting to discuss the devolution agenda. The current Leaders' Council comprises the leaders of national representative bodies only.
From September 2026	Government announcements on the next wave of Strategic Authorities.
28 October 2026	Autumn Budget, Fiscal Devolution Roadmap and Devolution White Paper published.
From April 2027	Mayoral fiscal devolution begins, with a share of business rates and powers to introduce an Overnight Visitor Levy.
May 2027	New wave of Strategic Authorities established, with new mayors elected in Cumbria and in Cheshire and Warrington.
May / June 2027	Next two-yearly Spending Review, confirming arrangements for retained Income Tax from April 2028.
End of 2027	Every area in England to have, or be in the process of establishing, a Strategic Authority.
1 April 2028	Proposed date for the establishment of the four new Kent and Medway unitary authorities and, if agreed, of the Kent and Medway Strategic Authority.
April 2028	Retained Income Tax for Mayoral Strategic Authorities introduced.
May 2028	Further wave of new mayors elected, including in the Devolution Priority Programme areas.
End of 2028	All of England to have Strategic Authorities in place.

5.3 Ahead of the White Paper, several devolution-related developments are in progress. The Devolution Priority Programme areas - Norfolk and Suffolk, Essex, and East and West Sussex - continue to prepare for their new Strategic Authorities and for mayoral elections in May 2028. The Devolution Priority Programme area of Hampshire has

launched the Hampshire and Solent Combined County Authority. Surrey's two new unitary councils are set to form a Foundation Strategic Authority from 1 April 2027.

6. Unresolved questions

6.1 A number of questions bear directly on the process and timetable for establishing a Strategic Authority and remain the subject of continuing discussion with Government:

- Which authorities must formally consent to the creation of a Strategic Authority. The previous Government's position was that consent would come from the new unitary authorities rather than from the existing upper-tier authorities. Civil servants have separately advised that the lead-in time required to create a Strategic Authority through secondary legislation is approximately twelve months. Those two positions are difficult to reconcile with establishment on 1 April 2028.
- Who will undertake the public consultation required before consent decisions can be taken. The previous Government indicated that this was a local responsibility, but Government has since agreed to take responsibility for the Surrey Foundation Strategic Authority consultation.
- Whether the Devolution Framework will be updated to reflect the bespoke powers already granted to existing Mayoral Strategic Authorities, or whether the offer will remain uniform with bespoke arrangements unique to particular areas.
- The full timescales and process Government intends for the roll-out of new Mayoral and Foundation Strategic Authorities.
- When Government will begin engagement with the sector on the capacity and capability blueprint, and how the enhanced programme of secondments from the civil service will operate.

6.2 Beyond these process questions, the full suite of powers available to a Mayoral Strategic Authority will not be known until the Devolution White Paper is published on 28 October. Any position taken before then is taken with incomplete information. That is a real limitation, and it is the principal reason the work described in the following section is proceeding at risk.

7. Taking Devolution Forward

7.1 Devolution sits as a workstream within the Kent and Medway LGR programme and follows its governance arrangements. The Devolution Priority Activity Group (DPAG), jointly led by the County Council's Director of Strategy and Policy and Medway Council's Director of Place, and including the Chief Executives of Ashford Borough Council, Folkestone and Hythe District Council and Gravesham Borough Council, acts as the strategic steering group. DPAG reports to the Kent and Medway LGR Programme Board, and the work is subject to political oversight by Joint Kent Leaders.

7.2 Given the pace Government has set and this area's ambition to secure a settlement quickly, it is not realistic to await ministerial confirmation before beginning the work

required to establish a Mayoral Strategic Authority. Key elements will therefore proceed on immediately, meaning that officer time and, where necessary, commissioned resource will be committed before Ministers have confirmed either that a Mayoral Strategic Authority for Kent and Medway will be supported. Nonetheless proceeding now signals the seriousness of all fourteen councils' intent whilst supporting the ambition for a Strategic Authority to be in place for 1 April 2028.

8. Recommendations

8.1 The Cabinet Committee is asked to:

(1) Note and comment on this update.

Relevant Director:

David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance - david.whittle@kent.gov.uk

Report Authors:

David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance - david.whittle@kent.gov.uk

Edward Thomas, Policy and Strategy Adviser, SPRCA – edward.thomas@kent.gov.uk

Appendices

Appendix A - County Council letter joining the Expression of Interest for a Foundation Strategic Authority for Kent and Medway, 21 July 2026.

Appendix B - Kent and Medway Leaders' and Chief Executives' letter to the Prime Minister supporting a Mayoral Strategic Authority, 5 August 2026.

Background documents

'Rewiring the State', Cabinet Statement, Cabinet Office, 31 July 2026.

English Devolution White Paper: Power and Partnership, Foundations for Growth, MHCLG, December 2024.



Nesil Caliskan MP
Parliamentary Under-Secretary of State
Minister for Devolution, Local Growth and Communities

By email

Linden Kemkaran
Leader's Office
Sessions House
County Hall
Maidstone
Kent ME14 1XQ

Email: linden.kemkaran@kent.gov.uk

21 July 2026

Dear Minister,

Re: KCC expression of interest in establishing a Foundation Strategic Authority for Kent and Medway

On 11 March 2026, I wrote to your immediate predecessor, Miatta Fahnbulleh MP, following the invitation issued by her and Matthew Pennycook MP on 12 February 2026 for expressions of interest in establishing Foundation Strategic Authorities in areas outside the Devolution Priority Programme (DPP).

At that point, Kent County Council decided that it would not be right to support an expression of interest while the Government was still considering proposals for local government reorganisation in Kent and Medway.

That decision was necessary and right at the time. It was a direct response to the uncertainty created by the Government's changing position on the relationship between LGR and FSAs outside the DPP. Councils were asked to produce major reorganisation proposals without a clear or settled timetable for when devolution would be offered.

KCC had to protect the integrity of its own proposal while Ministers decided what LGR structure they wanted. Our position did not prevent any other council from acting. The other 13 councils in Kent and Medway submitted an expression of interest on 20 March 2026.

Throughout this process, KCC has remained clear that Kent and Medway should secure the greatest possible devolution of powers, responsibilities and funding. KCC has always supported strong strategic leadership across the whole of Kent and Medway.

Our Option 1A proposal made that clear. It set out a single unitary authority for Kent and Medway because there was no accepted approach for delivering devolution, either as an FSA, mayoral strategic authority or any other body able to provide one clear voice or oversee the strategic functions that need to be managed across the whole area.

Kent and Medway need strong countywide leadership, joined-up decision-making and a single, credible voice to Government. That was the purpose of Option 1A, and it is also the case for an FSA.

I have now considered the Secretary of State's decision on local government reorganisation in Kent and Medway, announced in the House of Commons on 16 July. I remain disappointed by that decision. However, it now gives us a clearer basis on which to move forward.

KCC will pursue any concerns about the LGR decision through the appropriate channels. Those concerns should not hold up now making fast progress on delivering devolution.

Work on an FSA should now begin without delay. Kent and Medway need the maximum powers and funding available from Government. After LGR, the area will also need a strong strategic body that can represent residents and businesses, coordinate activity across council boundaries and speak to Government with authority.

An FSA is the necessary first step. It should be developed alongside LGR, not be considered an afterthought. Delivering both an FSA and LGR together would allow the new system to be designed properly from the start. It would also avoid the disruption of breaking up strategic services and functions between new unitary councils, only to bring them back together again later.

KCC is therefore ready to support the establishment of an FSA for Kent and Medway. Please treat this letter as formal confirmation that KCC endorses the expression of interest submitted by the other 13 councils on 20 March 2026 and joins them in seeking early, serious and substantive engagement with the Government.

I hope the Government can respond positively and move quickly to support the establishment of an FSA for the whole of Kent and Medway and give the county the powers, resources and strategic voice it needs.

Yours sincerely,



Linden Kemkaran
Leader of Kent County Council

Cc:

The Rt. Hon. Angela Rayner MP, Secretary of State for Housing, Communities and Local Government

Matthew Pennycook MP, Minister of State for Housing and Planning

By Email:

Rt Hon Andy Burnham MP

Prime Minister

andy.burnham.mp@parliament.uk

jo.platt.mp@parliament.uk

The Rt Hon Louise Haigh MP

First Secretary of State, Chancellor of the
Duchy of Lancaster, and Minister for the
Cabinet Office

louise.haigh.mp@parliament.uk

Rt Hon Angela Rayner MP

Secretary of State for Housing, Communities
and Local Government

angela.rayner.mp@parliament.uk

Rt Hon Jim McMahon OBE MP

Under-Secretary of State for the Ministry of
Housing, Communities and Local Government

jim.mcmahon.mp@parliament.uk

Ministerial.Correspondence@communities.gov.uk

Kent Council Leaders

c/o Strategic Partnerships Team
Sessions House
County Hall
Maidstone
Kent ME14 1XQ

Phone: 03000 410261

Ask for: Carol Cook

Email: kentcouncilleaders@kent.gov.uk

5 August 2026

Ref: KCL/Devo

Dear Prime Minister,

The time for devolution in Kent and Medway is now

As you will be aware, securing devolution and the creation of a Mayoral Strategic Authority for Kent and Medway is an ambition that unites council leaders in Kent and Medway from right across the political spectrum because we can instantly see the benefits it will bring for the people we serve as well as the country more generally.

We strongly believe our case is compelling:

- We were collectively determined to make progress on Local Government Reorganisation when the previous government stated on 5th February 2025 that the current size disparity between the two upper tier authorities were the barrier to us being part of the Devolution Priority Programme. With the LGR decision now concluded that barrier has been overcome.

- We have a long tradition of working together at political and officer levels to deliver the best possible services – the groundwork is already in place.
- We already have a comprehensive plan for growth – important both for Kent and Medway’s economy and the country as a whole.
- We need to tackle the unique challenges that come from being the gateway to Europe including managing our border and the infrastructure that comes with it as well as looking after unaccompanied asylum-seeking children.
- We have a very clear idea of what a strategic authority could deliver including:
 - improved transport and critical national infrastructure around Kent’s key ports of entry
 - economic development and regeneration including the Local Growth Plan
 - delivery of our Spatial Development Strategy
 - skills and job creation
 - public service reform including strategic collaboration with the health service and taking on the work of the Police and Crime Commissioner whose office is being abolished.

Our neighbouring areas have either already secured devolution agreements or have been accepted onto the Devolution Priority Programme.

As a result, Kent and Medway risk falling behind. Without devolution, we will be unable to access the opportunities and significant service investment that accompany these arrangements, while neighbouring regions are positioned to benefit from them.

Above all, we share your view that decisions about local priorities are best made by local leaders, who are closest to their communities and best placed to direct investment towards the projects and infrastructure that will deliver the greatest benefits for their areas. Ultimately, we all want to see good growth in every postcode.

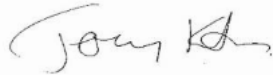
We are working hard to prepare for local government reorganisation while maintaining services. Devolution is a key piece of the jigsaw, enabling effective local decision-making and supporting a streamlined reorganisation process. For us, it makes perfect sense to align the establishment of a Mayoral Strategic Authority for Kent and Medway with Local Government Reorganisation, with both taking effect on 1 April 2028, so that the necessary changes only need to be implemented once.

We would welcome the opportunity to discuss this with you or your senior civil servants at your earliest convenience.

Yours sincerely,



Noel Ovenden
Leader, Ashford Borough Council



Jeremy Kite MBE
Leader, Dartford Borough Council



Jim Martin
Leader, Folkestone & Hythe District Council



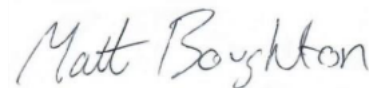
Linden Kemkaran
Leader, Kent County Council



Vince Maple
Leader, Medway Council



Tim Gibson
Leader, Swale Borough Council



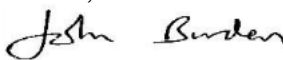
Matt Boughton
Leader, Tonbridge & Malling Borough Council



Alan Baldock
Leader, Canterbury City Council



Kevin Mills
Leader, Dover District Council



John Burden
Leader, Gravesham Borough Council



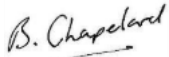
Stuart Jeffery
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Kevin Maskell
Leader, Sevenoaks District Council



Rick Everitt
Leader, Thanet District Council



Ben Chapelard
Leader, Tunbridge Wells Borough Council



Tracey Kerly
Chief Executive, Ashford Borough Council



Suzi Wakeham
Joint Chief Executive, Canterbury City Council



Peter Davies
Joint Chief Executive, Canterbury City Council



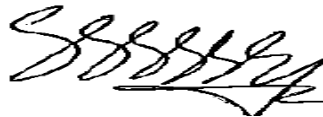
Sarah Martin
Chief Executive, Dartford Borough Council



Nadeem Aziz
Chief Executive, Dover District Council



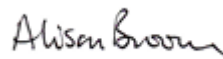
Dr Susan Priest
Chief Executive, Folkestone & Hythe District Council



Stuart Bobby
Chief Executive, Gravesham Borough Council



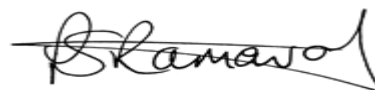
Amanda Beer
Chief Executive, Kent County Council



Alison Broom
Chief Executive, Maidstone Borough Council



Richard Hicks
Chief Executive, Medway Council



Dr Pav Ramewal
Chief Executive, Sevenoaks District Council



Larissa Reed
Chief Executive, Swale Borough Council



Colin Carmichael
Chief Executive, Thanet District Council



Damian Roberts
Chief Executive, Tonbridge & Malling Borough Council



William Benson
Chief Executive, Tunbridge Wells Borough Council

From: Linden Kemkaran, Leader of the Council
Amanda Beer, Chief Executive Officer

To: Devolution and Local Government Reorganisation Cabinet Committee

Date: 08 September 2026

Subject: KCC Risk Update

Classification: **Unrestricted**

Past Pathway of Paper: None

Future Pathway of Paper: None

Electoral Division: All

Summary:

This paper presents the latest version of the KCC corporate risk relating to local government reorganisation (LGR), as well as an interim KCC risk register for LGR. Links to pre-existing organisational risks are also outlined.

Recommendation(s):

The Cabinet Committee is asked to **CONSIDER**, **COMMENT** and **NOTE** the risks presented.

1. Introduction

- 1.1 This Committee provides a dedicated space for discussion regarding the Local Government Reorganisation (LGR) process in Kent and Medway, including implications from a KCC perspective. A draft corporate risk was presented to this Committee in March, giving a high-level overview of key risks from KCC's perspective, with an acknowledgment that the LGR risks would need to be covered in more detail going forward. The latest version of this corporate risk is attached at appendix 1.
- 1.2 Now that the ministerial decision has been made and option 4b selected, an interim LGR risk register has been developed, highlighting a number of significant risks identified so far from KCC's perspective. The register has been derived from a variety of sources, including KCC officers through the Risk and Delivery Assurance Team's engagement with them; outputs from the Service Complexity Assessment

work; as well as scanning of risks highlighted by other areas also going through the LGR process.

- 1.3 The register is interim in its nature. As implementation progresses, interdependencies with day-to-day service risks will be brought out, which will lead to an integration into KCC's mainstream risk registers at corporate, directorate and divisional / service level up until Vesting Day. Those overseeing delivery of services will play a critical role in helping to clarify the risks that feed into the relevant risk registers. The central Risk & Delivery Assurance function will oversee and report on risks relating to LGR regularly, highlighting trends and patterns as the picture evolves.
- 1.4 The risks have been assigned indicative High / Medium / Low ratings rather than more detailed assessments of likelihood and impact at this stage. This is because the level of risk and risk responses may be affected by decisions not yet taken, or where further information is required. This position can be reviewed after the initial round of service design discussions.
- 1.5 The risks in the interim LGR register are those that are KCC's responsibility to mitigate through the LGR process, or at least until Joint Committees are formed, depending on the nature of any decisions required to mitigate risks.

2. Impact on existing KCC Corporate Risk Register

- 2.1. The LGR implementation process will have various impacts on KCC's existing corporate risk profile. The Corporate Risk Register, while being updated as and when significant changes occur, is subject to a more formal annual refresh each autumn. During the upcoming refresh, a key theme during conversations with Corporate Management Team and Cabinet Members will be whether or how LGR may be, or is, impacting on the existing risks, as well as any new risks or opportunities being introduced.
- 2.2 One pertinent example relates to the existing corporate risk relating to capacity and capability of the workforce. Cross-referencing to the interim LGR risk register highlights leadership and management capacity as a key risk, as well as recruitment and retention concerns, both of which need to be factored into future assessments of this risk.

3. Recommendation

Recommendation:

The Devolution and Local Government Reorganisation Cabinet Committee is asked to **CONSIDER, COMMENT** and **NOTE** on the draft corporate risks presented.

Contact details:

Report Author:

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Mark.scrivener@kent.gov.uk

Relevant Director:

David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance
David.whittle@kent.gov.uk

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APPENDIX 1 – KCC Corporate LGR Risk

Risk ID CRR0069 Implementation of Local Government Reorganisation (LGR)					
Source / Cause of risk	Risk Event (s)	Consequences (s)	Risk Owner	Current Likelihood	Current Impact
On the 16 th July 2026, the government announced its decision on the future structure of local government in Kent and Medway, which will see all existing councils abolished and replaced by 4 unitary councils (Option 4B) from 1 April 2028.	Insufficient capacity to deliver the transition within available resources and to time, alongside: -Delivery of KCC's Medium Term Financial Plan -Ensuring service continuity and quality -Supporting the joint LGR programme -Delivering other transformation e.g. SEND reforms	Quality of KCC service delivery impacted ahead of vesting day of successor authorities. Continuity of services impacted, before or during transition. Further strain on KCC finances.	Amanda Beer, Chief Executive Officer	Possible (3)	Major (5)
The chosen option involves disaggregation of countywide services such as social care and highways, with recognised safety, service quality and resilience and financial concerns, and vulnerabilities inherent in any mitigating structures proposed (such as social care partnerships). There are particular concerns around how EU border-related pressures in Kent can be managed when key services are disaggregated, including managing the arrival of UAS children and traffic management, which require countywide coordination and scale.	Disagreement regarding future service design of new local government structures e.g. shared services within the timescales required to allow delivery of transition by Vesting Day.			Target Residual Likelihood Unlikely (2)	Target Residual Impact Major (5)
LGR preparation is happening while there are continued financial and operating challenges for KCC					

and the local government sector (see CRR0009), and Government has stated that funding to support LGR must be found at local level.

The timescales for implementation are ambitious for change of such scale and complexity and there is a significant dependency on the form of the Structural Changes Order (SCO), the implementation of which will now not be until early 2027, adding additional pressure to implementation timelines.

The KCC Head of Paid Service is the Implementation Team Leader for the area, leading the joint implementation programme with Kent and Medway councils, adding to capacity pressures.

Existing councils will not technically be decision makers for future service design and structures, this responsibility falls to the successor, unitary authority/ies, with a role for Joint Committees to recommend changes before they dissolve ahead of shadow unitary elections.

Control Title	Control Owner
Continued commitment from KCC to be open, pro-active and transparent while working with partner authorities as the LGR process evolves.	Amanda Beer, Chief Executive Officer.
KCC contribution to joint LGR programme to ensure key information required for LGR is readily accessible when required and of good quality e.g. asset registers.	Corporate Management Team
Coordinated implementation planning within KCC e.g. Service Complexity Assessment work to provide an evidence base for service design conversations and highlight key considerations and challenges.	David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance
Strategic Partner appointed to provide capacity and expertise where required.	Tim Woolmer, LGR Programme Director
Prioritisation of KCC change activity in light of LGR, mindful of capacity concerns.	Corporate Management Team
Continued commitment from KCC for a single Kent & Medway implementation programme	Amanda Beer, Chief Executive Officer
Regular intelligence gathering and monitoring of developments in Surrey and Devolution Priority Programme areas.	David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance
LGR funding requirement considerations are being built into the 2027/28 budget setting process.	Dave Shipton, Head of Financial Strategy and Planning

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APPENDIX 2: KCC Local Government Reorganisation Interim Risk Register

RISK	MITIGATION	Indicative rating (High / Medium / Low)
Workforce: Leadership and management capacity is overstretched, with expectations to ensure services continue to run effectively for residents within financial constraints, while preparing for safe and legal transition of services for Vesting Day and delivering pre-existing change and other essential reforms required by Government. Continuity and / or quality of KCC services is impacted by the “distraction” of LGR.	Strategic Partner commissioned. While this is for the joint programme, it will in part aid KCC capacity and provide expertise where necessary in targeted areas. Prioritisation of existing KCC change activity to see what can be stopped or not started.	H
Service Design: Disaggregation risk – risk of failure to appropriately plan and prepare key KCC services for safe transition on Vesting Day. Potential for loss of accountability for decision-making, safeguarding risks, and failure to meet statutory timescales. Fragmentation of oversight during transition and beyond.	-Service Complexity Assessments conducted to provide a starting point for joint implementation and service design work, based on the information provided. Analysis of disaggregation complexity conducted, with potential consequences highlighted and recommended actions and next steps outlined. -Awareness of any relevant Government guidance. -Sharing of intelligence with other local authorities. -Phased disaggregation or temporary shared arrangement if needed (although decisions not in KCC’s gift)	H

Service Design: Risk that services are required to be disaggregated and then reaggregated if there is no Strategic Authority status for Kent by Vesting Day.	-Mitigation suggestion to hold services as a shared service until the Strategic Authority is formed.	TBC
Communications: Lack of understanding amongst staff regarding the LGR process and its implications, leading to confusion or statements made based on assumptions rather than fact.	Regular briefings to senior managers and responsibility to cascade key messages. Dedicated area for LGR on KCC's intranet site for sharing of the latest information.	M
Workforce: Staffing recruitment and retention. Risk that due to uncertainty, staff look take up posts in authorities that are not involved in current LGR processes; which have already been through them and are recruiting for permanent posts; or move out of the local government sector entirely. Recruitment to key roles is impacted by LGR.	Clear messaging on the LGR process and communicate the local approach to staff transfer to successor authorities as soon as decided. Highlight potential opportunities arising for staff.	M
Workforce: Potential for impacts on morale (positive or negative) and wellbeing due to the uncertainty over future arrangements and job security. Potential for some staff to disengage if they are looking to exit at some point during the transition process.	-Close monitoring of key data sets e.g. Staff survey results, absence data. -Monitoring of qualitative feedback e.g. escalation through management chains of aggregated impacts across teams.	M
Financial: In-year (2026-27) funding from government grant does not materialise. KCC (with other councils) have to make up the shortfall.		Low

Financial: Joint programme costs escalate beyond government grant and KCC (with other councils) have to make up the shortfall. Use of reserves or borrowing to meet the costs to cover KCC share of implementation costs.	To be taken into consideration as part of the 2027/28 budget setting process.	TBC
Financial: Risk that delivery of savings for 2027/28 are impacted by LGR, with a number of savings options requiring decisions by Joint Committees / shadow authority representatives from early 2027 onwards.	Risk to be taken into consideration during 2027/28 budget setting process.	TBC
Information Governance: Risk that due to significant information sharing, data analysis, system transition and movement of records between organisations, there is the risk of unauthorised access, inappropriate disclosure, data loss, poor data quality, cyber vulnerabilities or failure to comply with data protection legislation. This could lead to safeguarding failures, service disruption, legal challenge, regulatory action, financial penalties and reputational damage	Ensuring existing controls remain effective, as well as close working with partners on data protection and information security matters building up to, and during transition. Identification of critical systems, datasets and interfaces that support service delivery and statutory functions. Agreement of future approaches to system ownership, access, data migration, governance and ongoing support arrangements that maintains continuity of service Determine where shared systems, records and information-sharing arrangements will need to continue across organisational boundaries.	M

Assets: Risk of fragmentation of assets (some specialist and not evenly distributed across the county) that currently support countywide delivery models. Opportunities to use combined county and district asset portfolios.	Clear mapping of KCC assets to share, including identifying which assets are critical to future service models and resilience: aligning asset decisions with service design, transformation and investment priorities; and determining where shared, strategic or cross-boundary asset arrangements are needed.	TBC
Governance and Decision Making: Risk that Joint Committees do not function effectively, impacting on decision making relating to future service design of KCC services, as Joint Committees are the primary route to democratic accountability.		TBC
Contracts: Countywide, long-term and complex contracts and frameworks are common Transformation is ‘LGR-proofing’ some new contracts, but there are risks where end dates fall around vesting day and there needs to be careful management of complex novation.	Agreeing a corporate approach to transitional commissioning and novation; identifying where joint or transitional arrangements are needed to maintain continuity; and ensuring service design is informed by market capacity and market-shaping requirements.	TBC

From: Linden Kemkaran, Leader
Amanda Beer, Chief Executive

To: **Devolution and Local Government Reorganisation Cabinet Committee, 8 September 2026**

Subject: Service Complexity Assessment (SCA) findings

Classification: **Unrestricted**

Summary:

Kent County Council has assessed 167 of its services to understand the complexities involved in disaggregation to new unitary councils through LGR. Disaggregation is the default position in law where multiple unitary authorities are created and means splitting a service currently delivered once across the whole county into separate services for each new council.

The assessments found that 130 services (79%) could be disaggregated with no structural barrier identified. For 24 services (14%) a structural barrier affecting the whole service was identified, and for a further 11 services (7%) a barrier affecting part of the service. For 27 of these 35 services, the indicative alternative is some form of continued countywide arrangement.

No decisions have been taken as a result of this work. Decisions on how services will be delivered in the new councils will be taken by the shadow authorities following their election in May 2027. This assessment provides the evidence base to inform those decisions and to ensure KCC can hand its services over safely and lawfully.

This report builds on previous reports to the Committee in March 2026, which set out the methodology and approach, and May 2026, which provided a progress update. It sets out what the assessment covered, what it found, what the findings mean for implementation planning, and the proposed next steps. A description of how the assessment was undertaken is at Annex A and a glossary of terms at Annex B. One-page summaries for each service assessed are at Appendix A.

Recommendation:

The Cabinet Committee is asked to:

- (1) **Note** and **comment** on the findings of the Service Complexity Assessments
-

1. What the Service Complexity Assessment process is and is not

- 1.1. Service disaggregation represents one of the most significant implementation challenges for KCC's services associated with Local Government Reorganisation (LGR). National legislation establishes disaggregation as the default position for new authorities, but there is limited precedent and guidance on how large county council services should transition through the process.

The Service Complexity Assessment (SCA) process was therefore developed as an evidence-based approach to improve understanding of service complexity in relation to disaggregation, and to support KCC's preparation for implementation through the joint Kent and Medway LGR Programme.

- 1.2. The process focused on understanding the complexity of service disaggregation, identifying implementation risks and considerations, and highlighting issues requiring further discussion through the next phase of the joint programme. It provides a starting point from KCC's perspective for those joint discussions, based on the evidence available at the time the process was undertaken.
- 1.3. No decisions have been made as a result of the findings of the SCA process. Decisions on how services will operate in the new unitary councils will be taken by the shadow authorities following their election in May 2027.
- 1.4. The scope of the process is summarised in Table 1 below.

Table 1: Scope of the SCA process

The SCA process does...	The SCA process does not...
Provide KCC's starting point for joint implementation and service design work, based on the information provided	Provide the final position - further analysis, ongoing transformation and future decisions will change the picture
Analyse disaggregation complexity and identify where a structural barrier to disaggregation exists	Consider aggregation in detail. This assessment covers KCC services; the district and borough councils and Medway are undertaking their own preparation work, and the findings will be brought together through the joint programme
Flag potential consequences, risks and trade-offs of disaggregation that need to be considered in service design	Determine future service design
Identify interdependencies and where end-to-end service user pathways need to be considered in service design	Provide detailed pathway mapping
Pose questions for now, next and future to support implementation thinking	Attempt to answer them. Some questions can only be resolved jointly, or by the future authorities

1.5. Services covered

Corporate Management Team agreed that KCC's internal preparatory activity during the Enhanced Discovery Phase, before the Government decision on the future LGR model, should initially focus on resident-facing services, as this is where the greatest potential risk to service delivery for residents lies. The process therefore covered all services in Adult Social Care and Health and Public Health, Children, Young People and Education, and Growth,

Environment and Transport, together with selected resident-facing services within the Chief Executive's Department and Deputy Chief Executive's Department. Remaining corporate and enabling services will be considered through the joint LGR Implementation Programme.

1.6. **Assurance and audit**

As part of its wider embedded assurance work relating to Local Government Reorganisation, Internal Audit undertook an initial review of the SCA process. The review found the process to be robust and reasonable in design, providing an effective evidence base to support future implementation planning. Internal Audit gave an overall opinion of Substantial Assurance, with Good prospects for improvement, and identified no formal management actions. This was reported to Governance and Audit Committee on 23 July 2026.

1.7. **Communication with staff**

Strategy and Policy has worked closely with the Staff Communications team throughout the process, communicating through tailored messages to participating service leads, to managers and to all staff. The aim has been to help staff understand the purpose of the process and what it means for them and their service, and to be clear that it is not a decision-making process. Messages have gone to all staff in advance of the publication of these papers. Because this report and the appended one-page summaries name individual services, further messaging will be issued alongside publication, and future communications about how the findings are used will form part of planned and coordinated staff communications on LGR.

2. **What the assessment found**

2.1. **Assessment overview**

The process assessed 167 services. Of these, 130 (78%) were assessed as capable of disaggregation by default, with no structural barrier identified. For 25 services (15%), the recommendation is that default disaggregation does not apply because a structural barrier affecting the whole service was identified. For a further 12 services (7%), a barrier was identified affecting part of the service. The position by directorate is set out in Table 2 below.

Table 2: Assessment outcomes by directorate

Directorate	Default disaggregation applies	Structural barrier - whole service	Structural barrier - part of service	Total assessed
Adult Social Care and Health	30 (94%)	2 (6%)	0 (0%)	32
Public Health	9 (82%)	0 (0%)	2 (18%)	11

Directorate	Default disaggregation applies	Structural barrier - whole service	Structural barrier - part of service	Total assessed
Children, Young People and Education	44 (77%)	9 (16%)	4 (7%)	57
Growth, Environment and Transport	32 (65%)	11 (22%)	6 (12%)	49
Chief Executive's and Deputy Chief Executive's Departments	15 (83%)	3 (17%)	0 (0%)	18
Overall	130 (78%)	25 (15%)	12 (7%)	167

Percentages are of each directorate's own total and are rounded; rows may not sum to 100%.

- 2.2. Complexity is not evenly distributed. In Growth, Environment and Transport, 17 of 49 services (35%) disaggregation by default does not apply to whole or part of the service, and in Children, Young People and Education, 13 of 57 (23%). In Adult Social Care and Health, the equivalent figure is 2 of 32 (6%).
- 2.3. **Services where a structural barrier to disaggregation by default was identified** Table 3 sets out the services concerned, grouped according to the predominant complexity driver underpinning the assessment. In practice many services exhibited multiple areas of complexity and interdependency; the categorisation reflects the principal factor influencing the assessment rather than the sole consideration. Two services whose indicative pathway is contingent on two-tier working are not included in Table 3, as the basis for that assessment differs from the others and is set out below.

Table 3: Services where a structural barrier to disaggregation was identified

Structural barrier affecting the whole service	Structural barrier affecting part of the service (part in brackets)
Predominant complexity driver: Demand	
Short Breaks – Children's (CYPE)	Coordinated admissions (Kent Test) (CYPE)
UASC Reception Centres (CYPE)	
UASC Assessment Service (CYPE)	
Predominant complexity driver: Delivery model	
Approved Mental Health Professional Services (AMHP) (ASC)	Culture & Creative Economy (Kent Film Office) (GET)
Domestic Abuse (CED)	Road Safety (Kent Driver Education) (GET)

County wide adoption & special guardianship (CYPE)	
Front Door (CYPE)	
Out of Hours (CYPE)	
Active Kent & Medway (GET)	
Community Safety – Domestic Homicide Reviews (GET)	
Strategic Resilience Team (GET)	
Predominant complexity driver: Staffing	
Prevent & Serious Organised Crime (GET)	Innovation and Business Intelligence (GET) (Intelligence function)
Education Lead Adviser (CYPE)	
Straits Committee Partnership (GET)	
Predominant complexity driver: Budget	
Dynamic Support Service (CYPE)	Kent & Medway Communication & Assistive Technology (CYPE) (AAC designation)
Predominant complexity driver: Assets / Systems	
Ed-Spark (CYPE)	Residential Children's Homes (single asset) (CYPE)
Kent Scientific Services (GET)	
Predominant complexity driver: Legislative Basis	
Kent Safeguarding Children Multiagency Partnership (KSCMP) (CED)	Business Investment (Growth Hub) (GET)
Kent and Medway Safeguarding Adults Board (KMSAB) (CED)	Economic Programmes & Strategies (except Business Advisory Board) (GET)
Archives (GET)	Natural Environment & Coast (Local Nature Recovery Strategy) (GET)
Coroners Service (GET)	Public Health CYP (Child Death Overview Panel) (PH)
Grow in Kent (GET)	Youth Justice (governance and partnerships) (CYPE)
Kent Downs & National Landscapes (GET)	
Skills & Employability (GET)	

- 2.4. **Indicative alternative pathways.** For the services where default disaggregation was not the indicative pathway, in whole or in part, the assessments also identified a broad alternative pathway to be explored

further in implementation planning. These are intended to support future planning and do not determine future service design or implementation arrangements.

- Continued countywide arrangement - the indicative alternative for the majority of these services (27). Continued countywide arrangements could be facilitated through future shared services or other models. Delivery model details are not prescribed by the SCA process and will need to be developed and agreed through the joint programme.
- 'Other' - eight services. Generally, for these services there remained an argument for a continued countywide arrangement of some kind, but with specific nuances to consider.
- Service contingent on two-tier working - two services. These services exist to coordinate between the county and district councils under the current two-tier structure, so a joint decision will be required on how they should be managed through the LGR process. No conclusions about staffing arise from this assessment. This is an issue that other areas going through LGR are also considering - for example, Surrey's Service Configuration recommendations suggests that their joint waste management partnership will continue in an interim hosted arrangement in the West Surrey unitary, pending a future decision from the new authorities.

2.5. **Services where disaggregation by default applies but significant risks or trade-offs were identified.** Disaggregation remains the indicative pathway for the services listed below and no structural barrier was identified. However, the assessments found that implementation risks, dependencies or trade-offs may be significant, relating for example to resilience, specialist expertise, service quality, cost, commissioning arrangements and partnership working. These factors do not preclude disaggregation, but may require specific mitigation, transitional arrangements or additional implementation planning. Examples include:

- Educational Psychology;
- Virtual School Kent;
- SEND Support and Inclusion;
- Adult Sensory Services;
- Deprivation of Liberty Safeguards;
- Trading Standards;
- Heritage Services;
- Sexual Health Services;
- Substance Misuse Services; and
- Refugee Resettlement.

2.6. **Functions that could align to the Devolution Framework.** The assessment identified a number of functions which could align with future Strategic Authority responsibilities should devolution arrangements be established, based on the current Devolution Framework and precedent set in other areas. These include functions relating to economic development,

strategic planning, transport, resilience, environmental policy and wider place-shaping activities.

- 2.7. The assessments were undertaken independently of any future decisions regarding Strategic Authority responsibilities. They nonetheless indicate that implementation planning must remain sufficiently flexible to accommodate evolving devolution proposals. The functions identified are neither exhaustive nor final and will depend on emerging national policy and Kent and Medway partnership work on devolution.

2.8. Services where there are joint practical considerations

- 2.8.1. Medway Council: The assessments identified services where implementation planning will need to consider how provision is configured across both North Kent and Medway, particularly where specialist assets, shared infrastructure or existing cross-boundary delivery arrangements are in place. Examples include Adult Short Breaks, waste disposal, AMHP services and children's out of hours provision.
- 2.8.2. District councils. The findings also highlight opportunities arising from the integration of county and district responsibilities within future unitary authorities, and future service design should consider where functions may benefit from greater alignment. Examples include resource management and circular economy, planning applications and minerals and waste planning, and economic development.
- 2.8.3. Partners: Many services operate within wider systems involving key strategic partners, particularly NHS Kent and Medway and Kent Police. Implementation and service design decisions will therefore require ongoing partner engagement so that operational dependencies, risks and opportunities are properly considered. Examples include safeguarding partnerships, the Better Care Fund, mental health forensic services and youth justice services.

3. What the findings mean for implementation and service design

- 3.1. Two features of the findings carry particular significance for implementation planning.
- 3.2. First, roughly one service in five - 37 of 167 - cannot follow the default disaggregation route in whole or in part, and for 27 of those the indicative alternative is a continued countywide arrangement. Arrangements of that kind will require agreement between four unitary authorities. The mechanism for reaching that agreement, and the point in the timetable by which it must be reached, are matters for the joint programme and will need to be established early.
- 3.3. Second, the assessments were undertaken on the basis that additional cost, reduced efficiency or increased staffing requirements are implementation consequences to be managed rather than barriers to disaggregation. Those

consequences are real and, in some services, material. They are recorded service by service as risks and trade-offs so that they can be quantified and managed through the joint programme. That quantification has not yet been undertaken and will need to be programmed.

- 3.4. Beyond these points, the assessments identified recurring themes affecting multiple services. Table 4 sets out those themes and what each requires of implementation planning.

Table 4: Recurring themes and implications for implementation planning

Theme	What the assessments found	What implementation planning will need to do
Interdependencies, pathways and system integration	Many services form part of broader countywide systems involving multiple services, organisations and end-to-end service user pathways, so decisions in one area have implications elsewhere. Hospital discharge and reablement, SEND assessment and safeguarding are the clearest examples.	Map these pathways and identify key dependencies to inform the sequencing of service design and transition decisions.
Demand mapping	Demand varies significantly across Kent, with some specialist services relying on countywide asset-based provision rather than local delivery. Community Day Services, Children's Short Breaks and specialist residential provision are the clearest examples.	Undertake more detailed demand analysis, consider cross-boundary service usage, and take decisions on future access to specialist assets.
Funding and spending complexity	Multiple complex financial arrangements were identified, involving pooled budgets, grants, trading activity and partnership funding, alongside pressures relating to overspends, debt and savings requirements. Examples include Section 75 arrangements with the NHS, the Better Care Fund, Public Health grant funding and Skills and Employability programmes.	Establish a full and accurate understanding of spending, demand and funding responsibilities, and determine how shared funding arrangements will operate after reorganisation.

Theme	What the assessments found	What implementation planning will need to do
Kent and Medway partnerships	Many services rely on formal Kent and Medway partnership arrangements providing countywide governance, safeguarding infrastructure and specialist capability, including KSCMP, KMSAB, the Child Death Overview Panel and Youth Justice Partnership arrangements.	Determine early which partnerships should continue at a countywide level, and how future governance, hosting and funding arrangements should operate.
Strategic Authority and Kent and Medway footprint	Several service areas depend on the wider Kent and Medway economic and spatial planning geography, including strategic planning, transport, economic development, resilience and environmental functions that align closely with the devolution framework.	Avoid creating barriers to any future Strategic Authority requirements, and maintain flexibility while devolution arrangements continue to develop.
Statutory roles, functions and policies	Statutory roles, governance arrangements and policy frameworks underpin safe and lawful delivery. Examples include Traffic Manager, Principal Social Worker and Virtual School Head, together with school admissions arrangements and Health and Wellbeing Strategies.	Identify the full range of statutory responsibilities and ensure appropriate capacity, governance and policy frameworks are in place from day one.
Transformation and legislative change	Many services are already undergoing transformation or responding to legislative reform, including Families First Transformation, SEND Reform, the Children's Wellbeing and Schools Bill and Simpler Recycling.	Align these programmes with LGR implementation wherever possible to avoid duplication, reduce disruption and ensure changes are delivered coherently.

Theme	What the assessments found	What implementation planning will need to do
Commissioning, contracts and markets	Many services rely on countywide commissioning arrangements, long-term contracts and specialist provider markets, including waste management, highways, public transport, SEN transport and Public Health commissioned services.	Establish approaches to contract novation, transitional commissioning arrangements and market management to maintain continuity and minimise disruption.
Systems	Many services depend on shared systems, records and information-sharing arrangements underpinning statutory delivery, safeguarding and performance management, including Mosaic, Liberi, Synergy and the Kent and Medway Care Record.	Identify critical systems, determine future ownership and governance, and ensure continuity of access to data and partner systems.
Centralised functions	Frontline services rely substantially on centralised intelligence, assurance, commissioning and business support functions, including the Public Health Observatory, Management Information Units, Quality Assurance teams and Arranging Support.	Ensure critical enabling functions are appropriately resourced and redesigned alongside frontline services.
Small and specialised teams	A number of services rely on scarce specialist expertise, professionally regulated roles and small countywide teams whose resilience depends on operating at scale, including Educational Psychologists, Best Interest Assessors, Public Health Consultants, Trading Standards and Strategic Resilience functions.	Determine how specialist capacity, resilience and expertise can be maintained across four organisations while supporting more place-based delivery.

Theme	What the assessments found	What implementation planning will need to do
Assets	Many services depend on specialist facilities, infrastructure and operational assets unevenly distributed across Kent and Medway that support current countywide delivery, including Family Hubs, waste infrastructure, libraries and archives, Kent Scientific Services facilities and highways assets.	Consider ownership, access, capacity and cross-boundary arrangements so that asset decisions support future service design, operational resilience and resident access.

- 3.5. These themes have been shared with KCC Directors and with the Chief Executives of all Kent and Medway councils, with the aim of informing developing thinking on LGR implementation planning.

4. Next steps

- 4.1. The findings provide KCC's starting point for joint implementation and service design discussions. They will need to be used alongside insights and preparation work undertaken separately by Medway and the district councils, and through the joint Priority Activity Groups that ran during the Enhanced Discovery Phase. Mapping is underway to establish how the findings can best be utilised within the emerging joint programme structure.
- 4.2. As implementation planning develops, the findings may inform consideration of future operating models, governance arrangements, workforce implications, partnerships, assets, systems and service continuity. They also provide a starting point for the internal preparation work that KCC services will need to undertake to be ready for LGR. Corporate and enabling services not included within the SCA process will be considered through future joint programme activity.

Recommendations

The Cabinet Committee is asked to:

- (1) **Note** and **comment** on the findings of the Service Complexity Assessments
-

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Appendices:

Appendix A: How the SCA process was undertaken

Appendix B: Service Complexity Assessments: One-Page Summaries

Background documents:

Previous papers to the Devolution and LGR Cabinet Committee, available at:
[Browse meetings - Devolution and Local Government Re-organisation Cabinet Committee - Kent County Council - Council & Democracy](#)

Internal Audit Progress Report to Governance and Audit Committee, 23 July 2026:
[Agenda for Governance and Audit Committee on Thursday, 23rd July, 2026, 10.00 am - Kent County Council - Council & Democracy](#)

Appendix A: How the SCA process was undertaken

1. Assumptions applied throughout the process

- 1.1. Disaggregation is the legal default of LGR - The assessments were undertaken on the basis that disaggregation is the legal default position where multiple unitaries are being formed, with alternative arrangements such as shared services being exceptions ultimately subject to agreement by future shadow authorities. The process therefore started from a default disaggregation position and identified whether structural barriers existed for each service that mean default disaggregation cannot apply. Where disaggregation was assessed as achievable but likely to carry consequences for cost, efficiency, staffing or service delivery, these were recorded as implementation risks and trade-offs to be quantified and managed through the joint programme, rather than treated as structural barriers. The indicative pathways identified do not preclude future decisions regarding shared services, contracts, assets or other collaborative arrangements that partners might later agree.
- 1.2. Safe and legal service delivery is the primary consideration - Maintaining safe and legal service delivery remained the overriding consideration throughout the assessment process. Poorly managed transition arrangements could create risks relating to accountability, safeguarding and statutory compliance. In some circumstances, phased implementation, temporary shared arrangements or other transitional measures may be required to support continuity of service. The individual assessments are a starting point to identify where such measures are likely to be needed.
- 1.3. Services may not be delivered in their current form in future - The assessments were based on current service arrangements, taking account of known transformation activity and legislative change where possible. They did not seek to predict future service design, operating models or implementation decisions. The findings should therefore be interpreted as reflecting the complexity of transitioning existing services rather than assumptions about how services may ultimately be configured.
- 1.4. Service delivery risk is not the same as disaggregation complexity - The assessments focused on disaggregation complexity rather than the overall risk profile of a service. Although service delivery risks may contribute to complexity, the two concepts are not synonymous. Some services may therefore be capable of disaggregation while still requiring significant implementation planning because of their statutory responsibilities, scale, risk profile or operational complexity.

2. The Service Complexity Assessment process

- 2.1. The programme was undertaken over an eight-week period by the Strategy and Policy Team, supported by a small team from PwC commissioned as an external partner at a cost of £440,000 to provide the additional capacity needed to complete the process within the required timescales. Three pilot assessments

were completed to refine the methodology before the main programme commenced. The process comprised three stages.

- 2.2. Information collection: The list of services in scope was agreed with Directorate Management Teams, who also identified 128 individual Service Leads to provide the required information. Over 170 standardised Request for Information (RFI) forms were completed, supported by more than 200 hours of meetings and correspondence. Information was collected across seven themes: demand, delivery model, budget, staffing, assets and systems, legislative basis, and the Service Lead's professional commentary on the main risks and opportunities of potentially disaggregating the service. The process generated an evidence base of more than 2,000 pages, or approximately 900,000 words. The quality and completeness of the information provided made an important contribution to the robustness of the assessments.
- 2.3. Analysis and assessment: Information collected through the RFIs was analysed and synthesised into 167 Scorecards. In a small number of cases where appropriate, RFIs covering closely connected services were combined to produce a single Scorecard. All figures in this report are calculated against those 167 completed assessments. Each Scorecard summarised the information provided under each theme and gave an objective assessment of the level of complexity through written commentary, with a RAG rating assigned as a rough visual indicator. The assessment was enhanced through analysis of quantitative demand data where available, analysis of corporately held information relating to systems, buildings and contracts, and separate discussions with commissioning leads. Extensive moderation within the SCA team was undertaken throughout to ensure complexity was assessed as consistently as possible across services.
- 2.4. The factors affecting each service varied considerably, so criteria for assessing complexity were applied flexibly. Across the services assessed, complexity was most commonly associated with legislative or geographical requirements; specialist workforce requirements; emergency, crisis or out-of-hours functions; highly uneven specialist demand; specialist assets that are difficult to replicate; multi-agency safeguarding arrangements; pooled or ringfenced funding; and complex contracts and framework agreements.
- 2.5. A final section of each Scorecard summarised the reasons for high complexity, flagged potential risks, trade-offs and opportunities, identified interdependencies requiring mapping in future planning, and set out the key questions that need to be understood about the service in the short, medium and long term to support implementation. It also recorded whether the service follows the disaggregation by default principle or, alternatively, set out the structural barrier identified and suggested an indicative alternative pathway for discussion.
- 2.6. Reporting and checking: To support reporting and wider discussion, a one-page summary was produced for each service, condensing the Scorecard into a single format covering service scope, complexity rating, indicative pathway and rationale, key internal and external interdependencies, principal complexity

drivers and risks, and key actions and next steps. These are appended at Appendix B. The completed Scorecards and one-page summaries were shared with KCC's Extended Corporate Management Team, alongside a comparative spreadsheet supporting filtering and comparison across all assessed services. Directors and relevant senior officers were invited to review the outputs and identify any factual inaccuracies or omissions that could have materially affected the findings, and any corrections identified have been incorporated into the final outputs.

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Service Complexity Assessments: One-page summaries

August 2026

Page 69

- These one-page summaries provide the key findings for each service / function covered in the Service Complexity Assessment (SCA) process which was undertaken by KCC as part of preparation for Local Government Reorganisation.
- **THE FINDINGS AND RECOMMENDATIONS SET OUT IN THE ONE-PAGE SUMMARIES ARE NOT DECISIONS.** They are intended to provide KCC's initial starting point for joint discussions on implementation planning and future service design.
- Information to inform the SCA process was collected between April and June 2026 (pre-LGR decision of 4 Unitaries).

Table of Contents – Directorates

Kent County Council – Divisional Groupings · click any entry to open its slide

1 CYPE

[1.1 Countywide](#)

[1.2 Education and SEND](#)

[1.3 Operational Integrated Children’s Services](#)

[1.4 Commissioning \(CYPE\)](#)

2 GET

[2.1 Environment and Circular Economy](#)

[2.2 Environment and Circular Economy: Resource Management and Circular Economy](#)

[2.3 Environment and Circular Economy: Environment](#)

[2.4 Growth and Communities: Community Protection](#)

[2.6 Growth and Communities: Economy](#)

[2.7 Growth and Communities: LRA](#)

[2.8 Growth and Communities: Strategic Development & Place](#)

[2.9 Highways and Transportation: Highways Asset Management](#)

[2.10 Highways and Transportation: Public Transport](#)

[2.11 Highways and Transportation: Transportation](#)

3 ASCH

[3.1 Long Term Support](#)

[3.2 Short Term Support](#)

[3.3 Commissioning \(ASCH\)](#)

[3.4 Business Support \(ASCH\)](#)

4 CED - Public Health

[4.1 Public Health](#)

5 CED/DCED*

[5.1 CED/DCED](#)

*The SCA process covered KCC’s resident-facing services including selected services in CED and DCED that are resident-facing or have close operational links to resident-facing services in CYPE, GET or ASCH.

Table of Contents – CYPE

Kent County Council – Divisional Groupings · click any entry to open its slide

1 CYPE

1.1 Countywide

- [1.1.1 Adoption and Special Guardianship Services](#)
- [1.1.2 Business Support](#)
- [1.1.3 Care Leaver Services](#)
- [1.1.4 Child Protection Chair Service](#)
- [1.1.5 Enablement Services](#)
- [1.1.6 Fostering](#)
- [1.1.7 Front Door](#)
- [1.1.8 Independent Reviewing Officers](#)
- [1.1.9 LADO Education Safeguarding Advisory Service \(LESAS\)](#)
- [1.1.10 Management Information \(Education\)](#)
- [1.1.11 Management Information \(ICS\)](#)
- [1.1.12 Out of Hours \(OOH\)](#)
- [1.1.13 Principal Social Worker](#)
- [1.1.14 Practice Development](#)
- [1.1.15 Residential Children's Homes](#)
- [1.1.16 Short Break Services](#)
- [1.1.17 Strengthening Independence Service](#)
- [1.1.18 UAS CS Social Work Service](#)
- [1.1.19 UASC Reception Safe Care Service](#)
- [1.1.20 Virtual School Kent](#)

1.2 Education and SEND

- [1.2.1 Area Education Teams \(North, East, South, West\)](#)
- [1.2.2 Area EHC Casework](#)
- [1.2.3 Children Missing Education](#)
- [1.2.4 Community Learning Service](#)
- [1.2.5 Coordinated Admissions](#)
- [1.2.6 Countywide Assessment and Placement Service](#)
- [1.2.7 Early Years SEN Support and Inclusion](#)
- [1.2.8 Ed-Spark \(Virtual Learning Platform\)](#)
- [1.2.9 Education Lead Adviser](#)
- [1.2.10 Education Resources and Planning](#)
- [1.2.11 Educational Psychology](#)
- [1.2.12 Elective Home Education](#)
- [1.2.13 High Needs Funding and Monitoring Officers \(Part of SEN Support and Inclusion\)](#)
- [1.2.14 Home to School Transport](#)
- [1.2.15 In-year Admissions](#)
- [1.2.16 Kent and Medway Communication and Assistive Technology \(KM CAT\) Service](#)
- [1.2.17 Kent Pupil Referral Units \(PRU\) and Attendance Service](#)
- [1.2.18 Phase Transfer including Phase Transfer Data Coordination Team](#)
- [1.2.19 SEND Business Support](#)
- [1.2.20 SEND Finance](#)
- [1.2.21 SEND Home to School Transport](#)

- [1.2.22 SEND Quality Assurance and SEND Strategic Development](#)
- [1.2.23 SEN Inclusion Advisers for Mainstream Schools and Independent and Non-Maintained Special Schools and Post 16/19 Providers \(part of SEN Support and Inclusion\)](#)
- [1.2.24 SEN Therapies \(part of SEN Support and Inclusion\)](#)
- [1.2.25 Specialist Learning and Teaching Service](#)
- [1.2.26 Specialist Teaching for Sensory and Physical Disabilities](#)
- [1.2.27 The Education Programme \(in-house tuition\)](#)
- [1.2.28 Tribunals](#)

1.3 Operational Integrated Children's Services

- [1.5.1 Adolescent Response Team](#)
- [1.5.2 Dynamic Support Service](#)
- [1.5.3 Early Help, Children's Social Work Services \(Assessment & Safeguarding\) for North, East, South and West, Children in Care and Adolescent Services](#)
- [1.5.4 Family Hubs](#)
- [1.5.5 I-Thrive and Participation](#)
- [1.5.6 Social Connections Service](#)
- [1.5.7 Turnaround](#)
- [1.5.8 Youth Justice](#)

1.4 Commissioning (CYPE)

- [1.4.1 CYP Commissioning: CYP Commissioning Function \(staffing cohort\), including Total Placement Service and TPS Contracting/Business Function](#)

Table of Contents – GET

Kent County Council – Divisional Groupings · click any entry to open its slide

2 GET

2.1 Environment and Circular Economy

[2.1.1 Communications and Engagement](#)

[2.1.2 Programme and Business Services](#)

2.2 Environment and Circular Economy: Resource Management and Circular Economy

[2.2.1 Kent Resource Partnership](#)

[2.2.2 Resource Management and Circular Economy](#)

2.3 Environment and Circular Economy: Environment

[2.3.1 Country Parks](#)

[2.3.2 Countryside Partnerships](#)

[2.3.3 Energy and Adaptation](#)

[2.3.4 Flood and Water Management](#)

[2.3.5 Heritage Conservation](#)

[2.3.6 Kent Downs National Landscape](#)

[2.3.7 Natural Environment and Coast](#)

2.4 Growth and Communities

[2.4.1 Innovation and Business Intelligence](#)

[2.4.2 Planning Applications and Minerals and Waste Planning](#)

2.5 Growth and Communities: Community Protection

[2.5.1 Community Safety, including Community Wardens](#)

[2.5.2 Community Safety: Domestic Homicide Reviews](#)

[2.5.3 Coroners Service](#)

[2.5.4 Kent Scientific Services](#)

[2.5.5 Trading Standards](#)

2.6 Growth and Communities: Economy

[2.6.1 Business Investment](#)

[2.6.2 Economic Strategy, Partnerships & Programmes](#)

[2.6.3 Grow in Kent \(Visit Kent and Invest Kent\)](#)

[2.6.4 No Use Empty](#)

[2.6.5 Skills and Employment](#)

[2.6.6 Village Halls and Old Rectory](#)

2.7 Growth and Communities: LRA

[2.7.1 Archives](#)

[2.7.2 Libraries](#)

[2.7.3 Registration](#)

2.8 Growth and Communities: Strategic Development and Place

[2.8.1 Active Kent & Medway](#)

[2.8.2 Broadband](#)

[2.8.3 Culture and Creative Economy](#)

[2.8.4 Development Investment Team](#)

[2.8.5 Gypsy Roma Traveller Residents Service](#)

[2.8.6 Public Rights of Way](#)

[2.8.7 Straits Committee Partnership](#)

[2.8.8 Strategic Planning and Infrastructure](#)

2.9 Highways and Transportation

[2.9.1 Strategic Contracts and Commissioning](#)

[2.9.2 Strategic Resilience](#)

2.10 Highways and Transportation: Highways Asset Management

[2.10.1 Highways Asset Management 1 - Strategic Assets, Street Lights assets, Soft landscape assets, Drainage assets, Structures and tunnels assets, and Carriageway/footways/cycleway assets](#)

[2.10.2 Highways Asset Management 2 - Safety Inspections, Routine Maintenance, Emergencies, Winter Service, Priority Response, Vehicle Crossings, High Speed Roads Programme, Fly-tipping and Enforcement](#)

[2.10.3 Highways Asset Management 3 - Streetworks, Compliance/Data Team](#)

2.11 Highways and Transportation: Public Transport

[2.11.1 Client Transport Operations and Planning](#)

[2.11.2 Fastrack Development](#)

[2.11.3 Public Transport Business Team](#)

[2.11.4 Public Transport Planning and Operations](#)

2.12 Highways and Transportation: Transportation

[2.12.1 Active Travel](#)

[2.12.2 Major Capital Projects](#)

[2.12.3 Road Safety](#)

[2.12.4 Traffic Management](#)

[2.12.5 Traffic Operations and Technology](#)

Table of Contents – ASCH

Kent County Council – Divisional Groupings · click any entry to open its slide

3 ASCH

3.1 Long Term Support

- [3.1.1 Approved Mental Health Professional Services \(AMHP\)](#)
- [3.1.2 Area Team – Ashford and Canterbury](#)
- [3.1.3 Area Team – North Kent](#)
- [3.1.4 Area Team – Thanet and South Kent Coast](#)
- [3.1.5 Area Team – West Kent](#)
- [3.1.6 Continuing Health Care Team](#)
- [3.1.7 Direct Payments Team](#)
- [3.1.8 Mental Health Forensic and Early Discharge Planning](#)
- [3.1.9 Operational Support Services](#)
- [3.1.10 Prevent and Serious Organised Crime](#)
- [3.1.11 Young Peoples Teams](#)

3.2 Short Term Support

- [3.2.1 Adult Short Break Services](#)
- [3.2.2 Adult Social Care Connect](#)
- [3.2.3 Adults Sensory Services](#)
- [3.2.4 Blue Badge Service \(including Mobility Assessors\)](#)
- [3.2.5 Community Day Services](#)
- [3.2.6 Kent Enablement at Home \(KEaH\)](#)
- [3.2.7 Kent Enablement Services](#)
- [3.2.8 Occupational Therapy Service](#)
- [3.2.9 Performance](#)

[3.2.10 Quality Assurance](#)

[3.2.11 Shared Lives](#)

[3.2.12 Short Stay Services/Integrated Care Centres](#)

[3.2.13 Short Term Pathways](#)

[3.2.14 Strategic Safeguarding Unit](#)

[3.2.15 Strategic Safeguarding, Policy, Practice and Quality Assurance \(Excl. Strategic Safeguarding Unit\)](#)

[3.2.16 Technical Service](#)

[3.2.17 The Deprivation of Liberty Safeguards Service \(DOLS\)](#)

3.3 Commissioning (ASCH)

[3.3.1 ASCH Commissioning Staffing \(Prevention, Living and Ageing Well and Assurance\) – Brokerage and Technology Enabled Lives](#)

3.4 Business Support (ASCH)

[3.4.1 Business Support Unit](#)

[3.4.2 Mosaic Provider Portal](#)

[3.4.3 Systems](#)

Table of Contents – CED/DCED

Kent County Council – Divisional Groupings · click any entry to open its slide

4 CED - Public Health

4.1 Public Health

[4.1.1 Additional Public Health Functions – BSU](#)

[4.1.2 Additional Public Health Functions – Training](#)

[4.1.3 Portfolio Covering Public Health: Children, Young People, Families and Carers](#)

[4.1.4 Portfolio Covering Public Health: Healthcare and Long-Term Conditions](#)

[4.1.5 Portfolio Covering Public Health: Health Intelligence, Education and Training and Research and Innovation](#)

[4.1.6 Portfolio Covering Public Health: Health Protection and Health Inequalities](#)

[4.1.7 Portfolio Covering Public Health: Lifestyle Services](#)

[4.1.8 Portfolio Covering Public Health: Sexual Health Services](#)

[4.1.9 Portfolio covering Public Health: Strategy and Partnerships](#)

[4.1.10 Portfolio covering Public Health: Substance Misuse and Mental Health](#)

[4.1.11 Public Health Commissioning](#)

5 CED/DCED*

5.1 CED/DCED

[5.1.1 Arranging Support Team](#)

[5.1.2 Capital and Strategic Projects](#)

[5.1.3 Domestic Abuse Service](#)

[5.1.4 Early Years Funding](#)

[5.1.5 Facilities Management to Schools](#)

[5.1.6 Finance Operations - ASC Finance Assessment](#)

[5.1.7 Finance operations – Exchequer](#)

[5.1.8 Finance Operations – Schools Funding and High Needs Funding](#)

[5.1.9 Home to School Transport Appeals](#)

[5.1.10 Kent and Medway Safeguarding Adults Board \(KMSAB\)](#)

[5.1.11 Kent Safeguarding Children Multi-agency Partnership \(KSCMP\)](#)

[5.1.12 MRX: Customer Service Delivery](#)

[5.1.13 Permanent School Exclusion Appeals](#)

[5.1.14 Portfolio Management - Financial Hardship Programme](#)

[5.1.15 Portfolio Management - Refugee Resettlement Programme](#)

[5.1.16 Portfolio Management - Ukraine Refugee Response Programme](#)

[5.1.17 Resilience & Emergency Planning](#)

[5.1.18 School Appeals](#)

*The SCA process covered KCC’s resident-facing services including selected services in CED and DCED that are resident-facing or have close operational links to resident-facing services in CYPE, GET or ASCH.

Table of Contents – CYPE

Kent County Council – Divisional Groupings · click any entry to open its slide

1 CYPE

1.1 Countywide

- [1.1.1 Adoption and Special Guardianship Services](#)
- [1.1.2 Business Support](#)
- [1.1.3 Care Leaver Services](#)
- [1.1.4 Child Protection Chair Service](#)
- [1.1.5 Enablement Services](#)
- [1.1.6 Fostering](#)
- [1.1.7 Front Door](#)
- [1.1.8 Independent Reviewing Officers](#)
- [1.1.9 LADO Education Safeguarding Advisory Service](#)
- [1.1.10 Management Information \(Education\)](#)
- [1.1.11 Management Information \(ICS\)](#)
- [1.1.12 Out of Hours \(OOH\)](#)
- [1.1.13 Principal Social Worker](#)
- [1.1.14 Practice Development](#)
- [1.1.15 Residential Children's Homes](#)
- [1.1.16 Short Break Services](#)
- [1.1.17 Strengthening Independence Service](#)
- [1.1.18 UAS CS Social Work Service](#)
- [1.1.19 UASC Reception Safe Care Service](#)
- [1.1.20 Virtual School Kent](#)

1.2 Education and SEND

- [1.2.1 Area Education Teams \(North, East, South, West\)](#)
- [1.2.2 Area EHC Casework](#)
- [1.2.3 Children Missing Education](#)
- [1.2.4 Community Learning Service](#)
- [1.2.5 Coordinated Admissions](#)
- [1.2.6 Countywide Assessment and Placement Service](#)
- [1.2.7 Early Years SEN Support and Inclusion](#)
- [1.2.8 Ed-Spark \(Virtual Learning Platform\)](#)
- [1.2.9 Education Lead Adviser](#)
- [1.2.10 Education Resources and Planning](#)
- [1.2.11 Educational Psychology](#)
- [1.2.12 Elective Home Education](#)
- [1.2.13 High Needs Funding and Monitoring Officers \(Part of SEN Support and Inclusion\)](#)
- [1.2.14 Home to School Transport](#)
- [1.2.15 In-year Admissions](#)
- [1.2.16 Kent and Medway Communication and Assistive Technology \(KM CAT\) Service](#)
- [1.2.17 Kent Pupil Referral Units \(PRU\) and Attendance Service](#)
- [1.2.18 Phase Transfer including Phase Transfer Data Coordination Team](#)
- [1.2.19 SEND Business Support](#)
- [1.2.20 SEND Finance](#)
- [1.2.21 SEND Home to School Transport](#)

- [1.2.22 SEND Quality Assurance and SEND Strategic Development](#)
- [1.2.23 SEN Inclusion Advisers for Mainstream Schools and Independent and Non-Maintained Special Schools and Post 16/19 Providers \(part of SEN Support and Inclusion\)](#)
- [1.2.24 SEN Therapies \(part of SEN Support and Inclusion\)](#)
- [1.2.25 Specialist Learning and Teaching Service](#)
- [1.2.26 Specialist Teaching for Sensory and Physical Disabilities](#)
- [1.2.27 The Education Programme \(in-house tuition\)](#)
- [1.2.28 Tribunals](#)

1.3 Operational Integrated Children's Services

- [1.5.1 Adolescent Response Team](#)
- [1.5.2 Dynamic Support Service](#)
- [1.5.3 Early Help, Children's Social Work Services \(Assessment & Safeguarding\) for North, East, South and West, Children in Care and Adolescent Services](#)
- [1.5.4 Family Hubs](#)
- [1.5.5 I-Thrive and Participation](#)
- [1.5.6 Social Connections Service](#)
- [1.5.7 Turnaround](#)
- [1.5.8 Youth Justice](#)

1.4 Commissioning (CYPE)

- [1.4.1 CYP Commissioning: CYP Commissioning Function \(staffing cohort\), including Total Placement Service and TPS Contracting/Business Function](#)

Table of Contents – CYPE – Countywide

1.1 Countywide

[1.1.1 Adoption and Special Guardianship Services](#)

[1.1.2 Business Support](#)

[1.1.3 Care Leaver Services](#)

[1.1.4 Child Protection Chair Service](#)

[1.1.5 Enablement Services](#)

[1.1.6 Fostering](#)

[1.1.7 Front Door](#)

[1.1.8 Independent Reviewing Officers](#)

[1.1.9 LADO Education Safeguarding Advisory Service \(LESAS\)](#)

[1.1.10 Management Information \(Education\)](#)

[1.1.11 Management Information \(ICS\)](#)

[1.1.12 Out of Hours \(OOH\)](#)

[1.1.13 Principal Social Worker](#)

[1.1.14 Practice Development](#)

[1.1.15 Residential Children's Homes](#)

[1.1.16 Short Break Services](#)

[1.1.17 Strengthening Independence Service](#)

[1.1.18 UAS CS Social Work Service](#)

[1.1.19 UASC Reception Safe Care Service](#)

[1.1.20 Virtual School Kent](#)

Scope:
Adoption services in Kent are delivered by Adoption Partnership South East (APSE), a Regional Adoption Agency serving KCC (lead partner), Bexley and Medway. APSE delivers statutory adoption activity: adopter recruitment and assessment, family finding, care-planning advice, adoption support and stepparent adoptions, countywide from Maidstone, with a single regional Adoption Panel.

Does Disaggregation by default apply to this service? Part

Why?

APSE should remain a Regional Adoption Agency because pooled budgets, shared governance, Adoption Panels and specialist capacity align with government guidance and statutory delivery expectations. Disaggregation would fragment cost-sharing and scarce expertise. The recommended decision is to retain the RAA and determine future hosting across new authorities.

1.1.1 Adoption and Special Guardianship Services

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in the Red-rated delivery model and legislative basis. Delivery is intrinsically regional: governance, pooled budgets, a single regional Adoption Panel, shared Agency Decision Makers, centralised Kent-hosted support functions and multi-authority case management systems are all configured at partnership level, meaning separation would require substantial reconfiguration rather than a straightforward split. The statutory framework — the Adoption and Children Act 2002 and Adoption Agencies Regulations 2005, combined with government guidance that strongly promotes Regional Adoption Agencies to build adopter sufficiency and consistency of practice, further constrains options for geographical disaggregation. Amber factors compound this: demand is specialist and includes therapeutic and multi-agency intervention; staffing is a specialist, professionally regulated workforce of c.70 with social workers requiring over three years' adoption experience; the budget is pooled proportionately with ringfenced external-placement income; and assets rely on multiple specialist systems (Liberi, Power BI, Oracle, and access to Bexley and Medway systems). Together these factors make the affected parts particularly regional governance, panels and pooled arrangements materially harder to disaggregate.

What are the potential risks of disaggregation that need to be considered?

A shared Regional Adoption Agency preserves access to a larger and more diverse pool of adopters, supports timely matching, reduces delays and sustains a specialist, multi-disciplinary support offer that is harder to maintain in smaller standalone services. Fragmenting APSE therefore risks reducing adopter sufficiency, weakening consistency of practice and eroding the resilience of specialist and therapeutic capacity across the area. The assessment notes that disaggregation would risk fragmenting cost-sharing arrangements and the ringfenced income flows generated when external authorities place children with APSE adopters, with potential consequences for financial sustainability. Workforce consequences are also material: duplicating specialist, professionally regulated capacity across smaller authorities could create capability pressures given the three-year qualification threshold for adoption assessments.

Interdependencies

- Children in Care Team for early permanence and placements.
- Centralised KCC HR, legal, complaints, MI and Liberi system.
- Partnership governance with Medway and Bexley: pooled budgets, shared ADMs.
- Ofsted ILACS inspection, ASGSF providers and Barnardo's birth-family contract.

Next Steps/ Actions

Now

Re-apportion pooled budget, map c.70 staff and protect ringfenced adopter-placement income.

Next

Confirm APSE host authority, Bexley's role and RAA regulatory requirements.

Future

Evolve Partnership Board governance, preserve specialist roles and integrate case management systems.

Scope:
The ICS Business Support Service provides administrative and operational support to frontline Integrated Children's Services across Kent, underpinning statutory children's social care and related functions. It supports Family Hubs, Early Help, Children's Social Work, Corporate Parenting, Youth Justice, Safeguarding, and Virtual School Kent.

Does disaggregation by default apply to this service? Yes

Why?
Enabling service tied to the statutory functions it supports, not resident-facing. Complexity stems from dependency, scale and integration, not barriers to disaggregation. The large, mainly administrative, workforce and area-based teams enable splitting across successor authorities. Key considerations: preserving specialist capacity, protecting economies of scale, and managing interdependencies through sequencing.

1.1.2 Business Support

Complexity Driver RAG Assessment					
Demand (A)		●	Delivery Model (A)		●
Staffing (G)		●	Budget (G)		●
Assets/ Systems (A)		●	Legislative (A)		●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in demand volatility, delivery model design, assets and systems, and the legislative context of the services enabled. Demand is uneven with fluctuations linked to the UASC National Transfer Scheme, which sees increases when children transfer into Area Children in Care teams, alongside a wide range of specialist, statutory activity that cannot easily be segmented by geography without duplication. The hybrid delivery model combines area-based teams with centralised specialist and statutory functions that rely on scale, shared governance and consistent practice, and the service is already in transformation under the Families First Programme due to go live no later than April 2027. Assets and systems complexity is driven by dependence on a wide ecosystem of specialist IT platforms, licensing arrangements, secure MASH buildings and Family Hub premises, all of which would need to be mapped, re-licensed or replicated. Legislative complexity is indirect: Business Support itself is not statutory, but it must maintain the safeguarding, information governance and compliance capacity required by the statutory services it underpins.

What are the potential risks of disaggregation that need to be considered?
Splitting the service risks eroding economies of scale, fragmenting specialist functions held by a small number of expert staff and adding management duplication across new authority boundaries. Information-sharing and case-handover risks arise where safeguarding and statutory casework crosses new geographies, alongside potential workforce destabilisation through pay differentials, competitive recruitment and transition uncertainty. Contract transfer gaps and inconsistent operating standards are identified as risks, particularly given that statutory services must continue without interruption. Budget rebasing by successor authority could reduce economies of scale and introduce administrative complexity, and reliance on Home Office UASC income adds an external funding dependency linked to volatile demand. Conversely, disaggregation offers the opportunity to redesign around local demand, strengthen local partnerships, and embed a consistent Business Support “golden thread” aligned to Families First.

Interdependencies

- Whole CYPE service dependency across all operational areas.
- Technology and Governance dependency, with IG Lead in MI.
- Access Group sole supplier of Synergy/Core+ until 2028.
- Cantium support plus specialist software licences.
- Health and Police data-sharing needing LGR reconfiguration.

Next Steps/ Actions

Now
Map Synergy and Core+ data, users, contracts, safeguarding and partner data-sharing arrangements by successor geography. Explore technical solutions and use of AI to further streamline processes.

Next
Decide contractual route, successor IG ownership, workforce model and sequencing of statutory reporting transfer.

Future
Design service to preserve statutory capacity, retain specialist capability and align with LGR reform timelines.

Scope:
KCC's 18+ Care Leavers Service delivers statutory support to care-experienced young people aged 17–25, discharging duties under the Children Act 1989, Children Leaving Care Act 2000, Children and Social Work Act 2017 and Children's Wellbeing and School Act 2026.

Does Disaggregation by default apply to this service? Yes

Why?
The service can be disaggregated. Countywide integration, pooled budgets, shared systems and interdependencies are implementation complexities to mitigate, not barriers. The strongest constraint is the DfE-funded Housing Project's eight multi-authority panels. UASC concentration at Dover, Home Office funding volatility, specialist workforce and shared Liberi systems are manageable through phased, conditional transition.

1.1.3 Care Leaver Services

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is driven primarily by the delivery model. Delivery is highly integrated and countywide, relying on flexible workforce deployment across two office sites, the in-house Ofsted-registered Kent Supported Homes provision, commissioned accommodation providers and multi-agency coordination with 12 district housing authorities, health, police, DWP, Home Office and national partners. The DfE-funded Housing Project, operating through eight multi-authority panels, is explicitly identified as difficult to disaggregate. Demand is structurally complex, with UASC cases concentrated around the Port of Dover creating uneven pressure across unitary geographies. Budget complexity arises from pooled countywide management and heavy reliance on caseload-dependent Home Office UASC funding, while the workforce carries significant specialist capacity that is not easily replicated. Statutory immigration and asylum duties linked to the port further constrain how the service can be geographically restructured.

What are the potential risks of disaggregation that need to be considered?
The principal consequence is potential disruption to a countywide model that currently absorbs demand volatility across all care-leaver cohorts through pooled budgets and flexible staffing, including the caseload-dependent Home Office-funded UASC element. Successor authorities inheriting high UASC concentrations would face disproportionate demand and funding exposure, given that Home Office UASC funding is caseload dependent. Fragmenting the workforce risks intensifying existing recruitment pressures for Personal Advisers and specialist Accommodation Officers, particularly in areas competing with London Boroughs and Medway, and could dilute access to specialist asylum, mental health, EET, housing and custody roles currently held countywide. Separating the DfE-funded Housing Project and multi-authority panel arrangements could weaken established accommodation pathways. Continuity of Personal Adviser relationships, which is central to the care leaver offer, may be compromised during transition, and consistency of the corporate parenting offer across successor authorities would need active management. Reorganisation would also intersect with the ongoing Ofsted Improvement Plan, which is currently paused pending LGR decisions.

Interdependencies

- Children in Care and Fostering pathway; shared Liberi system.
- In-house Ofsted-registered Kent Supported Homes accommodation provision.
- Home Office UASC funding and asylum duties at Dover.
- DfE Housing Project across twelve districts' multi-authority panels.

Next Steps/ Actions

Now
Map UASC demand and fixed accommodation assets by proposed authority geography.

Next
Agree apportionment of Home Office funding, Housing Project and Liberi arrangements.

Future
Design successor services preserving Personal Adviser continuity and corporate parenting consistency.

Scope:
The Child Protection Chair Service provides independent statutory oversight of Kent's child protection planning, chairing Initial and Review Child Protection Conferences and convening partners to agree and quality assure child protection plans. It also undertakes audits, investigations, training and consultation, safeguarding Kent's most vulnerable children.

Page 30
Does Disaggregation by default apply to this service? Yes

Why?
The identified complexities are operational constraints, not barriers, so disaggregation remains feasible once transition is addressed. Statutory demand, uneven district distribution and flexible countywide deployment of a specialist workforce are challenges but not prohibitive. The Families First move to a Lead Child Protection Practitioner and KSCMP interdependencies must inform transition planning.

1.1.4 Child Protection Chair Service

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?
Demand is rated Red because caseloads have risen materially and are unevenly distributed, with pressure recently concentrating in Canterbury, Thanet and the wider South and East, having previously sat in Sevenoaks and North Tonbridge and Malling. Delivery Model is also Red: although structured as a hybrid North/West and South/East split, the service is functionally countywide and depends on routinely redeploying Chairs across districts to manage fluctuating demand, alongside conducting countywide audits, investigations and training. Staffing is Amber given the requirement for professionally regulated, Social Work England registered Chairs with extensive statutory experience, most drawn from former team manager or practice educator backgrounds, and recent recruitment history indicates a limited candidate pool. The Legislative rating is Red because, while no legislation mandates a specific geographic footprint, the service is statutory and multiple forthcoming reforms (the Children's Wellbeing and Schools Act 2026, Families First Programme, Children's Social Care National Framework) and updates to Working Together are expected to reshape the role before 2029. Budget and Assets/Systems are Green and do not present material complexity.

What are the potential risks of disaggregation that need to be considered?
Service disruption is a consequence given the risk of breaking apart a complex frontline safeguarding function during a period of rising demand and statutory transformation. Workforce instability is also flagged: uncertainty during transition could prompt highly skilled, regulated professionals to leave, compounding the recruitment challenges already evidenced. Set against these consequences, there are opportunities including enhanced local responsiveness, clearer accountability, and disaggregation acting as a catalyst for local integration across services, which should be weighed alongside the risks in any transition plan.

Interdependencies

- Operational links with MIU and Practice Development teams.
- Liberi case management and flexible cross-footprint Chair deployment.
- Statutory partnership with Police, Health and Education via KSCMP.
- Family Hubs, Early Help and Children's Social Work services.

Next Steps/ Actions

Now
Map caseload distribution and safeguarding continuity across current North/West and South/East footprints.

Next
Confirm allocation of regulated Chairs and KSCMP arrangements across successor bodies.

Future
Design a sustainable Chair model reflecting Families First and demand pressures.

Scope:
The Kent Enablement and Prevention Service provides specialist enablement, behavioural and preventative support to children and young people (and their families) with additional needs, including autism, learning disabilities and behaviours that challenge. It reduces escalation of need, supports stability across home, education and care, and informs commissioning and service design.

Does Disaggregation by default apply to this service? Yes

Why?
There is no strong evidence against disaggregation. Budget, assets, systems and legislative basis are rated Green and identified complexities are not insurmountable. The main condition is the Red-rated staffing: a small, specialist behavioural workforce that is hard to recruit, where countywide scale supports viability. Phased disaggregation, or redesign, could be viable pathways.

1.1.5 Enablement Services

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the Red-rated Staffing driver and the Amber-rated Demand and Delivery Model drivers. The workforce includes highly specialised behaviour analyst role requiring MSc-level qualification, professional certification and ongoing CPD, with training pathways of 2–4 years and national recruitment and retention challenges evidenced. The service is delivered by only 6 FTE plus fractional posts and countywide scale is stated as important to maintain viability and resilience. Demand is countywide but unevenly distributed and is responsive to system pressures such as placement instability and education breakdown rather than being stable or standardised. Delivery relies on a centralised specialist team flexibly deployed across the county, with no fixed locality teams and significant interdependencies with Children's Social Care, Education and SEND services, in-house residential and short breaks provision, schools, health partners and commissioned care providers.

What are the potential risks of disaggregation that need to be considered?
Loss of scale required to sustain specialist behavioural expertise is the principal risk, alongside reduced flexibility and responsiveness to system pressure, increased recruitment and resilience risks across multiple smaller organisations, and fragmentation of preventative impact including reduced influence on commissioning and system design activity such as Project Athena. The assessment reinforces the workforce risk, noting that the staffing model relies on concentration of specialist expertise within a single service rather than dispersed teams, and that disaggregation may not be viable within the existing model. Financial consequences are indirect: the service contributes to MTFP through cost avoidance rather than direct savings, so fragmentation could weaken preventative impact on higher-cost provision. Offsetting opportunities recorded include greater local visibility of enablement activity and potential for closer alignment with local delivery, provided specialist capacity can be sustained.

Interdependencies

- Children's Social Care, Education and SEND services.
- In-house residential and short breaks provision.
- Adolescent Response Unit, Families First and Adult enablement.
- Schools, health partners, commissioned providers and Project Athena.

Next Steps/ Actions

Now
Test minimum viable scale for the specialist behaviour analyst workforce.

Next
Map interdependencies and clarify Project Athena funding under any new structure.

Future
Design a model preserving specialist expertise and system-wide preventative impact.

Scope:
Kent Fostering & Kinship Service is a specialist, standalone in-house fostering agency delivering KCC's statutory fostering and kinship duties. It recruits, assesses, approves, trains, supervises and supports mainstream foster carers, and assesses and supports connected persons and special guardians for children in care, under a single Ofsted registration.

Page 22
Does Disaggregation by default apply to this service? Yes

Why?
No evidence shows the service cannot be separated legally, financially or operationally. Legislation does not mandate a single Kent-wide agency, and every authority operates equivalent duties at smaller scale. Statutory governance functions are not divisible but are replicable in each successor. Financial, workforce and duplication impacts are consequences managed through sequencing and shared arrangements.

1.1.6 Fostering

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the Red-rated Staffing driver and in the Amber-rated Delivery Model, Budget, Assets/Systems and Legislative drivers. The workforce includes statutorily-mandated and professionally regulated roles (Registered Manager, Agency Decision Maker, Panel Chair, specialist assessment social workers, therapists, regulated fostering officers), with existing retention pressure in the Kinship Service. The delivery model is single-registered with Ofsted and depends on centralised recruitment, training, panel governance, review, therapeutic and kinship functions that each successor authority would need to replicate. Demand is structurally uneven, with in-house sufficiency gaps at district level in Canterbury, Swale and currently absorbed through countywide matching. The financial model is engineered at countywide scale and underpins MTFP that depend on a single recruitment pipeline, Mockingbird constellations and integrated incentive schemes. Concurrent engagement with the South East Regional Care Co-operative and the Renewing Fostering Programme adds double-change risk if disaggregation and reform occur in the same window.

What are the potential risks of disaggregation that need to be considered?
Each successor authority would need to obtain its own Ofsted registration and establish its own Agency Decision Maker and Fostering Panel arrangements, with regulatory judgement and timing risk during transition. District-level placement sufficiency gaps would crystallise, with likely increased reliance on Independent Fostering Agencies and regional commissioning, and cost implications. A material proportion of MTFP savings would be at risk unless preserved through shared arrangements, alongside stranded costs from duplicating finance, contracting and grant management and the renegotiation of Kent-level DfE grants. Workforce destabilisation is a live risk, particularly in kinship assessment where retention is already pressured, and TUPE combined with the replication of specialist regulated roles across successors compounds this. Safeguarding and quality risk applies through transition, especially for in-progress court-directed kinship assessments with binding statutory timescales. Further consequences include dilution of Kent’s single fostering recruitment brand in a competitive carer market, carer experience impacts during transfer between successor services.

Interdependencies

- Ofsted single-provider registration and regulatory continuity.
- Children’s Social Work, Legal, Finance and Virtual School.
- Countywide recruitment, Mockingbird constellations and MTFP-linked savings.
- DfE grants and Regional Care Co-operative arrangements.

Next Steps/ Actions

Now
Map in progress kinship assessments, sufficiency gaps and Ofsted registration timings.

Next
Confirm hosting of ADM, Panel and Registered Manager functions transitionally.

Future
Design successor agencies preserving recruitment reach, savings and regulatory compliance.

Scope:
The Front Door is Kent's countywide, in-house single point of contact for concerns and Requests for Support for children and families across the 12 districts (excluding Medway). It screens, triages and routes contacts to Family Help, statutory intervention or signposting, applying agreed Support Level Guidance.

Does Disaggregation by default apply to this service? No - Whole
Why?

Front Door should remain countywide because it provides the single statutory gateway for consistent thresholds and timely multi-agency safeguarding decisions. Splitting the service would duplicate roles, fragment accountability and create safeguarding inconsistency. Continued countywide delivery is the strongest recommendation.

1.1.7 Front Door

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/Systems (G)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the Red-rated Demand and Legislative drivers, with material Amber factors in Delivery Model and Staffing. Demand is countywide but uneven, with three districts (Maidstone, Swale, Thanet) driving materially higher RFS volumes, alongside c.10,000 emails per month. The service discharges statutory duties under the Children Act 1989, Children Act 2004 and Working Together to Safeguard Children 2026, tying delivery to defined local authority boundaries and requiring lawful multi-agency information sharing. Delivery relies on a centralised Central Referral Unit with embedded Police, health and probation partners, plus internal dependencies on Children's Social Work, Youth Justice and SEND. The workforce is predominantly experienced, professionally regulated social workers not suitable for newly qualified practitioners, supported by specialist Front Door Officers requiring service-specific training.

What are the potential risks of disaggregation that need to be considered?
The most decision-relevant consequence is the loss of a single Kent-wide threshold document and cohesive triage function, with the assessment flagging a risk of multiple threshold frameworks and inconsistent application across successor authorities. Furthermore under Families First transformation a new threshold document has just been developed and agreed with partners. Duplication of roles across unitary authorities is expected to reduce the efficiency currently delivered through scale. Splitting the embedded Central Referral Unit partnership with Police, health and probation introduces transition risk to timely multi-agency safeguarding decision-making. The assessment identifies one directly evidenced opportunity: smaller unitary authorities may enable stronger local multi-agency working.

Interdependencies

- Children's Social Work, Early Help, Family Hubs, Youth Justice and SEND
- Shared systems: Liberi, EHM, Core Plus and Nimbus/Luware telephony.
- Central Referral Unit partnership with Police, health and probation.
- Statutory duties and Families First reforms shape multi-agency information sharing.

Next Steps/ Actions

Now
Confirm a continued countywide Front Door and its governance across successor authorities.

Next
Agree retention of the Kent-wide threshold document and Central Referral Unit partnership.

Future
Sustain consistent thresholds, the specialist workforce and system ownership across boundaries.

Scope:
The Independent Reviewing Officers service safeguards children in care by independently reviewing care plans and monitoring KCC's performance as corporate parent. Independent of operational social work teams, IROs chair statutory reviews and engage directly with children. It is countywide, with a dedicated UASC team.

Does Disaggregation by default apply to this service? Yes

Why
The IRO service can reasonably be treated as disaggregation by default, with no strong evidence against splitting. Demand, Budget, Staffing and Assets/Systems are Green: a countywide statutory service delivered in-house by a regulated workforce with no constraining assets. Amber Delivery Model and Legislative ratings reflect cross-boundary flexibility and continuity, not blockers.

1.1.8 Independent Reviewing Officers

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the delivery model and the legislative basis. The service is currently structured to flex across geographic teams so that sudden demand spikes, such as large sibling groups entering care, can be absorbed within a larger pool of IROs; disaggregation into smaller units would reduce this cushion. Delivery depends on interdependencies with Children's Social Work teams, the Strengthening Independence Service, UASC services, Youth Justice, 18+ services, and statutory partners (health, police, education) through multi-agency reviews and escalation. The service is wholly statutory, with expectations of continuity of relationship between the IRO and the child, including when placements move across local authority boundaries. UASC IRO activity is Home Office funded and covers children placed nationally, adding a further cross-boundary layer. The Families First Transformation Programme may also affect IRO roles alongside wider children's services.

What are the potential risks of disaggregation that need to be considered?
Maintaining independence and consistency of oversight may become harder if IROs are aligned to smaller geographic areas, particularly as caseloads fluctuate and statutory allocation duties must be met regardless of local capacity. A district-based footprint may struggle to absorb events such as large sibling groups entering care, which a larger team currently accommodates. Failure to sustain statutory IRO functions carries safeguarding and Ofsted consequences. Home Office funding for the UASC IRO function adds a further consideration given UASC children are placed countrywide. Cross-boundary working for children placed outside Kent, and coordination of multi-agency reviews and escalation, would need to remain reliable through any transition.

Interdependencies

- Social Work, UASC and 18+ services rely on IRO oversight.
- Flexible deployment across geographic teams sustains statutory allocation during spikes in demand.
- Multi-agency reviews with health, police, education and commissioned placement providers.
- Home Office funds UASC IRO activity for nationally placed children.

Next Steps/ Actions

Now
Map IRO caseloads and reallocation options to preserve continuity for children.

Next
Confirm Home Office UASC funding and workforce transfer sustaining scale and independence.

Future
Design a model with scale to absorb demand volatility and ensure continuity.

Scope:
LESAS combines the statutory Local Authority Designated Officer (LADO) function with education safeguarding support. It delivers the LADO function for the whole children's workforce and provides safeguarding advice, challenge and training to early years settings, schools, colleges and childminders across Kent. Delivery is in-house and countywide.

Does Disaggregation by default apply to this service? Yes

Why?
There is no reason the service is unsuitable for disaggregation by default. Demand is consistent across the four education areas, budget is countywide with no geographic allocation, and the statutory LADO footing allows different configurations per unitary. Complexity lies in specialist expertise, a shared Liberi database, the impartiality rota and traded income, not hard barriers.

1.1.9 LADO Education Safeguarding Advisory Service (LESAS)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is driven by four Amber factors: Demand is characterised by specialist, statutory casework and responsiveness to high-profile incidents, inspection regimes and shifting national guidance rather than by uniform transactional volume. Delivery is deliberately countywide, with a centralised rota used to ensure equitable workload distribution, maintain consistency and avoid LADOs becoming over-familiar with individual settings. Staffing is small in scale but concentrated in senior, professionally regulated social work roles combined with specialist online safety and traded training capability. The legislative basis is strong on both the LADO and education safeguarding sides, forthcoming national policy may alter aspects of education safeguarding delivery, but the statutory requirement for a LADO function and associated safeguarding duties remains explicit. Shared countywide records held on Liberi would need to be separated to align with new boundaries.

What are the potential risks of disaggregation that need to be considered?
In smaller structures, LADOs may become over-familiar with individual settings, weakening statutory impartiality. Rota resilience and contingency cover may be harder to sustain, and specialist safeguarding and online safety expertise could be diluted across successor bodies. There is also a risk of inconsistency in safeguarding and online safety advice to education settings. Income generation from traded activity, which exceeded target in 2025-26, may reduce because current rota and statutory cover arrangements underpin the ability to deliver the traded offer at scale.

Interdependencies

- Shared countywide Liberi database holds LADO and safeguarding records.
- SLA with The Education People for training delivery (expiry 2028).
- Single point of contact with Ofsted, DfE and CDOP.

Next Steps/ Actions

Now
Map specialist staffing and clarify the novation route for the Education People SLA.

Next
Scope Liberi separation, information governance and ownership of the traded training income.

Future
Sustain LADO impartiality, rota resilience and specialist expertise at reduced unitary scale.

Scope:
Management Information (Early Years and Education) is a countywide enabling service providing data management, reporting, systems administration, and analytical support for Early Years, Education, SEND, Attendance, NEET, Youth Justice, and Family Hubs.

Does Disaggregation by default apply to this service? Yes

Why?
The assessment highlights transition complexity and implementation risk, including capability duplication and reduced economies of scale, rather than any fundamental barrier to disaggregation. Integrated systems, contracts, statutory reporting and specialist workforce dependencies would need reconfiguration, but none are legally, contractually or operationally incapable of separation. The Synergy and Core+ contract, in place until December 2028, represents the primary transitional dependency, requiring migration, licensing reconfiguration and reporting redevelopment.

1.1.10 Management Information (Early Years and Education)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (G)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in assets and systems, where Synergy and Core+ underpin Early Years, Education, SEND, Youth Justice, Family Hubs, NEET and related reporting, with a single supplier contract running to December 2028. Data architecture, reporting frameworks and specialist licences (Microsoft Fabric, Captivate, Camtasia) have been built up over years and are not readily divisible. Staffing complexity is material: senior expertise cannot easily be divided or duplicated, and recruitment for data engineers and analysts is difficult. Demand complexity is driven by 40 statutory returns per year, several of which are resource-intensive, and the volume could rise substantially under LGR. Budget flexibility is limited by DSG grant dependency and a small £25k non-staffing budget. Legislative complexity is heightened by three concurrent reform programmes (Families First, Children's Wellbeing and School Act 2026, SEND reforms) landing within the LGR window, alongside safeguarding and information governance responsibilities embedded in systems.

What are the potential risks of disaggregation that need to be considered?

The most significant risk relates to statutory reporting continuity, with workloads potentially increasing by up to five times depending on the number of successor authorities established, with no proportional uplift in specialist supply, creating a material risk of non-compliance during transition. Safeguarding and information governance responsibilities are embedded in systems and processes, and additional LA boundaries increase risk where families move across boundaries, requiring redesigned data-sharing agreements with Health and Police partners. System separation would trigger data migration, reconfiguration, retraining and redevelopment of reporting; if a successor LA awards to a different supplier, all information would need migration, all processes rebuilt from scratch, and all reporting rebuilt, representing significant operational risk across CYPE. Duplicating central capability across multiple unitaries would erode existing economies of scale, with limited non-staffing budget to absorb additional system, licensing or transition costs.

Interdependencies

- All CYPE services rely on Management Information for data support.
- Corporate dependency on Governance and Technology teams for information governance and infrastructure.
- Service uses Synergy and Core+ systems (contract in place until Dec 2028) and specialist software licenses (Microsoft Fabric, Captivate, Camtasia).
- Health and Police partners for secure information sharing.

Next Steps/ Actions

Now

Map Synergy and Core+ contractual constraints on data separation, migration and novation before March 2028. Agree the minimum MI staffing model needed to sustain statutory reporting in each successor authority.

Next

Plan system migration, licensing and reporting rebuild ahead of Vesting Day.

Future

Align design with Families First, CWS Act 2026 and SEND reform timelines.

Scope
Management Information (Early Help and Social Care) is a countywide, in-house function within CYPE that provides systems administration, data management, statutory reporting, training and performance analysis for Children's Social Care and Early Help services.

Does disaggregation by default apply to this service? Yes

Why?
As an enabling function, Management Information supports CYPE services rather than residents directly; where services disaggregate, systems, data, and reporting must follow. While there are no hard barriers to disaggregation, there are implementation challenges relating to transitioning systems, data, statutory reporting and specialist workforce capacity, particularly within the Liquidlogic estate. The assessment indicates that continuity and compliance could be supported through temporary transitional arrangements such as shared hosting, joint contract management or lead-authority models.

1.1.11 Management Information (Early Help and Social Care)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is primarily driven by concentrated specialist expertise, a highly configured systems landscape and the scale of statutory reporting requirements, all assessed as Amber. The principal challenge relates to assets and systems, particularly the Liquidlogic suite supplied by System C under contract until March 2028, where separation of data, configurations and reporting environments would be highly complex. Workforce risks arise from reliance on a senior, specialist team and recruitment challenges in data and analytics roles. Additional complexity stems from supporting specialist services and replicating statutory reporting across successor authorities. Delivery is currently provided through a single in-house model with extensive dependencies across corporate, partner and regional services, requiring multiple new interfaces and governance arrangements to be established.

What are the potential risks of disaggregation that need to be considered?
The most significant consequence of disaggregation is the substantial increase in statutory reporting requirements, with successor authorities each needing to produce statutory returns currently submitted once at county level, creating significant additional resource demand. Safeguarding risks may also increase where families move across authority boundaries, necessitating robust information-sharing arrangements and secure migration of children's records. System separation presents a major operational challenge, particularly where alternative technology suppliers are adopted, requiring data migration, process redesign, staff retraining and redevelopment of reporting frameworks. Workforce resilience is a further concern given existing recruitment difficulties in specialist data roles. Concurrent national reforms, including the Families First Partnership Programme, the Children's Wellbeing and Schools Act 2026, and SEND reforms, are expected to place additional demands on organisational capacity, potentially reducing the resources available to support transition activity.

Interdependencies

- All CYPE services rely on Management Information for data support.
- Corporate dependency on Governance and Technology teams for information governance and infrastructure.
- System C contract (Liquidlogic) in place to March 2028.
- Health & Police partners for secure information sharing.
- LA partners: Medway/Bexley via Regional Adoption Agency.

Next Steps/ Actions

Now
Map System C contractual provisions constraining data separation, migration or novation before March 2028. Agree the minimum MI staffing model needed to sustain statutory reporting in each successor authority.

Next
Plan system migration, licensing and reporting rebuild ahead of Vesting Day.

Future
Align design with Families First, CWS Act 2026 and SEND reform timelines.

Scope:
Out of Hours is a statutory countywide safeguarding service operating outside office hours across Kent and Medway, covering children's and adults' services. Delivered in-house by senior social work practitioners, it responds to child protection and adult safeguarding concerns.

Does Disaggregation by default apply to this service? No - Whole

Why
Out of Hours should remain countywide because it provides continuous statutory safeguarding response across children's, adults' and Kent Intake functions, supported by flexible deployment and key partner agreements. Disaggregation would risk resilience and continuity. Continued countywide provision is the strongest recommended model.

1.1.12 Out of Hours (OOH)

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the three Red drivers of Demand, Delivery Model and Legislative basis. Demand is countywide and cross-boundary, with higher volumes in Swale, Thanet and parts of West Kent, and a distinct specialist UASC demand tied to the Dover port. The delivery model is a single centralised in-house social work function that relies on flexible redeployment of staff, with multiple arrangements with other services and partner organisations. Legislatively, OOH operationalises statutory duties under the Children Acts 1989 and 2004, the Care Act 2014, the Mental Capacity Act 2005, the Mental Health Act 1983 and Working Together 2026, all of which require continuous availability and multi-agency cooperation. Amber drivers include the skill and experience of the staff and a combination of budget funding streams and shared assets.

What are the potential risks of disaggregation that need to be considered?
A single countywide threshold document currently ensures consistent application of safeguarding thresholds, and disaggregation carries a risk of multiple, divergent thresholds across successor unitaries. Cross-boundary challenges around responsibility and transfers are also flagged, alongside duplication of roles currently delivered at scale and the loss of a single point of access for help and protection. Recruitment and retention could be affected by differing unitary policies on flexibility, pay and conditions, given the service depends on senior practitioners with significant post-qualifying experience. Disaggregation would require unpicking contractual arrangements with Medway, the SLA with Adult Social Care, and partnership arrangements with police and the Home Office, with consequences for continuity of the 24/7 safeguarding response and for the specialist UASC function linked to Dover.

Interdependencies

- Medway Council contract covers children's and adults' out-of-hours response.
- KCC Adult Social Care system access under SLA for safeguarding.
- Shared Nimbus/Luware telephony and case systems with Front Door.
- Kent Police and Home Office partnership for the Dover Unit.

Next Steps/ Actions

Now
Confirm a continued countywide OOH arrangement as the recommended pathway.

Next
Map the Medway, Adult Social Care, police and Home Office contracts and systems.

Future
Sustain 24/7 specialist cover, consistent thresholds and the Dover-linked UASC response.

Scope:
The Principal Social Worker (PSW) function provides professional leadership, statutory safeguarding oversight, quality assurance and system-wide learning across Kent's children's social care. It oversees safeguarding alerts, Rapid Reviews and National Panel referrals and contributes to Local Child Safeguarding Practice Reviews. Delivery is in-house and countywide within CYPE Countywide Services.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. Although it carries complexity around unpredictable countywide safeguarding demand, a centralised model, specialist workforce and statutory duties, assessment judges these manageable rather than blockers. Amber ratings across Demand, Delivery Model, Staffing and Legislative Basis signal transition-planning considerations, not fundamental barriers.

1.1.13 Principal Social Worker

Complexity Driver RAG Assessment			
Demand (A)	●	Delivery Model (A)	●
Staffing (A)	●	Budget (G)	●
Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Countywide, reactive and unpredictable demand is the first factor: activity is triggered by safeguarding thresholds, statutory processes and critical incidents such as serious harm or child death notifications, which require immediate PSW involvement regardless of location and do not follow stable geographic patterns. The centralised delivery model adds further complexity, as capacity is flexibly deployed in response to safeguarding risk rather than aligned to fixed localities, and interdependencies exist across Integrated Children's Services and with multi-agency partners. Staffing complexity arises from a small cohort of highly specialist, professionally regulated social workers with system-wide responsibilities. Legislative complexity reflects statutory guidance emphasising consistency, independence of oversight and effective multi-agency coordination, which disaggregation could put at risk through variation, duplication and reduced system oversight.

What are the potential risks of disaggregation that need to be considered?

The primary risk is variation in practice between areas, duplication of processes and reduced safeguarding oversight if disaggregated without strong coordinating arrangements. A related consequence is a potential reduction in efficiency, effectiveness and independence of professional judgement under local operational pressures, alongside loss of economies of scale currently secured through a countywide function. The Legislative commentary reinforces this, noting that a move to a multiple unitary model would mean the PSW function has to be duplicated for each local authority area, with attendant governance and consistency implications. Countervailing opportunities include closer links to practitioners, greater local visibility and stronger understanding of local context in an area-based model.

Interdependencies

- Internally links operational teams, quality assurance, commissioning and workforce development.
- Specialist capacity drawn from posts budgeted across service areas.
- Multi-agency partners: police, health, education and KSCMP for safeguarding.
- Partnership information-sharing and governance enable oversight, learning and assurance.

Next Steps/ Actions

Now

Map interdependencies with Integrated Children's Services and multi-agency safeguarding partners.

Next

Resolve the establishment mismatch and confirm single-function budget arrangements.

Future

Sustain specialist leadership, consistent safeguarding standards and independence of professional judgement.

Page 90

Scope:

Practice Development strengthens practice quality, consistency and statutory compliance by embedding Kent's Practice Framework across Integrated Children's Services, delivering workforce development, training, audits, evaluations, policy and guidance for practitioners, managers and services.

Does Disaggregation by default apply to this service? Yes

Why?

Delivery is in-house, countywide and funded from a single budget, with no area-based allocation, specialist systems, assets or contractual constraints. The small, senior workforce has no recruitment or retention issues, and QA frameworks underpin Ofsted and HMIP inspection readiness.

1.1.14 Practice Development

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

The main implementation consideration evidenced is the service's business-critical reliance on internal support functions (such as Management Information Unit, Kent Analytics) which underpin its audit, evaluation and quality assurance activity. The service also operates across a wide multi-agency footprint, including all 56 Family Hubs and statutory partnerships such as KSCMP and the county Domestic Abuse strategic group, meaning any split would need to preserve coordinated access to data, analytics and partnership arrangements. Beyond these coordination points, no critical complexity factors are evidenced; the service otherwise appears straightforward to split.

What are the potential risks of disaggregation that need to be considered?

There is a risk of inconsistent practice across Kent if independent guidance and oversight are lost, with a corresponding risk to the consistency of practice standards and to safeguarding assurance across successor areas. Reputational risk is flagged in relation to Ofsted and HMIP inspections, alongside possible service disruption affecting inspection readiness and quality assurance activity. Dividing specialist skills and staff resources could erode economies of scale, and smaller successor QA teams would need broader skill sets to cover the same functions. Workforce instability and loss of highly experienced quality assurance staff are also identified as consequences. The assessment also notes opportunities, including stronger multi-agency working, greater integration across health, housing and social care learning, and more focused learning within smaller safeguarding partnerships.

Interdependencies

- Business-critical reliance on MIU and Kent Analytics
- Countywide working across Family Hub, Early Help and all Children's Social Work Services.
- Principal Social Worker linkage on safeguarding alerts and reviews.
- External partnerships with Police, Health, Education and voluntary sector and KSCMP.
- Domestic Abuse group and statutory MAPPA, MARAC, MATAC, DHRs, DARDs.

Next Steps/ Actions

Now

Map interdependencies with internal services, external partners and baseline demand.

Next

Agree governance, budget apportionment and reconfigured data access across successor organisations.

Future

Preserve specialist QA skills, workforce stability and effective learning within smaller partnerships.

Scope:
In-house residential care for children and young people with complex behavioural, neurodevelopmental, mental health and emotional needs who cannot be supported safely in family or foster settings. It comprises The Lodge, a tri-funded specialist unit with a Multi-Disciplinary Team, and Project Athena's new KCC-run homes. Delivery is countywide.

Does Disaggregation by default apply to this service? Part

Why?

Disaggregation applies only partially. Each residential home is a fixed, registered, specialist premises whose staff and funding cannot be internally divided, so it must transfer as a whole. The recommended pathway is a continued countywide arrangement with shared asset access, though whole homes could alternatively be allocated, retained in-house, built or commissioned.

1.1.15 Residential Children’s Homes

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (R)	●	Assets/ Systems (R)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the interlock between the physical assets, the workforce and the funding envelope, in particular the complexity of Project Athena as a new in-houseresidential home project, with DfE as part funder. Each home is a specialist, individually registered premises with bespoke safety, anti-ligature and security infrastructure that cannot be relocated, and specialist equipment is tied to individual children's risk profiles and Ofsted compliance. The workforce (Registered Managers, senior residential practitioners with autism and behavioural expertise, and specialist behavioural roles supporting Athena)is attached to each home and cannot be redistributed without destabilising provision, against a backdrop of national recruitment and retention difficulty. Budgets are managed centrally and aligned to individual homes rather than geography, and The Lodge in particular depends on a tri-funded MDT arrangement with the ICB and a Provider Collaborative that is exposed to ongoing ICB change. Demand is countywide, non-uniform and driven by individual need rather than geography, so any split of the service must reconcile fixed asset locations with fluctuating, cross-boundary placement demand.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies loss of scale as the central consequence, with fragmentation of sufficiency planning and placement pathways where demand is countywide and children are often placed away from their home area. Workforce risk is highlighted as material, particularly for Registered Managers and specialist roles, with Athena expansion noted as increasing that risk if provision is fragmented across multiple authorities. Maintaining the MDT arrangements that underpin The Lodge is flagged as a specific concern. There is anincreased financial and regulatory burden across multiple authorities, given that registration, inspection and regulatory requirements apply to each home individually. Set against this, there areopportunities for closer alignment with local health and community services, and flexibility to shape Athena provision, but only where sufficient scale is maintained and delivery remains part of a coherent system.

Interdependencies

- Children's Social Care for admissions, care planning and safeguarding.
- KEPS, behavioural, Education and SEND services around each child.
- NHS, ICB and Provider Collaborative fund The Lodge MDT.
- DfE grant funds Project Athena; Ofsted registers each home.

Next Steps/ Actions

Now
Confirm remaining Athena sites, host authority footprint, workforce and grant conditions.

Next
Decide whole-home allocation, shared in-house function or new provision, and Lodge funding treatment.

Future
Sustain placement sufficiency, specialist workforce and MDT health partnership across successor authorities.

Scope:
Planned and emergency short breaks for children and young people with disabilities and complex needs, including autism, learning disability, health needs and behaviours that challenge. Provision is countywide from five specialist in-house residential-style units (Ashford, Dartford, Southborough, Detling, Herne Bay), offering overnight and extended stays that support family sustainability.

Page 22
Does Disaggregation by default apply to this service? No

Why?
Short Breaks should remain countywide because its integrated delivery model, specialist workforce, pooled health funding and fixed specialist assets cannot be safely replicated across authorities. A phased approach may localise some activity later, but the strongest recommendation is to retain shared countywide arrangements for core functions and assets.

1.1.16 Short Break Services

Complexity Driver RAG Assessment					
Demand (R)		●	Delivery Model (R)		●
Staffing (G)		●	Budget (A)		●
Assets/ Systems (R)		●	Legislative (G)		●

Complexity Overview

What makes this service complex to disaggregate?
Demand is countywide but uneven and capacity-constrained, with highly individualised needs that reduce standardisation and tie access to a small number of specialist units. The delivery model integrates fixed-site provision with centralised commissioning, quality assurance, behavioural support, and flexible staffing, meaning that operational stability depends on coordination across the whole footprint. Budget complexity is driven by centrally managed funding and integrated NHS contributions through Section 75 pooled budgets and Section 256 transfers, which vary historically by location. Assets are highly specialised residential-style buildings essential to overnight care, with one site (Treetops, Dartford) owned by the NHS, creating cross-organisational dependency. Together, these drivers indicate that the whole service, rather than a specific component, resists a straightforward split.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies fragmentation of specialist provision and loss of economies of scale as primary consequences of disaggregation, with direct implications for the sustainability of a small, specialist footprint. Managing Section 75 and Section 256 funding arrangements across multiple authorities is explicitly flagged as increasing financial and partnership complexity. Workforce instability and reduced resilience are identified risks, reflecting the specialist skills required and existing recruitment and retention challenges in a competitive market. Increased safeguarding and regulatory burden is noted, as Ofsted registration and compliance obligations would apply independently at each unit. The assessment also identifies opportunities where managed carefully, including closer alignment with local family support and Families First arrangements, and enhanced integration with community-based services. The recommended countywide arrangement is presented as a way to mitigate these consequences by preserving coordinated oversight.

Interdependencies

- Children's Social Care, SEND, safeguarding and care planning for referrals.
- Centralised commissioning, workforce planning, QA and behavioural support across units.
- NHS Section 75 pooled budgets and Section 256 transfer funding.
- NHS-owned Treetops building creates cross-organisational governance for a specialist asset.

Next Steps/ Actions

Now
Map specialist staff transfer, Section 75/256 treatment, Ofsted continuity and system licences.

Next
Confirm continued countywide arrangement, shared-function governance and Treetops site ownership.

Future
Sustain minimum viable scale, equity of access and NHS joint-funding partnerships.

Scope:
The Strengthening Independence Service supports disabled children aged 0–17 across Kent, excluding Medway, assessing need, commissioning support, and delivering statutory social care and occupational therapy for children with severe or profound disabilities, including those in need, in care or on child protection plans.

Does Disaggregation by default apply to this service? Yes

Why?
There is no strong reason against disaggregation. The five area teams already align to districts and could re-align to successor authorities, with itemised staffing budgets aiding allocation. Countywide Sensory and OT teams, shared systems, centralised commissioning and cross-boundary assets are transitional constraints, while workforce and specialism risks are consequences to manage.

1.1.17 Strengthening Independence Service

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (R)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is driven by the hybrid operating model. Alongside the five area-based teams, the Sensory and Occupational Therapy teams operate countywide and are not attributed by area, and a substantial spine of centralised functions. Several area teams span more than one district grouping; North covers Swale, Dartford and elements of Gravesham; West 2 covers Maidstone, West Malling and elements of Gravesham so caseload re-attribution would be required where team footprints cross proposed unitary boundaries. The service relies on shared, business-critical case-management and payment systems (Liberi and ControCC) operated centrally for the whole service, and on cross-boundary physical assets including KCC-owned Multi Agency Hubs in Sittingbourne, Ashford and Margate, Short Break Units in Maidstone, Ashford, Tunbridge Wells, Dartford and Herne Bay, and borough-owned bases in Dover and Gravesham. A professionally regulated workforce (Social Work England and HCPC) with existing recruitment pressures adds a further layer of implementation complexity.

What are the potential risks of disaggregation that need to be considered?
The main consequences relate to workforce, specialist depth and cross-boundary continuity. Splitting a single countywide workforce is expected to reduce the internal pool of viable management candidates with existing recruitment difficulty for Social Workers (particularly Tunbridge Wells) and experienced Occupational Therapists (particularly West Kent) likely to be intensified by pay competition between reformed councils, especially in areas bordering London and other counties. Specialism may be diluted where a large countywide workforce currently allows peer support and shared specialist roles, illustrated by a single Deprivation of Liberty Safeguards Social Work Assistant supporting all four teams. Statutory responsibility for children in care placed outside Kent and Medway remains with the originating team, and disaggregation will need to determine how this cross-boundary statutory responsibility (including significant travel time for statutory visits) is allocated between successor authorities. Sensory Services is already under review due to a decline in hearing-impaired children, with a potential sixth team and specialism model being considered, and disaggregation would need to account for that in-flight configuration change.

Interdependencies

- Centralised commissioning and business functions across Liberi, EHM, ControCC.
- Shared Multi Agency Hubs and Short Break Units.
- NHS therapies, health assessments, CAMHS and Dynamic Support Service.
- District councils for Disabled Facilities Grants and staff bases.

Next Steps/ Actions

Now
Map area-team and management boundaries against proposed unitary geographies and assets.

Next
Agree caseload re-attribution, out-of-Kent responsibility and shared system separation options.

Future
Design successor models sustaining specialist depth and countywide Sensory and OT.

Scope:
The UAS CS Social Work Service provides initial assessment, safeguarding and statutory social work support to newly arriving unaccompanied asylum-seeking children referred to KCC via the Home Office's Kent Intake Unit at Dover, until transfer under the National Transfer Scheme or into mainstream services. Delivery is in-house and countywide.

Does Disaggregation by default apply to this service? No

Why?
The UAS CS Social Work Service should retain centralised intake, coordination and safeguarding because Kent's point-of-entry role, high-risk demand and national system interfaces make full disaggregation unsafe without further analysis. Estate or downstream elements may be phased later, but the core function should remain shared.

1.1.18 UAS CS Social Work Service

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the Demand and Delivery Model dimensions. All new UAS referrals enter through a single Home Office site at KIU, Dover, with episodic cohort arrivals at short notice and limited prior information, requiring immediate safeguarding capacity that is difficult to replicate across multiple authorities. Delivery is in-house and countywide, anchored at KIU and across a network of ten reception centres, with two of six teams based at KIU and redeploying to reception centres when there are no arrivals. Operational presence in the Home Office building requires security clearance, and safeguarding is delivered through integrated working with Police, Health, the National Referral Mechanism, the Independent Child Trafficking Guardian Service and Kent Police Missing and Exploitation Teams. Amber-rated Staffing adds a place-specific deployment need at Dover while Amber-rated Assets/Systems reflect locality-tied estate and the complexity of multi-agency information and data sharing.

What are the potential risks of disaggregation that need to be considered?
The principal risk is that disaggregation could lead to insufficient ring-fenced placement provision and to National Transfer Scheme transfer times consistently exceeding the mandated ten working days recreating the pressures that previously gave rise to legal challenge. The NTS must operate effectively, if it does not the authority responsible for the Dover point of entry would carry disproportionate demand, which the successor design will need to mitigate through funding and placement arrangements. Disaggregation of the KIU-based intake function would require coordinated handling of the Home Office interface, safeguarding partnerships and shared estate, with sequencing consequences across reception services, placements and transfer processes. The dependency between intake and placement availability may affect system-wide performance during and after transition. Sensitivity to future national UAS policy adds a further consequence, as the eventual operating model may need to adapt to policy change before 2029.

Interdependencies

- UASC reception centres hosting four of the six teams.
- Care Leavers Service and centralised MI, QA, safeguarding, commissioning.
- Home Office intake, security clearance and grant funding at Dover.
- National Transfer Scheme, multi-agency trafficking partners and Connect2Kent agency supply.

Next Steps/ Actions

Now
Map placement sufficiency, NTS risks, Home Office site access and data-sharing protocols.

Next
Confirm KIU intake allocation, reception-centre ownership and Home Office governance across unitaries.

Future
Design a sustainable workforce replacing agency reliance and replicate centralised functions.

Scope:
The UASC Reception and Safe Care Service accommodates and immediately supports all newly arrived unaccompanied asylum-seeking children in Kent, delivering KCC's Section 20 duties. It operates countywide and in-house through 10 Ofsted-registered reception centres (4 Children's Homes, 6 Supported Accommodation sites), working alongside UASC Social Work and Out of Hours.

Does Disaggregation by default apply to this service? No

Why?

The whole service is not suitable for disaggregation by default. Demand is volatile and externally driven by Channel crossings and National Transfer Scheme performance, needing immediate specialist safeguarding at Kent's entry point. Delivery is centrally coordinated and countywide, with a 50% agency, visa-dependent, regulated workforce. The recommended pathway is 'Other', pending analysis of Dover-authority ownership.

1.1.19 UASC Reception Safe Care Service

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in the Red-rated Demand and Delivery Model drivers. Demand is highly volatile, seasonal and shaped by external factors -Channel crossings and the reliability of the National Transfer Scheme, with the assessment noting that forecasting is 'extremely difficult to predict.' The delivery model is countywide and centrally coordinated, dependent on real-time multi-agency coordination with the Home Office, DfE, NTS, Police and Health, and on centralised Facilities Management, Safeguarding, QA and MI support. Amber-rated Staffing adds further complexity through a 50% agency workforce, visa/sponsorship dependencies, recruitment challenges in rural East Kent, and the specialist Level 5 qualification required for Ofsted-registered Managers. Amber-rated Assets/Systems reflect a distributed regulated estate of 10 reception centres with varied capacity and operational readiness (including Memona Lodge in refurbishment until November 2026 and Peacock House opening June 2026) that cannot be substituted with standard office provision. Amber-rated Legislative complexity arises from Section 20 duties under the Children Act 1989, Ofsted regulation of both Children's Homes and Supported Accommodation, and the need for continuous multi-agency safeguarding coordination.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies two directly evidenced risks: insufficient capacity leading to an inability to accommodate all UAS children safely, and delays in the National Transfer Scheme exceeding 10 working days. Both are material because they affect statutory continuity and the safeguarding of a highly vulnerable cohort. There is a specific consequence if the NTS does not operate effectively, with the unitary which includes Dover coming under greater pressure, given Kent's point-of-entry role. The assessment notes that a continuing countywide arrangement would carry both operational and governance complexities that any successor model would need to resolve, particularly regarding which authority holds responsibility for the Dover point of entry meaning any alternative pathway carries its own consequences that will need to be worked through. Continued Home Office grant funding underpins financial sustainability, so any change to organisational arrangements will need to preserve grant alignment and capacity assumptions modelled by the Home Office.

Interdependencies

- UAS CS assessment service — the primary interdependency.
- UAS CS Social Work and Out of Hours for referrals, safeguarding.
- Centralised Facilities Management, safeguarding, QA, MI and Connect2Kent agency staffing.
- Home Office funding, National Transfer Scheme, DfE, Ofsted, Police, Health.

Next Steps/ Actions

Now

Map estate ownership and access across 10 sites; plan workforce and agency transfer.

Next

Confirm reception-centre ownership near Dover, minimum safe scale and Home Office funding continuity.

Future

Sustain workforce, Registered Manager replication and coordination with Home Office, NTS, DfE.

Scope:
Virtual School Kent provides leadership and support to improve educational outcomes for Children in Care, previously looked-after children and children with a social worker, from early years through post-16. It advises, trains and challenges schools, colleges and partners. Delivery is predominantly in-house via four area teams plus countywide specialist teams.

Page 26
Does Disaggregation by default apply to this service? Yes

Why?
VSK appears capable of disaggregation with conditions. Its four-area Children in Care spine, supported by area-based Early Years, Attendance and Foster Carer Support, already aligns with geographic disaggregation. Uneven demand is managed flexibly rather than by rigid boundaries. Legislation requires each successor authority to establish the statutory Virtual School Head.

1.1.20 Virtual School Kent

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Staffing is the defining constraint: a small senior leadership cadre requiring QTS and headship-level credentials that is evidenced as scarce nationally, slow to grow and not readily scalable, with the statutory requirement for every successor authority to appoint a VS Head increasing demand for these roles. Demand is uneven, weighted towards East Kent coastal and urban districts and parts of North Kent span highly complex cohorts and is projected to rise through the statutory extension to all children with a social worker. The hybrid delivery model combines an area-based CIC spine with countywide specialist teams that operate at county scale and would require explicit consideration. Budget complexity arises from multi-stream, substantially grant-dependent funding (£2.6m KCC core, £5.56m DfE grants) that would need apportioning between successors. Legislative complexity stems from the statutory VS Head duty in every authority, extensive embedded safeguarding and corporate parenting obligations, and the forthcoming enactment of the Children's Wellbeing and Schools Act 2026.

What are the potential risks of disaggregation that need to be considered?
Loss of economies of scale is a primary consequence, with county-scale operation currently enabling efficient use of specialist expertise, shared systems and consistent standards, and disaggregation risking duplication, higher overheads and loss of critical mass. Dilution of specialist expertise is a material workforce consequence: a small number of highly qualified leaders spread across successor authorities would weaken professional challenge and system-wide impact, and simultaneous recruitment would increase competition and retention risk. Loss of coherence and consistency is highlighted, with fragmentation risking inconsistent thresholds and inequitable access depending on where a child lives. Financial and budgetary risk under a unitary model reflects reliance on multiple funding streams and varying authority capacity and priorities. Increased safeguarding and stability risk is flagged, with fragmentation risking weaker oversight, slower escalation and disrupted relationships. The assessment also evidences a sufficiency and out-of-county consequence, with out-of-county attendance modelled to rise from 12% to 57% (64% with an EHCP), threatening sufficiency, inclusion, safeguarding and cost control.

Interdependencies

- Corporate parenting and safeguarding partners: KSCMP and children's social care.
- Wider KCC services: SEND, KPAS, KEPS, PAS and YJS.
- Liberi case management; records separation and licensing across successors.
- DfE grant streams, education providers, therapy and tuition contracts.

Next Steps/ Actions

Now
Plan Liberi records separation, map area team staff and baseline grant streams.

Next
Establish statutory VS Head per successor and apportion DfE grants and countywide teams.

Future
Preserve senior leadership resilience, specialist expertise and integration with SEND and social care.

Table of Contents – CYPE – Education and SEND

1.2 Education and SEND

[1.2.1 Area Education Teams \(North, East, South, West\)](#)

[1.2.2 Area EHC Casework](#)

[1.2.3 Children Missing Education](#)

[1.2.4 Community Learning Service](#)

[1.2.5 Coordinated Admissions](#)

[1.2.6 Countywide Assessment and Placement Service](#)

[1.2.7 Early Years SEN Support and Inclusion](#)

[1.2.8 Ed-Spark \(Virtual Learning Platform\)](#)

[1.2.9 Education Lead Adviser](#)

[1.2.10 Education Resources and Planning](#)

[1.2.11 Educational Psychology](#)

[1.2.12 Elective Home Education](#)

[1.2.13 High Needs Funding and Monitoring Officers \(Part of SEN Support and Inclusion\)](#)

[1.2.14 Home to School Transport](#)

[1.2.15 In-year Admissions](#)

[1.2.16 Kent and Medway Communication and Assistive Technology \(KM CAT\) Service](#)

[1.2.17 Kent Pupil Referral Units \(PRU\) and Attendance Service](#)

[1.2.18 Phase Transfer including Phase Transfer Data Coordination Team](#)

[1.2.19 SEND Business Support](#)

[1.2.20 SEND Finance](#)

[1.2.21 SEND Home to School Transport](#)

[1.2.22 SEND Quality Assurance and SEND Strategic Development](#)

[1.2.23 SEN Inclusion Advisers for Mainstream Schools and Independent and Non-Maintained Special Schools and Post 16/19 Providers \(part of SEN Support and Inclusion\)](#)

[1.2.24 SEN Therapies \(part of SEN Support and Inclusion\)](#)

[1.2.25 Specialist Learning and Teaching Service](#)

[1.2.26 Specialist Teaching for Sensory and Physical Disabilities](#)

[1.2.27 The Education Programme \(in-house tuition\)](#)

[1.2.28 Tribunals](#)

Return to table of
contents

Scope:
Area Education Teams provide statutory local authority oversight, challenge and support to schools across Kent, helping raise standards, safeguard children and ensure sufficiency of school places. Delivered in-house through four area-based teams with countywide responsibilities, they coordinate school improvement, intervention, admissions, place planning, Early Years, Post-16 and related programmes.

Does Disaggregation by default apply to this service? Yes
Why?

There is no reason the service is unsuitable for disaggregation by default. Demand is broadly even, staffing and assets/systems are Green, and legislation specifies delivery at 'the area' without barring a geographic change. Barriers reflect service design rather than absolute constraints. Interdependencies with wider KCC services, KCC companies (notably TEP) and forthcoming reforms must be worked through during transition.

1.2.1 Area Education Teams (North, East, South, West)

Complexity Driver RAG Assessment					
Demand (G)		●	Delivery Model (A)		●
Staffing (G)		●	Budget (A)		●
Assets/ Systems (G)		●	Legislative (R)		●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the Red-rated Legislative basis and the Amber-rated Delivery Model and Budget. The service discharges an extensive statutory remit covering sufficiency, standards, intervention, SEND, 16–19 (and up to 25 for EHCP), early years entitlements, and civil contingencies, and the unknown but expected workload uplift from the Children's Wellbeing and Schools Act 2026, SEN Reforms, Schools White Paper and Curriculum Review sits against a small in-house team supported by an arm's-length delivery vehicle. The delivery model is hybrid, four area teams paired with countywide Assistant Director responsibilities and relies on centrally provided forecasting (Management Information, Kent Analytics, Edge Analytics), commissioned partners (The Education People via TEP, HR Connect), and multiple contracts including HAF, Wonde and the schools closure database. Budget complexity reflects centrally held, non-area-allocated funding that is pooled from multiple sources. These features do not prevent disaggregation, but they mean core analytical, commissioning and statutory coordination activity is not naturally replicated at area level.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies that specialist resource outside the area teams, particularly forecasting and analytics, is concentrated in small numbers of staff, creating fragility if split across successor bodies. Continued dependency on KCC companies (TEP, HR Connect) and the timing of future contractual arrangements is a material transition consideration. Disaggregating into smaller units would reduce resilience and viability, risk the loss of efficiencies from countywide Assistant Director responsibilities, and increase the breadth of skills required in each new structure, compounding existing recruitment difficulties. The assessment also notes a potential opportunity to improve coordination through integration with other services, with alignment feasible if a four-authority model is selected.

Interdependencies

- Centralised forecasting and analytics via Management Information and Kent Analytics.
- Infrastructure, Corporate Finance and GET for capital, budgets and planning.
- KCC companies The Education People (TEP) and HR Connect.
- Districts, neighbouring authorities and commissioned providers (Edge, HAF, Wonde).

Next Steps/ Actions

Now
Map contracts, novation routes and workforce allocation across area teams and functions.

Next
Confirm central forecasting configuration, TEP/HR Connect treatment and minimum viable team scale.

Future
Configure countywide functions and cross-boundary duties, addressing ADE recruitment in successor structures.

Scope:
 The Area EHC Casework Team delivers KCC's statutory duties under the Children and Families Act 2014 and SEN Code of Practice for children and young people aged 0–25 with special educational needs and/or disabilities, managing the EHCP annual review process and change-of-placement requests within statutory timescales. The service includes four area-based school age teams (North, East, South and West Kent), and a single countywide post16 team.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. Demand, staffing and delivery pressures are significant but uneven rather than indivisible, and budgets and staffing are already managed by area. The school age teams are well positioned to disaggregate as they already operate on an area basis, and the countywide post-16 team could transition to a similar area-based model if adequately resourced.

1.2.2 Area EHC Casework

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is driven by the uneven geographical distribution of demand. East Kent consistently records the highest caseload volumes across school-age, Post-16 and special school placement cohorts, while North Kent experiences extended periods of children being out of school, reflecting constraints in the availability of specialist provision. The hybrid delivery model, combining four area-based school age teams with a single countywide Post-16 team, introduces structural complexity because the Post-16 cohort would need to be geographically split and resourced. Staffing pressures compound this, with existing vacancies across the service and recruitment challenges linked to caseload intensity and pay competition with neighbouring authorities. Officers are not formally specialist but require strong working knowledge of the Children and Families Act 2014 and SEN Code of Practice, which must be preserved in any reconfigured structure. The statutory legislative framework necessitates continuity of provision, while the anticipated impact of the February 2026 Every Child Achieving and Thriving White Paper may generate a short-term increase in statutory EHCP assessment activity, potentially placing additional demand pressure on services during the transition period.

What are the potential risks of disaggregation that need to be considered?

The uneven distribution of demand presents a risk that newly established service footprints may be insufficiently resourced unless staffing allocations are realigned to reflect the higher caseload pressures evident in East Kent and within the countywide Post-16 cohort. In particular, replicating the Post-16 function across new area-based structures would require additional staffing and management capacity, which could exacerbate existing workforce pressures and reduce resilience during transition if not adequately resourced. These capacity risks could however be somewhat mitigated through the redistribution of staff, for example the transfer of staff where demand is lower or more manageable and reassigned to areas with greater demand.

Interdependencies

- Assessment and Placement Service determines statutory EHCP need.
- Phase Transfer Service manages transitions between education phases.
- Shared systems: Synergy, Core+ and Liberi.
- Medway cross-border placements.
- NHS partners provide diagnostic and assessment reports to update EHCPs.
- Service works with education providers, special schools.
- All placements are legal/contractual arrangements; annual rates require formal consultation.

Next Steps/ Actions

Now

Map staffing and vacancies against area demand profiles, including Medway. Ensure workforce is allocated in proportion to demand.

Next

Right-size post-16 staffing capacity within an area-based model if adopted. Look at contractual arrangements underpinning placements,

Future

Decide whether EHC Casework and Phase Transfer functions are combined into a single service.

Scope:
The Children Missing Education service is a statutory KCC service that identifies, tracks and secures suitable education for children of compulsory school age not in education. It works with families, schools and partners and undertakes safeguarding activity to reduce prolonged absence. The service operates countywide alongside In-Year Admissions and Elective Home Education as part of the Fair Access to Education model.

Does Disaggregation by default apply to this service? Yes
Why?

There is no evidence the service cannot be separated. Staff work flexibly across Children Missing Education, Elective Home Education and In-Year Admissions, but arrangements are integrated rather than indivisible. Delivery relies on standard systems (Synergy and Liberi) and the budget is entirely DSG-funded countywide. Fragmenting the integrated model and separating shared senior posts poses design challenges, not barriers.

1.2.3 Children Missing Education

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

The main complexity stems from the deliberately integrated and countywide operating model. Staff are employed into a single countywide pool and flexed between districts and across functions (Children Missing Education, Elective Home Education and In-Year Admissions) in response to fluctuating demand, with senior officer roles spanning all three functions. Demand is also unevenly distributed across the county. Swale, Maidstone, Thanet and Dartford have the highest case volumes, while East Kent accounts for over half (51.9%) of complex cases (non-relocation referrals), with many of these cases remaining open for more than 101 days and requiring intensive multi-agency safeguarding involvement. Delivery is tied to statutory duties under Section 436A of the Education Act 1996 and relies on timely cross-boundary information sharing and continuity of oversight, while the introduction of enhanced responsibilities through the Children's Wellbeing and Schools Bill 2026 will generate a programme of transformation activity that will need to be delivered concurrently with Local Government Reorganisation (LGR). Delivery is also underpinned by the Synergy and Liberi systems, which support case tracking and cross-boundary continuity for transient families. Together, these factors mean disaggregation is feasible but requires careful design to preserve staffing flexibility, statutory continuity and shared system coverage.

What are the potential risks of disaggregation that need to be considered?

Smaller successor authorities may hold reduced statutory leverage when issuing School Attendance Orders or challenging academy resistance to the Fair Access Protocol, raising the risk of placement drift for hard-to-place children. Loss of flexible staff redeployment across districts and functions would reduce the service's ability to absorb demand peaks, and duplicating senior posts (particularly the four Senior Access to Education Officers and the dual-hatted Children Missing Education/In-Year Admissions Coordinator) would inflate management overhead. Fragmented case tracking across new borders raises safeguarding continuity risks for transient families.

Interdependencies

- Integrated with Elective Home Education and In-Year Admissions.
- MIU (data support), KPAS (school roll deletions), ICS (safeguarding & Child Protection Conferences), and SEN (support for children with EHCPs).
- System dependency on Synergy and Liberi for case tracking and safeguarding continuity.
- Schools and academies (Fair Access Protocol).
- Multi-agency safeguarding partners, including Police (Operation Encompass).

Next Steps/ Actions

Now

Map split-role staffing capacity and clarify Synergy and Liberi licensing, data-sharing and separation risks.

Next

Decide whether successor authorities formally integrate the three functions (Children Missing Education, Elective Home Education and In-Year Admissions) as part of a single service.

Future

Design cross-boundary tracking systems and assess statutory registration and enforcement capacity responding to enhanced duties under the Children's Wellbeing and Schools Act 2026.

Scope:
Community Learning and Skills (CLS) is a CYPE service funded mainly by DWP Adult Skills Fund, DfE 16–19 grant and GLA, delivering re-engagement and skills courses countywide to adults and young people aged 16–18. Provision targets deprivation areas and cohorts facing barriers, including NEET, SEND, ESOL and unaccompanied asylum seekers.

Does Disaggregation by default apply to this service? Yes

Why?

There is no whole-service barrier to disaggregation by default: frontline delivery already operates by area and district, and most teams can be disaggregated by unitary. Complexity sits in enabling functions, MI and systems, funding compliance, Ofsted and exam regulation, and pooled contracts, not customer-facing delivery. Pooled, performance-dependent funding requires apportionment and risk-sharing, so disaggregation is supported subject to conditions.

1.2.4 Community Learning Service

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is driven by the centralised architecture that underpins hybrid delivery. Countywide MI (the bespoke UNITe suite), funding compliance, subcontract commissioning, Ofsted nominee arrangements and exam centre approvals all operate at scale. Budgets are pooled and performance-dependent, with clawback exposure on DWP and GLA income and a two-year lag on DfE 16–19 funding, making clean geographic separation of income and risk difficult. Staffing includes specialist and compliance-critical roles several identified as single points of failure and drawn from labour markets with national shortages. The estate spans main centres, leasehold sites and over 250 rented community venues, and JCQ exam rules impose non-negotiable proximity and secure-storage requirements. Medway operates a separate Adult Education service with different systems and governance, adding a further layer of operational unevenness.
What are the potential risks of disaggregation that need to be considered? The assessment identifies single points of failure in systems, loss of experience and short-term quality impact as the principal risks of separation. Brand identity and set-up costs for new websites and licences are also flagged. Vesting day falling mid-academic year is highlighted as a specific transitional risk, because funder data returns extend up to three months beyond 31st July, meaning some functions may need to remain centralised temporarily to protect income and compliance. Disaggregation would also likely require replication of statutory and regulated capability, including separate Accountability Statements, Ofsted Nominee arrangements and exam centre registrations, in each new authority, with associated duplication of systems, estates and specialist roles. The assessment equally records opportunities: potentially higher future quality, stronger local partnerships with DWP, colleges and the NHS, better alignment with local need, and scope for niche specialisation.

Interdependencies
• Social Care, TEP, Virtual Schools Kent and Reception Centres. • Centralised MI (UNITe), finance, QA and management span delivery. • Funders and regulators: DWP, DfE, GLA, Ofsted, JCQ, awarding bodies. • 13–16 DPS subcontractors, co-location partners and Medway Adult Education interface.
Next Steps/ Actions
Now Map single points of failure and plan compliant learner and funding data transfer. Next Confirm shared Day 1 functions, pooled-funding risk-sharing and UNITe MI arrangements. Future Retain specialist compliance capability, exam-centre coverage and NEET sufficiency at unitary scale.



Scope:
Coordinated Admissions is a statutory, in-house KCC service that manages applications for state-funded school places at Reception, Year 3 and Year 7, plus smaller admission rounds for Year 9 and University Technical Colleges-Year 10. The service also administers the Kent Test.

Does Disaggregation by default apply to this service? Partially

Why?
A continued countywide arrangement for the Kent Test is recommended, as its delivery depends on a single, coordinated process that would be difficult to replicate across multiple successor authorities without placing additional pressures on admission teams and introducing significant coordination challenges.

By contrast, the wider Coordinated Admissions service would be relatively straightforward to disaggregate. Funding is stable, roles are largely generalist, and assets and systems are limited and replicable.

1.2.5 Coordinated Admissions

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Demand is countywide and high volume, with heightened cross-border flows in North Kent (due to proximity to London Boroughs) and West Kent (bordering East Sussex, West Sussex and Surrey), while the Kent Test attracts up to 18,000 open-access applications annually. Delivery is provided countywide and depends on the Pan-London Coordinated Admissions Exchange with 38 constituent authorities. Workforce expansion will likely be required as the current team of 15 FTE represents a lean operating model for a county of Kent's size and is unlikely to provide sufficient capacity across multiple successor authorities. However, as roles are largely generalist and non-regulated, recruitment and workforce scaling is expected to be relatively manageable. The most significant operational challenge relates to the administration of the Kent Test. Disaggregation would require the replacement of a single, centrally coordinated process with multiple authority-led test arrangements, introducing greater complexity and the potential for reduced consistency and efficiency across the system.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies the main risks as loss of expertise and institutional knowledge, increased administrative burden and cost across multiple authorities, and the risk of fragmented or multiple grammar school tests. Disaggregation of the Kent Test could create duplication and system-wide coordination pressures and could result in children sitting multiple tests with clear wellbeing implications. Cross-border application volumes are likely to increase further as new unitary authorities are created across Kent and the wider South-East region, adding pressure on the Pan-London Exchange and on receiving teams in North and West Kent who are likely to receive additional applications from neighbouring authorities. Opportunities identified include new ways of working and more localised oversight of schools.

Interdependencies

- Contact Centre handle first-line enquiries during peak admissions periods (e.g. National Offer Day and Kent Test results day).
- Democratic Services manage school admission appeals.
- Synergy system is used to hold application & pupil data.
- Service works with Medway for cross-border applications and is part of the Pan-London Exchange.
- GL Assessment contract is used for delivery and marking of the Kent Test. Contract end date approaching, tendering activity underway.

Next Steps/ Actions

Now
Map workforce requirements and plan recruitment across successor authorities.

Next
Confirm each successor authority's intended approach to selective admissions and the future Kent Test model.

Future
Design a sustainable long-term model for coordinating cross-border admissions across multiple authorities.

Scope:
The Countywide Assessment and Placement (CAP) service, within KCC's Education and SEND Division, secures appropriate education provision for children and young people. It assesses need and coordinates placements through the statutory 20-week EHCNA process, supporting KCC's duties for vulnerable learners, including those with special educational needs and disabilities.

Does Disaggregation by default apply to this service? Yes
Why?

The service can be disaggregated by default. Although Demand, Delivery Model, Staffing and Legislative drivers are rated Red, these complexities are manageable through mitigation, not absolute barriers. The statutory 20-week EHCNA process, hybrid delivery, reliance on experienced managers and commissioned-service interdependencies raise transition risk but do not disqualify disaggregation. LGR offers an opportunity for redesign.

1.2.6 Countywide Assessment and Placement Service

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in four Red-rated drivers. Demand is rising rapidly and is unevenly distributed, with East Kent (particularly Swale) generating the highest volume, requiring the countywide flex of assessment staff. The delivery model is hybrid: assessment teams are nominally area-based but routinely operate countywide, placement staff are countywide due to capacity and demand, and quality assurance is provided by a central team using the Invision QA tool. Staffing complexity is driven by embedded specialist expertise in senior managerial roles (SEN Code of Practice, Equality Act, Children and Families Act), with a suggested six-month shadowing period for new managers and to reflect demand and capacity. Legislative complexity reflects the statutory 20-week EHCNA process and the impact of Education White Paper reforms and proposed EHC Plan banding, which will require transformation of the delivery model over the next 3 years.

What are the potential risks of disaggregation that need to be considered?
Disaggregation may require larger teams in each successor area to replace the current flexible deployment model, especially to sustain East Kent demand. Shared good practice and reactive capacity currently held across the countywide service would be at risk of loss. The assessment identifies that disaggregation could create risk to delivery of statutory 20-week timescales, fracture partnership working with commissioned services (Global Mediation, Kent Educational Psychology Service, SEND therapies, tuition services) and NHS partners, and disrupt cross-border and looked-after children placement arrangements with neighbouring authorities. These risks are compounded by proposed but unimplemented legislative changes, and by the possibility of interim service transformation prior to LGR. The assessment identifies a risk of variation in access and outcomes if disaggregated areas function inconsistently, particularly with regard to statutory decision-making.

Interdependencies

- KPAS, Admissions, Fair Access, Tuition, Transport and Children's Services links.
- Central QA (Invision tool) and Synergy case management system.
- Commissioned Global Mediation, KEPS and SEND therapies for EHCNA.
- NHS, independent special schools and other authorities for placements.

Next Steps/ Actions

Now
Map manager and placement-officer transfer and plan Synergy separation or shared access.

Next
Confirm 20-week EHCNA compliance, area staffing and commissioned-service treatment across successors. Look at the impact of SEND reforms and related transformation activity.

Future
Design sustainable area-based placement and succession planning for rising SEND demand.

Scope:
The service provides early support for children with special educational needs and disabilities from birth to five across Kent. It is delivered in-house through three teams: Portage Practitioners, SEND Support & Inclusion Practitioners (SIPs) and the SEN Inclusion Fund (SENIF) Finance and Monitoring teams. Together they offer specialist advice, training, targeted interventions and statutory inclusion funding to children, families and early years providers.

Does Disaggregation by default apply to this service? Yes

Why? The assessment found no fundamental barriers to disaggregation, with challenges relating primarily to implementation and transition. Demand patterns are well understood, the service is largely area-based, workforce sustainability is considered manageable, and DSG funding could be redistributed between successor authorities. Key risks relate to increasing capacity in the SENIF team beyond the current 5.2 FTE establishment, sustaining PRG coordination, and ensuring effective deployment of specialist staff and shared assets to support service continuity during transition.

1.2.7 Early Years SEN Support and Inclusion

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Five out of six complexity drivers were rated as Amber, reflecting cumulative implementation complexity rather than a hard barrier to disaggregation. Demand is geographically uneven, with concentrations in Swale, Canterbury, Thanet, Ashford, Maidstone and Tonbridge & Malling, meaning successor authorities will inherit different volumes and case complexity. The delivery model is predominantly area-based but relies on flexible deployment of staff across boundaries and integration with commissioned partners through the Professional Resource Group (PRG), which coordinates allocations for SIP, Outreach and SENIF provision. Delivery complexity is compounded by the requirement to review the PRG model as part of the national 'Experts at Hand' programme, with any resulting service redesign needing to be implemented within the next three years, creating concurrent change activity alongside the LGR timeline. Workforce complexity arises from the need for specialist qualifications, including Portage, SENCo and finance expertise, alongside challenges maintaining capacity in small teams, particularly the 5.2 FTE SENIF team. Recruitment pressures are evident in north-west Kent, notably Dartford, Gravesham and Sevenoaks, where competition from higher London pay rates affects workforce availability. Budget complexity is primarily linked to the statutory requirement to maintain an inclusion fund for early years providers through SENIF, which must continue under any disaggregation scenario. Asset complexity relates to reliance on non-office buildings, including Family Hubs, Multi-Agency Specialist Hubs, one Kent Community Health building and one special school, with ownership and access arrangements needing to be agreed during transition.

What are the potential risks of disaggregation that need to be considered?

Disaggregation would require the replication of management structures across successor authorities and may reduce the service's ability to deploy staff flexibly in response to changing demand. There is also a risk of inconsistency in SENIF arrangements between authorities and a dilution of capacity if the current 5.2 FTE team is divided across multiple organisations, potentially necessitating the recruitment of additional posts to maintain service resilience, expertise and operational capacity. A further risk is the potential loss of access to The Education People if successor authorities choose not to recommission the service, which could disrupt PRG referral and allocation processes.

Interdependencies

- Early Years Finance team manages budget determination and apportionment.
- SEN Support & Inclusion service supports transition into primary school.
- The Education People are integral to the PRG process, working with professionals such as Ed Psychologists and social care workers to coordinate referrals, allocations and funding decisions.
- Specialist systems: Synergy, internal Kent Portage Assessment System and InPrint licenses; specialist assets: Family Hubs and Multi-Agency Specialist Hubs.

Next Steps/ Actions

Now

Map SENIF budget allocations by district to inform apportionment across successor authorities. Clarify tenure and access rights for non-office assets (e.g. Family Hubs, Multi-Agency Specialist Hubs etc).

Next

Decide commissioning approach for The Education People to preserve the PRG referral and allocation process. Look at the impact of 'Expert at Hands' to the delivery model.

Future

Maintain multi-agency coordination across new unitary boundaries.

Scope:
Ed-Spark is a countywide, in-house virtual learning platform developed by KCC to support children and young people who cannot easily access traditional education, including looked-after children, learners with SEN and those who have been excluded. Though discretionary, the platform supports statutory education services across Kent.

Does Disaggregation by default apply to this service? No

Why
The service should not be disaggregated as there is insufficient scale for separate authority teams (low overall budget and scarce specialist resource). The platform is also dependent on a single, bespoke digital platform custom-built by KCC that would be difficult to replicate. A managed spin-out or shared-service model with sell-back arrangements is the strongest lower-risk alternative to disaggregation.

1.2.8 Ed-Spark (Virtual Learning Platform)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (R)	●	Assets/ Systems (R)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Staffing is limited to 3 FTE covering a specialist technical developer, systems architecture engineer, and SEN content lead; each role is mission-critical and the assessment notes these skills would be difficult to replicate across multiple unitary authorities. The budget is small, at circa £150k staffing and £150k non-staffing, giving the service very little critical mass to absorb any structural split. Assets and Systems complexity is driven by the fact that Ed-Spark is a bespoke platform developed entirely in-house, so ownership, intellectual property, licensing and future development responsibilities would all need to be resolved.

What are the potential risks of disaggregation that need to be considered?
The assessment states that if Ed-Spark were not delivered as a countywide offer it would likely cease to exist, removing a key source of support for statutory education services used by Early Help, Children's Social Work teams and Virtual School Kent. Financial fragmentation would leave successor services financially unsustainable at their reduced individual scale, given the low overall budget. From a workforce perspective, the loss of any of the three specialist roles is described as a substantial delivery risk, and there is no scale to build resilient stand-alone teams post-disaggregation.

Interdependencies

- Embedded across Early Help, Children's Social Care and education services.
- Virtual School Kent relies on the platform for vulnerable learners.
- No external dependencies at present, although future income model may add school and charity users. There are also plans for other LAs to purchase access, which would create contractual arrangements.

Next Steps/ Actions

Now
Confirm how dependent KCC services will maintain access to Ed-Spark.

Next
Resolve platform ownership, intellectual property, licensing and the future operating model including contract arrangements.

Future
Secure funding for ongoing platform development.

Scope:
The Education Lead Advisor is a countywide, in-house strategic role providing specialist professional advice and oversight across Kent's education system. It supports the Council in meeting statutory education duties, advising senior officers and working with schools, trusts and commissioned providers, and serves children, young people and the wider education workforce.

Does Disaggregation by default apply to this service? No

Why?

The Education Lead Advisor function could be redesigned rather than simply split, because it is a single countywide post with one Business Support. The recommended route is to absorb elements into senior education leadership or commissioned provision, while protecting accountability for education outcomes.

1.2.9 Education Lead Adviser

Complexity Driver RAG Assessment					
Demand (G)			Delivery Model (A)		
Staffing (A)			Budget (A)		
Assets/ Systems (G)			Legislative (A)		

Complexity Overview
What makes this service complex to disaggregate? Complexity is driven primarily by staffing, delivery model, budget and legislative factors. The role is delivered through a very small team, with specialist professional requirements (Qualified Teacher Status and sector experience) concentrated in a single Education Lead Advisor post and one Business Support; the assessment indicates that this small footprint would make disaggregation impractical and points instead to absorption into other education functions. Delivery is countywide and relies heavily on outsourced provision through The Education People (TEP) and on partnership arrangements with KALE, Pathways for All Strategic Board and the SACRE consultant, creating interdependencies that would need to be sequenced with any change. Budget complexity, while modest in value, is heightened by countywide non-staffing arrangements funded through the Designated Schools Grant, which are not allocated on an area basis. Legislative complexity is indirect: the role itself is not statutory but supports the Council in meeting statutory education duties, with forthcoming reforms (Schools White Paper, SEND Reform, Children's Wellbeing and Schools Act) shaping the operating context.
What are the potential risks of disaggregation that need to be considered? The primary risk identified by the assessment is a reduced focus on education, school improvement and outcomes for children and young people across the sector if the countywide oversight provided by the ELA role is diluted. The assessment reinforces this by noting that disaggregation would require either duplication of a highly specialist role or a fundamental redesign of statutory oversight and system leadership, with consequences for consistency, accountability and focus. Interdependencies with TEP and with countywide partnership arrangements (KALE, Pathways for All, SACRE) introduce further consequences for continuity of oversight during any transition. The assessment also frames an opportunity: integrating elements of the role into Assistant Director of Education roles and School Improvement roles within TEP, but the consequence of that route is a shift from a distinct system-leadership post to a distributed model whose accountability arrangements would need to be defined.

Interdependencies
- Operational interdependency with education services contracted to TEP. - Relies on centralised commissioning, finance and MIU support. - KALE partnership to August 2027 and Pathways for All MoU. - SACRE consultant contract and DfE statutory guidance.
Next Steps/ Actions
Now Assess immediate risks to school improvement outcomes flagged in the assessment. Next Decide whether to integrate the ELA role Future Design a sustainable education system-leadership model with clear accountability across KCC, TEP and partners.



Scope:
The Education Resources and Planning Unit supports Kent County Council's strategic education duties, focusing on academy conversion and oversight of commissioned provision. It ensures resources are planned and deployed so children and young people across Kent access suitable, high-quality provision, and manages the countywide education contract.

Does Disaggregation by default apply to this service? Yes

Why?

Education Resources and Planning can reasonably be treated as disaggregation by default. Demand is countywide and evenly spread, the budget is centrally managed without pooled geographic mechanisms, staffing is minimal with no specialist roles, and no specialist assets exist. Statutory duties transfer to successor bodies. Only the delivery model is Amber, not a barrier.

1.2.10 Education Resources and Planning

Covering: academisation of schools and TEP contract (Early Years, School Improvement, Skills and Employability, Specialist Employment, Schools Financial Services, and School Governance)

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

The main complexity sits within the delivery model, rated Amber because the service is in active transformation. This creates short-term uncertainty about where responsibilities will land during the lead-up to disaggregation. The function also sits alongside a countywide 10-year contract with The Education People (TEP), expiring 31 August 2028 and together with an SLA with HR Connect supporting academy conversion. Coordination dependencies with Property and Infrastructure, Finance, Pensions, Insurance and multiple TEP-delivered services (Schools Financial Services, School Improvement, Governor Services and central billing) add further contractual and coordination complexity, although the assessment does not identify operationally integrated structures that would prevent separation.

What are the potential risks of disaggregation that need to be considered?

The assessment does not identify material risks arising from disaggregation itself. The TEP contract's countywide scope, remaining term to August 2028 mean that any disaggregation will need to address how the contract is apportioned, novated or otherwise managed across successor authorities. Beyond these transition points, no further material risks are evidenced in the assessment.

Interdependencies

- Property, Finance, Pensions and Insurance functions for coordination.
- Assistant Directors of Education coordinate the function area-by-area.
- TEP: countywide 10-year contract to 2028) underpinning duties.
- HR Connect SLA and Diocesan Boards/DfE for academy conversion.

Next Steps/ Actions

Now

Map dependencies with Area Education and TEP-related service change activity.

Next

Confirm how the countywide TEP contract is apportioned, novated or managed.

Future

Sustain statutory academy conversion duty and cross-boundary governance with Diocesan Boards and DfE.



Scope:
Kent Educational Psychology Service (KEPS) supports the learning, development, emotional wellbeing and life outcomes of children and young people aged 0–25 across Kent, focusing on those who are vulnerable or have special educational needs and disabilities. It combines statutory EHC needs assessment advice with consultation, training and preventative work.

Does Disaggregation by default apply to this service? Yes

Why?

No strong evidence prevents disaggregating the whole service: assets are portable, no law prescribes geography, and delivery is already hybrid. However, Red-rated demand and staffing and an Amber budget — a 38% vacancy rate, heavy locum reliance and overspend — mean transitional arrangements are needed to protect statutory EHC capacity pending SEND-reform redesign.

1.2.11 Educational Psychology

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? The dominant complexity sits in demand and staffing, both rated Red. EHC assessment demand is uneven across the county, with the East consistently generating higher volumes (869 assessments compared with 581 in the North between May 2025 and April 2026), and cohorts presenting with co-occurring, complex needs including autism, SEMH, safeguarding vulnerability and trauma. Workforce is highly specialised and professionally regulated, requiring HCPC-registered educational psychologists, and evidences a 38% main-grade vacancy rate, a national shortage and a 20% reduction in Southeast regional training capacity. Delivery model complexity (Amber) reflects reliance on a bank of locum EPs delivering 64% of statutory advice, centrally coordinated support functions and flexible countywide deployment to meet statutory timescales. Budget complexity (Amber) is closely linked to this, with locum spend significant due to concentrated and high demand. Legislative complexity (Amber) reflects the statutory EHC assessment duty alongside forthcoming reform under the Schools White Paper (e.g. "Experts at Hand") and Education for All Bill, which will require significant transformation. What are the potential risks of disaggregation that need to be considered? The key risks relate to the potential loss of economies of scale, shared expertise, and central infrastructure, which could reduce efficiency and operational capacity at a time when workforce resources are already stretched. Splitting a small, regulated and scarce workforce risks workforce destabilisation and loss of experienced EPs, with heightened recruitment challenges in a market where locum rates and private practice already compete for supply. Increased financial constraints are evidenced as a likely consequence given the existing overspend and locum dependency, with a risk that successor bodies narrow the EP role to statutory duties only and shift towards a more reactive, EHCP-driven model that runs counter to national policy direction. Statutory continuity is a material consequence: with 64% of statutory advice currently delivered by locums, multiple successor unitaries competing for the same pool could compound existing capacity pressures. There is also a consequence for preventative and community-of-schools work, which sits outside statutory duties and could be squeezed if financial pressures increase post-disaggregation.

Interdependencies
- SEND assessment and EHCP casework drive statutory EP advice volumes. - Central business support and QA underpin locum and countywide deployment. - Locum EP supply via Connect2Kent delivers 64% of statutory advice. - National EP training pipeline and HCPC regulation constrain workforce rebuild.
Next Steps/ Actions
Now Map locum contracts for novation and model EHC assessment capacity against demand. Next Confirm minimum viable workforce, transitional countywide capacity and statutory-versus-discretionary activity split. Future Redesign the operating model alongside SEND reform, retaining specialist EP expertise collaboratively.

Scope:
Elective Home Education is a statutory KCC function that identifies children of compulsory school age not receiving suitable education and maintains contact with families who choose to home educate. It sits within Access to Education alongside Children Missing Education and In-Year Admissions, enabling shared identification, tracking and safeguarding engagement with families, schools and partner agencies. Delivery is in-house and countywide.

Does Disaggregation by default apply to this service? Yes

Why

No strong reason against disaggregation by default, however there are operational and safeguarding dependencies that will need to be carefully managed. Key risks include shared staffing arrangements, integrated data processes, inheritance of uneven demand and concentrated caseloads in some areas, and new statutory duties. While disaggregation could increase complexity and transition risk, these issues are considered manageable through service design, integrated local teams, and demand-based resource allocation.

1.2.12 Elective Home Education

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is driven primarily by the demand profile, the service delivery model, the staffing cohort and the legislative basis of the service. Demand is increasing year on year and is unevenly distributed across the county. Swale, Thanet, Ashford and Maidstone experience disproportionately high levels of demand and vulnerability, often reflecting greater safeguarding, deprivation and inclusion pressures that contribute to more complex case profiles. The delivery and staffing model relies on a centrally employed, countywide workforce flexed across functions (Elective Home Education, Children Missing Education and In-Year Admissions), with only four Senior Access to Education Officers operating as a shared resource, which limits modularity and means reconfiguration must preserve some form of cross-service cover. Legislatively, the Children's Wellbeing and Schools Act 2026 introduces mandatory pre-withdrawal meetings, consent determinations and a 15-day consideration window that will increase front-end activity and statutory time pressure, which is likely to be harder to absorb at smaller scale.

What are the potential risks of disaggregation that need to be considered?
The uneven distribution of high-volume, high-vulnerability demand is a principal risk, with Swale, Thanet, Ashford and Maidstone accounting for a disproportionate share of activity and complexity. This could result in successor authorities inheriting materially different levels of demand, creating capacity and service delivery pressures in some areas. The assessment highlights the need to replicate infrastructure, Designated Safeguarding Lead networks and coordinator roles across multiple authorities, together with the potential loss of flexibility to deploy staff and resources across geographical boundaries and service functions. It also notes a risk that the fragmentation of the current countywide operating model could lead to variation in safeguarding practice and decision-making, particularly in the context of expanded statutory responsibilities. At the same time, the assessment identifies potential opportunities arising from disaggregation, including stronger local partnerships and closer alignment with local social care teams, early help teams, and schools.

Interdependencies

- Integrated with Children Missing Education and In-Year Admissions.
- MIU (data support), KPAS (school roll deletions), ICS (safeguarding & Child Protection processes), and SEN (support for children with EHCPs).
- System dependency on Synergy and Liberi.
- Multi-agency safeguarding partners, including Police (Operation Encompass).
- Cross-boundary liaison with other local authorities when children move across boundaries.

Next Steps/ Actions

Now
Map staff transfer and post duplication across new authorities; plan shared safeguarding-record migration and access.

Next
Decide whether successor authorities formally integrate the three functions (Elective Home Education, Children Missing Education and In-Year Admissions) as part of a single service.

Future
Assess capacity requirements for new statutory duties (15-day consideration windows and mandatory pre-withdrawal meetings).

Scope:
The High Needs and Funding Monitoring Officers (HNFMO) service administers, allocates and monitors high needs funding for children and young people with SEND in educational settings. Four in-house officers, one aligned to each of Kent's four areas (North, East, South and West) cost EHCPs for mainstream schools, process Exceptional Pupil Need funding, support SEND tribunals and analyse school expenditure.

Does Disaggregation by default apply to this service? Yes

Why?

There are no substantive barriers to disaggregating the service. Funding flows through the Dedicated Schools Grant / High Needs Block, no specialist buildings or equipment are used, and only the Synergy system would need to be replicated or relicensed. While operational challenges exist, including limited workforce capacity, potential single points of failure risks, and cross-boundary coordination requirements, these are considered manageable through effective recruitment and collaborative working across successor authorities.

1.2.13 High Needs Funding and Monitoring officers (part of SEN Support and Inclusion)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Demand is unevenly distributed across Kent, with higher EHCP volumes and workload in East/North Kent (particularly Swale), although this reflects case volume rather than complexity of need. This would require resources to be allocated proportionately to demand to ensure capacity is aligned with workload. The delivery model is deliberately aligned to the geography of the SEND assessment and EHCP casework teams and relies on informal cross-area cover between officers to absorb workload peaks and absence, so any split will need to be planned alongside the wider SEND system. Staffing is a small, specialist team of four officers, each holding area responsibility and combining SEND legislative knowledge with financial expertise, which concentrates specialist knowledge in a limited number of individuals. Depending on the number of new authorities created, additional recruitment may be required to preserve coverage of one-officer-per-area.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies three principal risks. Firstly, depending on the number of new unitary authorities created, additional HNFMOs may need to be recruited. Secondly, a model with a single HNFMO in each authority could increase single point of failure risks. The current centrally resourced model provides greater resilience through flexible cross-area cover; as a result, resilience may be reduced following disaggregation unless formal cross-authority arrangements are put in place. Thirdly, close collaboration between successor authorities will be required because children routinely move across the county to access schooling. The assessment also flags a potential opportunity to align Area Moderation Boards with Schools Funding Forums as part of a future operating model, although further work would need to be undertaken to assess feasibility.

Interdependencies

- Aligned to SEND assessment and EHCP casework teams.
- KCC finance function distributes HNF to schools.
- Service provides financial evidence for SEND tribunal cases.
- Synergy system requires replication or relicensing.
- Communities of Schools (currently aligned to NHS Primary Care Networks) and planned Area Moderation Boards may require geographic realignment.
- Schools Funding Forums must be consulted on HNF arrangements.

Next Steps/ Actions

Now
Map cross-boundary pupil movement and confirm minimum staffing model per successor authority.

Next
Confirm Synergy licensing requirements and recruit additional posts. Establish whether cross-authority working arrangements are needed.

Future
Preserve geographic alignment with SEND assessment and EHCP casework teams.
Explore possibility of aligning Area Moderation Boards with Schools Funding Forums.

Scope:
KCC's Mainstream Home to School Transport service is a statutory service ensuring eligible children of compulsory school age can travel safely to and from their nearest suitable mainstream school. It primarily supports pupils living beyond statutory walking distances, low-income families meeting extended rights criteria, and those whose routes to school are unsafe.

Does Disaggregation by default apply to this service? Yes

Why?
Disaggregation is recommended to ensure alignment, accountability and operational effectiveness. Eligibility assessment (CYPE) and transport commissioning (GET Client Transport) currently sit apart, fragmenting end-to-end accountability. As successor authorities will set their own transport policies and eligibility criteria, local ownership is logical and strengthens demand management, a key cost driver. No statutory, geographic or specialist-workforce barrier exists. Merging both functions (CYPE Eligibility and GET Client Transport) ahead of Vesting Day is strongly recommended.

1.2.14 Mainstream Home to School Transport

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview	Interdependencies
What makes this service complex to disaggregate? Complexity is primarily associated with three assessment areas rated Amber: Demand, Delivery Model and Budget. Demand is distributed across a large and geographically dispersed cohort , with the service also supporting a cohort of pupils with specific medical needs that require tailored delivery arrangements. Delivery is currently provided through a countywide in-house model operating under a Memorandum of Understanding with GET Client Transport. Under this arrangement, the service is responsible for determining eligibility, while GET Client Transport manages the transport contracts and commissions provision, meaning that a significant element of operational and contractual complexity sits outside the service itself. Further complexity arises from cross-boundary travel patterns (approximately one-fifth of mainstream placements cross existing district boundaries), which is likely to become more significant under a multi-unitary structure, where increased boundary interfaces could affect operational coordination. Financial complexity is also evident, as staffing expenditure is not currently disaggregated between SEN and mainstream transport functions, potentially complicating the apportionment of costs between successor authorities. What are the potential risks of disaggregation that need to be considered? The assessment identifies the loss of economies of scale as the principal consequence of disaggregation. The current countywide model benefits from significant purchasing power and route optimisation efficiencies, both of which contribute to controlling costs and maximising value for money. The assessment also highlights the risk that increased competition between neighbouring authorities for transport provision could place upward pressure on prices within an already constrained transport market. In addition, disaggregation could lead to greater fragmentation in commissioning and service delivery approaches, creating potential inefficiencies and inconsistencies across areas. While these risks are considered manageable, their mitigation would require the proactive development of collaborative arrangements, including shared commissioning models, coordinated engagement with providers, cross-boundary commissioning mechanisms and effective price management strategies.	• GET Client Transport commissions provision under MOU. • Shared staffing budget with SEN Home to School Transport. • Routewise Transport system and GET route-planning software. • Service relies on external transport operator market. • Service operates within Education Act 1996 statutory framework.
Next Steps/ Actions	
Now Quantify Mainstream-specific budget, contract volumes and staffing, and clarify Routewise ownership and licensing. Next Agree cross-boundary commissioning model and merge eligibility and GET functions before Vesting Day. Future Sustain scale through shared or aligned procurement frameworks preserving buying power and market stability.	

Scope:
In-Year Admissions is a statutory KCC education function within CYPE managing applications for school places outside the normal admissions round. It handles In-Year Admission Forms for children moving into Kent or changing schools mid-year, delivers the Fair Access Protocol for vulnerable pupils, and informs parents of school place availability. The service operates countywide alongside Children Missing Education and Elective Home Education as part of the Fair Access to Education model.

Does Disaggregation by default apply to this service? Yes

Why?

No strong reason against disaggregation by default. The School Admissions Code prescribes no geographic footprint, the DSG-funded budget varies little by area, systems are standard and staffing largely generalist. However, roles, budgets and management are pooled with Children Missing Education and Elective Home Education, so an integrated successor model is advised to preserve cross-service coverage.

1.2.15 In-year admissions

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is driven by demand and the delivery/staffing model. Demand is countywide but uneven, with hotspots in Maidstone, Dartford and Swale, as well as a high number of applications received from out-of-Kent addresses, indicating heavy reliance on cross-boundary information flows. The delivery model is intentionally designed to pool administrative staff and Senior Access to Education Officers across In-Year Admissions, Children Missing Education and Elective Home Education, using In-Year Admissions as a front door to identifying children missing school. Staffing complexity is amplified by the fact that only four Senior Access to Education Officers currently hold countywide responsibility for delivering the Fair Access Protocol, while several roles are shared across the three functions. Disaggregation would therefore reduce the flexibility provided by the existing model and may limit the ability to deploy resources across service areas unless alternative arrangements are established within successor authorities.
What are the potential risks of disaggregation that need to be considered? The service receives a significant number of out-of-county applications, which relies on timely information flows across boundaries. There may therefore be implications for continuity and data handling if delivery arrangements change, especially if multiple new unitary authorities are created. Disproportionate pressure could be placed on specific areas such as Dartford and Maidstone who already frequently handle multiple cross-border applicants and out-of-county movers. Loss of pooled administrative flexibility and cross-subsidy is also highlighted as a material consequence, as the Access to Education model deliberately uses shared staff and processes to monitor children not in school. Financial decoupling would be required to preserve Children Missing Education and Fair Access Protocol capacity currently funded through the In-Year Admissions budget. Additional management overhead would be needed to replicate the single countywide coordinator role locally, and duplication of Senior Access to Education Officer posts may be required to sustain statutory Fair Access Protocol delivery across multiple new authorities.

Interdependencies
- Integrated with Children Missing Education and Elective Home Education. - Coordinated Admissions provide school place availability; service also uses National Pupil Database - KPAS refers excluded pupils into the Fair Access Protocol. - Service uses Synergy and Liberi casework systems; works with MIU for data support and collection. - Externally, the service works with schools, academies and Fair Access Protocol district panels.
Next Steps/ Actions
Now Map split-role staffing capacity and clarify Fair Access Protocol continuity across future authority footprints. Next Model DSG apportionment and agree interim governance for cross-boundary in-year applications. Future Decide whether successor authorities formally integrate the three functions (In-Year Admissions, Children Missing Education and Elective Home Education) as part of a single service. Decide whether successor authorities will move to fully coordinated in-year admissions models.



Scope:
KM CAT provides specialist Augmentative and Alternative Communication (AAC) and Assistive Technology assessment, equipment, training and follow-on support for children and young people aged 0–19 across Kent and Medway. It is one of 15 national NHS England specialised AAC services and also delivers locally commissioned support.

Does Disaggregation by default apply to this service? Part 13
Why?

KM CAT should remain countywide because its NHSE-commissioned specialised AAC service, specialist workforce, Ashford assessment centre and pooled equipment cannot be efficiently replicated. Disaggregation would weaken clinical capacity and commissioning relationships. A sequenced countywide transition is the strongest evidenced recommendation.

1.2.16 Kent and Medway Communication and Assistive Technology (KM CAT) Service

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (R)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? The service is delivered as a fully countywide, trans-disciplinary team with no locality structure, and specialist staff are flexibly deployed across all Kent and Medway districts to match scarce capacity to individual need. Staffing complexity is intensified by the fact that the workforce is small, highly specialised and professionally regulated, with three healthcare-scientist posts delivered via an EKHUFT sub-contract that is essential for medical device regulatory compliance. Assets and systems complexity centres on a single multi-purpose Ashford building that serves as an assessment centre, training venue and equipment store, off-site NHS workshop capacity at Kent and Canterbury Hospital, and 2,500+ pooled specialist items managed through several specialist digital systems currently under review for migration to Rio, e-Quip and SharePoint. Legislatively, the service's geographic footprint is set by NHSE specialised commissioning, and safeguarding duties require the full specialist capability to be retained. What are the potential risks of disaggregation that need to be considered? Disaggregation could be both costly and operationally challenging, given the small workforce, extensive geographic coverage, and reliance on a central facility for assessments, training, and specialist equipment storage. Fragmenting the workforce risks losing the EKHUFT-hosted clinical technologist capacity that underpins medical device regulatory compliance, which cannot be readily replicated across multiple unitary authorities. Splitting the pooled equipment inventory and duplicating the specialist assessment base would erode economies of scale in procurement and maintenance, and destabilise a budget already pooled across four commissioners with the main KCC element drawn from the High Needs Block. Disaggregation would also cut across NHSE specialised commissioning arrangements, requiring agreement with (and accommodation within) NHSE and ICB commissioning, at a time when NHSE is due to disband and SEN reform is in progress. Existing fragility — a current teacher vacancy and reduced admin capacity — would be compounded by any structural change during the transition window.

Interdependencies
- Education settings, STLS and SEN officers refer and embed advice. - KCC-owned Ashford assessment base. - High Needs Block funding. - NHSE specialised commissioning, Kent and Medway ICB, KCHFT, EKHUFT sub-contract. - Partner clinical services and specialist systems migrating to Rio, e-Quip.
Next Steps/ Actions
Now Map tri-employer workforce, plan digital-systems migration and confirm Ashford centre continuity. Next Confirm countywide NHSE footprint, pooled-funding apportionment and minimum viable clinical technologist scale. Future Sustain specialist workforce, procurement economies and cross-boundary governance, sequenced with NHSE disbandment.

Scope:
The Kent Pupil Referral Units and Attendance Service (KPAS) is a statutory countywide education service that aims to reduce persistent and severe absence, suspension and permanent exclusion across Kent. It supports secondary-aged pupils who often have complex needs, including SEND-related requirements and long-term alternative provision placements.

Does Disaggregation by default apply to this service? Yes

Why

No strong reason prevents disaggregation, with some elements of the service already structured for separation (e.g. area-based KPAS officer teams). PRU provision will be more complex to disaggregate given budgets are underpinned by external SLAs to 2030 but feasible if contracts are retained through transition. Disaggregation of the Health Needs Coordinator role, the Child Employment and Entertainment Team, and the Courts function are achievable with added capacity, workforce planning and sustainable funding.

1.2.17 Kent Pupil Referral Units (PRU) and Attendance Service (KPAS)

Complexity Driver RAG Assessment		
Demand (A) 	Delivery Model (R) 	Staffing (A) 
Budget (A) 	Assets/ Systems (A) 	Legislative (A) 

Complexity Overview

What makes this service complex to disaggregate?
Complexity arises through the current delivery model, rated Red because the service comprises five distinct elements - area-based KPAS teams, PRUs delivered by external providers and schools, a single countywide Health Needs Coordinator, a small specialist Child Employment and Entertainment Team, and a pooled countywide Courts Team, with some elements more straightforward to disaggregate than others. While budgets could be divided, doing so would be complex, given that most expenditure is committed through long-term SLAs with schools and external providers. Workforce challenges include specialist prosecutor roles requiring extensive training and authorisation, alongside a single statutory Health Needs Coordinator post funded through variable income. Demand is uneven across the county, with higher and more complex caseloads in North and Mid Kent. Additional complexity arises from the Digital Front Door system, which supports multiple statutory processes, and from expected legislative changes that will increase statutory responsibilities for successor authorities.

What are the potential risks of disaggregation that need to be considered?
Dividing the pooled capacity of the Courts Team presents implementation risks, as KCC currently utilises its full allocation of 1,430 Single Justice Procedure cases annually and manages around 100 live magistrates’ hearings. Disaggregating this finite court capacity across successor authorities could reduce flexibility, create capacity constraints, and make it more difficult to align available court time with local demand. Disaggregating the PRU footprint carries cross-boundary implications given that provision spans districts and involves both third-party providers and school-managed arrangements under SLAs to 2030. The single countywide Health Needs Coordinator role presents a known funding gap that each new unitary will need to resolve. Disaggregation of the small Child Employment and Entertainment Team (4.54 FTE) could result in only a single specialist post being established within each successor authority. Where demand cannot be accommodated within existing resources, this may necessitate the recruitment of additional staff or the training and upskilling of personnel from other service areas to provide sufficient capacity and resilience.

Interdependencies

- PRU provision via providers and schools under SLAs to 2030.
- Digital Front Door underpins eleven statutory referral pathways.
- Courts Team depends on finite SJP court allocations.
- The Education Programme provides statutory sixth-day provision for secondary-aged pupils with EHCPs referred by KPAS following suspension or exclusion.
- The Children Missing Education team is notified by KPAS when pupils are deleted from the admissions register.

Next Steps/ Actions

Now
Recalculate PRU funding flows and review Digital Front Door hosting, licensing and data-sharing arrangements.

Next
Decide Courts capacity and SJP allocations, and plan Health Needs Coordinator recruitment.

Future
Confirm whether pooled arrangements continue for specialist functions (e.g. prosecution officers and licensing functions).

Scope:
The Phase Transfer and SEN Data Coordination teams jointly deliver KCC's statutory SEND phase transfer function for children and young people with EHCPs moving between key education phases. Phase Transfer leads consultation, placement decisions and casework, while SEN Data Coordination manages the digital application process, data collection and the issuing of offers. Both teams operate countywide and are delivered fully in-house as a single integrated process.

Does Disaggregation by default apply to this service? Yes

Why?
No fundamental barriers to disaggregation were identified. The current arrangements benefit from integrated working practices, flexible staff deployment, shared systems and a small workforce, all of which would create transition and implementation challenges following disaggregation. However, these challenges are considered manageable. Successor authorities could also consider combining existing teams into a single integrated service to maintain service resilience.

1.2.18 Phase Transfer and SEN Data Coordination

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is primarily linked to demand, the delivery model, and staffing arrangements, all of which have been assessed as Amber. Demand is not evenly distributed across the county, with East Kent experiencing the highest volumes of Secondary and Post-16 cases. Under the current countywide model, these variations are managed through the flexible deployment of resources across geographic areas. The delivery model is an integrated countywide process combining casework and data coordination, with the Phase Transfer team having recently moved from a locality-based to a countywide model to improve consistency and statutory compliance. Staffing depends on a small, generalist SEN Data Coordination team of 5 FTE where officers are required to undertake multiple tasks/roles to maintain service resilience, while Post-16 Phase Transfer roles are flagged as high risk due to turnover and scarcity of experienced staff. Together, these factors mean disaggregation is achievable but would require careful attention to workforce resilience.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies risks including loss of efficiency and consistency from countywide centralisation, duplication of roles across successor authorities, and workforce shortages (particularly in Post-16 roles). There is a stated risk of system and data-sharing fragmentation and weakened coordination with linked services such as Fair Access and admissions. Increased cross-border placement activity may also generate disputes over placement and funding responsibility across new authorities.

Interdependencies

- Interdependency between the Phase Transfer and SEN Data Coordination teams, which operate as a single integrated process.
- Interdependencies with health and social care.
- Service works with Fair Access and Coordinated Admissions - shared data, processes and statutory timetables.
- Reliance on Synergy and Core Plus casework systems.
- Out-of-county consultations with Medway and London boroughs to secure placements.
- All placements are legal/contractual arrangements.

Next Steps/ Actions

Now
Assess workforce risks and mitigations for Post-16 Phase Transfer and SEN Data Coordination roles.

Next
Decide governance model for cross-boundary placements. Confirm Synergy licensing and data continuity.

Future
Decide whether both teams are formally integrated into a single service (service design choice for successor authorities).

Scope:
SEND Business Support is an in-house, countywide CYPE function providing administrative and operational support to SEND teams. Activities include EHC assessment processing, tribunal administration, annual reviews, quality assurance, EHCP transfers and statutory timescale monitoring.

Does Disaggregation by default apply to this service? Yes

Why?

The service can reasonably be disaggregated, with no significant legal, workforce or operational barriers. It is delivered wholly in-house, with no specialist or regulated roles, no specialist equipment and no external contracts. The Synergy Database represents the most significant transitional dependency, holding countywide statutory SEND data that would require phased migration and careful coordination during separation, though this is regarded as an implementation issue rather than a barrier to disaggregation.

1.2.19 SEND Business Support

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in Assets and Systems, rated Amber. The service depends on the Synergy Database (SEND module) as the countywide statutory case management system for EHCPs and statutory tracking, and on Liberi for cross-referencing where children have social care involvement. Multiple licences would be required under disaggregation, and both systems hold statutory case data that cannot simply be duplicated, so migration would carry risk to data integrity and statutory tracking. A detailed cost assessment with ICT has not yet been undertaken. Delivery is designed for countywide scale and depends on flexible deployment of multi-skilled staff across workstreams, which could be harder to sustain in smaller successor teams.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies several risks. Splitting the workforce would erode the resilience currently provided by flexible deployment of multi-skilled staff across workstreams. Duplicating coordination and management across successor authorities would likely increase overall cost. Fragmenting or replacing the Synergy Database without careful sequencing would put data integrity and statutory tracking at risk. Distributing staff across smaller teams could dilute the SEND-specific operational knowledge that takes time to build and is critical to statutory performance during transition.

Interdependencies

- SEND operational teams rely on the Business Support function.
- Synergy Database (SEND module) underpins countywide statutory EHCP tracking.
- Liberi database used to identify children who have social care involvement.
- Other local authorities for EHCP transfers in and out of the county; NHS for health input into EHCPs.

Next Steps/ Actions

Now

Confirm sequencing and licensing decisions for Synergy and Liberi.

Next

Determine the most effective operating model for SEND support.

Future

Manage anticipated national SEND reform impacts.

Scope:
The SEND Finance function is responsible for managing the financial resources that support services for children and young people with SEND. Its core activities include budgeting, financial planning, expenditure monitoring, funding allocation, financial reporting, and ensuring compliance with financial regulations and statutory requirements. The function is delivered on a countywide, in-house basis, organised around central budget management rather than geographical delivery

Does Disaggregation by default apply to this service? Yes

Why?

Viewed in isolation, the function appears relatively straightforward to disaggregate. It is administrative in nature, delivered in-house, and does not rely on any highly specialist or professionally regulated roles. However, its role in managing SEND funding and providing financial analysis across the wider SEND system creates operational interdependencies. Future operating model design will therefore need to ensure continued alignment between SEND Finance and broader SEND service delivery functions.

1.2.20 SEND Finance

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Although the function is broadly capable of disaggregation, a number of operational and system-wide factors increase implementation complexity. SEND Finance operates within a specialised SEND environment and manages countywide budgets where expenditure patterns are influenced by variations in local demand, including differences in EHCP prevalence and SEN provision. The current operating model is structured around countywide budget management rather than geographic delivery, creating challenges in allocating funding responsibilities across successor authorities. Complexity is further increased by pupil movement across Kent, historical transfers of funding between areas, and a range of operational interdependencies with commissioning, Schools Finance, joint arrangements with Medway, and NHS-linked supplier contracts, all of which would require reconfiguration under new unitary structures. Transformation activity may also be required as a result of upcoming SEND Reforms.

What are the potential risks of disaggregation that need to be considered?

Disaggregation would primarily introduce operational and financial management risks associated with moving away from the current countywide model. The principal consequence identified by the assessment is the need to replicate functions currently delivered centrally, which could potentially increase costs and reduce operational efficiency. The loss of a single countywide budgeting framework could also reduce flexibility in managing demand and expenditure pressures across the SEND system, particularly where EHCP prevalence, placement costs and service demand vary geographically. Additional complexity may arise from pupil movement across new authority boundaries, creating challenges for cost allocation, forecasting and funding arrangements. There is also a risk that existing relationships and processes involving Children's Commissioning, Schools Finance, NHS-linked suppliers and joint arrangements with Medway would need to be replicated or reconfigured across successor authorities, increasing transition risk and administrative burden.

Interdependencies

- The function is embedded within the wider SEND operating model.
- Direct dependency on the Children's Commissioning Team for supplier contract information. Supplier arrangements include contracts with the NHS.
- Tuition framework is managed jointly with Medway through Children's Commissioning.
- KCC Schools Finance function assists with complex funding matters.

Next Steps/ Actions

Now

Confirm how Dedicated Schools Grant (DSG) funding would be apportioned under any future structure.

Next

Determine how funding flows linked to pupil movement would be managed in a multi-unitary structure.

Future

Embed SEND Finance within wider SEND operational and commissioning functions across successor authorities.



Scope:
SEND Home to School Transport is a statutory service enabling children and young people with special educational needs and/or disabilities to access education safely, including settings named in an EHC Plan. It assesses eligibility and arranges dedicated vehicles, chaperones, personal transport budgets or travel training. Delivery is in-house and countywide.

Does Disaggregation by default apply to this service? Yes

Why?
Disaggregation is recommended to ensure alignment, accountability and operational effectiveness. Eligibility assessment (CYPE) and transport commissioning (GET Client Transport) currently sit apart, fragmenting end-to-end accountability. As successor authorities will set their own transport policies and eligibility criteria, local ownership is logical and strengthens demand management, a key cost driver. No statutory, geographic or specialist-workforce barrier exists. Merging both functions (CYPE Eligibility and GET Client Transport) ahead of Vesting Day is strongly recommended.

1.2.21 SEND Home to School Transport

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (G)	●
Budget (R)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Demand complexity reflects the scale and dispersion of the cohort combined with the inherently individualised, case-by-case nature of SEND eligibility assessments. Delivery complexity stems from the in-house model which splits eligibility assessment in CYPE and commissioning in GET Client Transport under a Memorandum of Understanding, and the fact that nearly half of SEN placements cross current district boundaries, meaning smaller unitary geographies risk inheriting resident demand without matching local specialist provision. Budget complexity arises from a significant non-staffing spend held on a countywide basis with no area-based allocation, set against structural cost pressures from rising demand, contract inflation and pupil-number growth, alongside MTFP savings requirements targeting route optimisation. Staffing, Assets/Systems and Legislative drivers are Green, though the Routewise Transport database shared with GET Client Transport represents a clear system dependency that will need to be resolved.

What are the potential risks of disaggregation that need to be considered?
Consequences relate to scale, market position and appeals capacity. Loss of countywide economies of scale would reduce the ability to optimise routes and share vehicles, increasing per-pupil costs. Smaller successor authorities would have weaker purchasing power in an already constrained transport market and increased intra-authority competition could drive up operator prices. Existing SEND transport cost pressures, already significant and growing for KCC, would be inherited by successor bodies with lower financial resilience and less capacity to absorb overspends. Cross-boundary SEN placement patterns mean disaggregation would create day-one reliance on neighbouring authorities for specialist provision, requiring deliberate cross-boundary commissioning from the outset. Statutory appeals hierarchies would need to be replicated across each successor authority, implying duplication of senior decision-making capacity.

Interdependencies

- SEN services supply placement and pupil-need information for eligibility assessments.
- GET Client Transport commissions provision via c.2,000 transport contracts.
- Routewise transport database supports transport planning and delivery.
- Transport operator market underpins service delivery and is exposed to inflationary pressures.
- The Education White Paper may affect future demand levels.

Next Steps/ Actions

Now
Clarify Routewise ownership and licensing.
Map cross-boundary SEN placement flows against specialist provision by geography.

Next
Agree cross-boundary commissioning model and merge eligibility and GET functions before Vesting Day.

Future
Sustain scale through shared or aligned procurement frameworks preserving buying power and market stability.

Scope:
The Quality Assurance and SEND Strategic Development service provides countywide assurance, improvement and strategic development across Kent's SEND system. It delivers quality assurance, practice development, SEND engagement, workforce and culture framework implementation, and strategic planning, including the SEND Strategy and Co-Production Charter. Delivery is primarily in-house, with around 75 FTE.

Does Disaggregation by default apply to this service? Yes

Why?

There is no strong evidence preventing disaggregation. The countywide function supports statutory SEND duties and relies on specialist expertise, but the evidence points to complexity, replication and transitional considerations rather than hard legal, financial or operational constraints.

1.2.22 SEND Quality Assurance & SEND Strategic Development

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is driven primarily by the countywide, systemwide nature of the service and its close alignment with SEND operational delivery. Demand is uneven and reactive to SEND system performance, inspection findings, complaints and improvement priorities rather than being geographically discrete, meaning it cannot be cleanly segmented between successor authorities. The delivery model is centralised, with resource flexed against risk and improvement priorities, and depends on interdependencies with SEND operational services, education, children's social care. There are a number of specific interdependencies with internal teams as well including commissioning, performance and policy. Staffing complexity arises from reliance on specialist SEND capability, including quality assurance, practice development, co-production, strategic development and DSCO-qualified social care officers. The service noted that replication across multiple unitary councils may be challenging. Legislative complexity reflects the service's role in underpinning statutory SEND duties and the SEND Code of Practice, even though legislation does not require countywide delivery of this specific function.

What are the potential risks of disaggregation that need to be considered?
The loss of countywide consistency, **duplication** of specialist roles, reduced resilience, fragmented SEND quality assurance and weakened strategic oversight are the principal consequences of disaggregation. Inconsistent co-production and engagement practice and additional pressure on a limited specialist workforce are also flagged, alongside the risk that smaller successor authorities may find it harder to sustain the same breadth of SEND assurance, strategic development, workforce culture and partnership capacity. Because demand is generated by SEND operational performance and statutory requirements, any reconfiguration of SEND services would generate parallel demand for assurance, engagement and strategic development activity in each successor authority, with corresponding staffing and budget replication consequences. These are transitional and design consequences rather than hard barriers, but they are material to how the future model is scoped and resourced.

Interdependencies

- Interdependent with SEND operational services, education and social care.
- Commissioning, performance, complaints, inclusion, schools and workforce development functions.
- Financially integrated with wider SEND budgets, not standalone funding.
- Partnership working across education, health, care, schools, settings and families.

Next Steps/ Actions

Now
Map interdependencies, confirm budgets and MTFP, and cross-check contracts and shared systems.

Next
Confirm minimum specialist assurance capacity and function ownership per successor authority.

Future
Sustain consistent SEND assurance, co-production and specialist roles across successor authorities.

Scope:
The SEN Support and Inclusion Advisers service provides specialist advice, quality assurance, monitoring and intervention across mainstream schools, independent and non-maintained special schools, and post-16/19 specialist providers. It supports statutory duties under EHCP Section F and Section 19 alternative provision. The service comprises two elements: Mainstream SEN Inclusion Advisers (12.6 FTE), and Independent and Non-Maintained Special Schools & Post 16/19 SEN Inclusion Advisers (2 FTE).

Does Disaggregation by default apply to this service? Yes

Why?
The assessment concludes that the service can be disaggregated, provided specialist functions are supported through transitional arrangements. While the mainstream element is more readily disaggregable due to its larger workforce, specialist Independent and Non-Maintained Special Schools and Post-16/19 functions currently rely on only two officers. A phased approach, supported by recruitment, workforce development and temporary shared-service arrangements, is therefore recommended to ensure continuity and resilience while sufficient specialist capacity is established across successor authorities.

1.2.23 SEN Support and Inclusion Advisers for Mainstream Schools and Independent and Non-Maintained Special Schools and Post-16/19 providers (part of SEN Support and Inclusion)

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

The service would be complex to disaggregate due to its specialised countywide operating model and reliance on a small number of specialist staff. Delivery is based on the flexible deployment of SEN Inclusion Advisers across Kent to respond to fluctuating demand and out-of-county placements, many determined by the location of specialist provision rather than local geography. This flexibility is important in supporting statutory functions, including Section 19 alternative provision assessments and oversight of EHCP Section F provision. Demand is also unevenly distributed, with higher activity in East Kent, meaning any disaggregated model would need to apportion resources to reflect differing demand profiles. Workforce considerations add further complexity, as the service relies on a small number of highly specialised and professionally regulated officers, including single postholders responsible for independent and non-maintained special schools and post-16/19 oversight. Replicating this expertise across multiple successor authorities would create recruitment, training and resilience challenges, requiring workforce development and potentially new posts to avoid single points of failure risks.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies loss of countywide flexibility and shared specialist knowledge as a primary risk, alongside capacity risk in monitoring independent and non-maintained special schools and post-16/19 settings, where each function is delivered by a single officer. Splitting these roles across multiple new unitary authorities would require either major recruitment activity or significant upskilling of mainstream school SEN Inclusion Advisers. Cross-boundary placement patterns, with substantial volumes of children placed outside Kent, notably in East Sussex and Medway, would need coordination between successor authorities. The service also has important links to the Council's Safety Valve programme, and so further analysis would need to be undertaken to determine whether existing savings commitments could be maintained within a disaggregated structure.

Interdependencies

- Service undertakes Section 19 assessments with KPAS and supports EHCP Section F delivery across SEND services.
- Plans are underway to increase specialist officer capacity, with staff from the Specialist Teaching and Language Service being trained to undertake supervised visits of independent and non-maintained special schools.
- Service shares information with other LAs using same independent school providers for out-of-county placements.

Next Steps/ Actions

Now

Confirm outcome of current recruitment exercise and quantify resulting specialist workforce capacity. Formalise supervised expansion arrangement with the Specialist Teaching and Language Service.

Next

Map cross-boundary placements. Clarify Safety Valve commitments and their implications for financial disaggregation.

Future

Maintain transitional shared arrangements for specialist functions (independent and non-maintained special schools and post-16/19 oversight) while sufficient capacity is established across successor authorities.

Scope:
The SEN Therapies service comprises two interrelated elements: Balanced System Leads, who work with the NHS to support Speech, Language and Communication Needs in schools, and a specialist SEN Therapies team, which commissions provision outside the NHS contract. The service supports access to Occupational Therapy, Speech and Language Therapy and Physiotherapy specified in EHCPs (Section F requirements).

Does Disaggregation by default apply to this service? Yes

Why?
The assessment concludes that the service is capable of disaggregation; however, significant workforce, commissioning and operational challenges would need to be addressed to support successful implementation. Key risks include reliance on a small specialist Speech and Language Therapy workforce and the potential loss of commissioning leverage. A phased implementation approach, supported by shared specialist functions, aligned commissioning arrangements and strong NHS partnership working, is recommended to maintain service continuity and resilience during transition while successor authorities establish sustainable local operating models.

1.2.24 SEN Therapies (part of SEN Support and Inclusion)

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is driven by demand and staffing pressures, both rated Red. Demand varies geographically (with particularly high volumes in West Kent) and by therapy type. There are also outstanding cases across all areas of the county, indicating ongoing pressures in securing access to enhanced and non-standard therapy provision and highlighting challenges in meeting demand consistently across the service. Staffing complexity centres on a small team of seven, including highly specialised Speech and Language Therapy (SALT) roles that would likely need to be duplicated in each new authority against a backdrop of sector-wide shortages. Delivery Model and Budget (both Amber) add further complexity through outsourced therapy provision, reliance on framework and off-framework commissioning across a regional South-East and London provider footprint, and a potential risk of price increases if internal competition emerges between successor authorities. Legislative complexity (Amber) reflects the statutory duty to arrange Section F provision within EHCPs and the potential impact of upcoming SEND Reforms (e.g. 'Experts at Hands' model) on future demand and role definitions.

What are the potential risks of disaggregation that need to be considered?

The principal risk associated with disaggregation relates to the challenge of replicating specialist SALT capacity across successor authorities in the context of existing national workforce shortages. The assessment also identifies risks arising from the fragmentation of commissioning arrangements, including the potential for inconsistent commissioning practices, reduced collective purchasing power and variations in provider relationships, which could result in differences in both cost and quality of provision across areas. Further risks relate to the continuity of established NHS partnership arrangements, including the jointly funded Balanced System Lead SALT role and the NHS-contracted Balanced System programme, which is currently funded through to 2030. Disaggregation may also weaken the coherence of the existing centralised oversight model, which supports consistent assessment and interpretation of need within EHCPs.

Interdependencies

- Service is embedded within the wider SEND system and EHCP process.
- SEND commissioning team sources therapy provision via the Qualified Provider List.
- Synergy used for casework management.
- Service works closely with NHS partners (Integrated Care Board and Kent Community Health Foundation Trust) to deliver the Balanced System programme.

Next Steps/ Actions

Now

Map provider market capacity and specialist workforce requirements.

Next

Establish aligned provider frameworks across successor authorities to protect purchasing scale and market stability.

Future

Redesign the operating model alongside wider SEND reform, retaining specialist SALT expertise.

Scope:
The Specialist Learning and Teaching Service provides in-house training, advice, mentoring, coaching and guidance to Kent schools, supporting SENCOs and enabling mainstream and specialist settings to meet statutory SEND responsibilities, including EHCP provision. Delivered countywide, the service is non-statutory but underpins statutory SEND functions.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default, and the assessment identifies no structural, legislative or asset barriers to splitting it. Complexity is moderate: an unresolved demand baseline following formation from 12 legacy contracts, an evolving move to area-based delivery, and SEN reforms. These are transition considerations, not blockers.

1.2.25 Specialist Learning and Teaching Service

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Demand is rated Amber because the service was formed in September 2025 from 12 different commissioned contracts with varying delivery models, meaning a consistent baseline of need cannot yet be established and historic demand was shaped by available capacity rather than standardised measurement. Delivery Model is Amber due to a live transition from a district-based to an area-based structure and coordination requirements within the PRG multi-disciplinary arrangement and with the NHS Integrated Care Board. Staffing is Amber because all 68 FTE hold specialist postgraduate roles on Teachers' Terms and Conditions with widespread upper pay scale use and SEN allowances that sit outside standard KCC grading, and recruitment and retention have not yet been tested against the redesigned structure. Legislative basis is Amber because national SEN reforms and the proposed 'Experts at Hand' model introduce future uncertainty that may require significant service redesign ahead of anticipated 2028 legislation. Budget and Assets and Systems are Green, with no material implementation issues identified beyond planned countywide expansion of Thrive licences.

What are the potential risks of disaggregation that need to be considered?

Financial risk is highlighted through High Needs Block overspend, which could compress the service back to statutory-supporting functions only and reduce the preventative offer. Inherited geographical staffing inequities, notably fewer staff in North Kent, create a consequence that disaggregation could reproduce existing imbalances unless workforce redesign is completed alongside the split. Sequencing is a further consequence: aligning disaggregation with the national SEN reform timetable and the proposed 'Experts at Hand' model will influence how successor organisations shape the future workforce and delivery footprint, with transformation activity required.

Interdependencies

- Embedded within the PRG multi-disciplinary inclusion service supporting SEND functions.
- Funded solely through the High Needs Block.
- Operational interdependency with the NHS Integrated Care Board.
- Thrive system licences and national 'Experts at Hand' SEN reform.

Next Steps/ Actions

Now

Establish a consistent countywide demand baseline and map workforce contracts and grading.

Next

Confirm the end-state delivery model and High Needs Block funding split.

Future

Build specialist recruitment resilience and align with national 'Experts at Hand' SEN reforms, look at transformation activity required for the delivery of these reforms.

Scope:
The Specialist Teaching and Learning Service for Sensory and Physical Disabilities is a countywide statutory teaching and advisory service for children and young people aged birth to 19 (up to 25 in some cases) with hearing, vision and multisensory impairment, plus non-statutory support for physical disabilities and complex medical needs.

Page 123
Does Disaggregation by default apply to this service? Yes
Why?

The service can be disaggregated, subject to transition considerations. Demand, Delivery Model and Staffing are the biggest challenges: the team could split across unitaries only if critical mass for specialist practice is maintained. Scarce regulated staff and long training lead-in times mean transitional arrangements are needed; recommendation stays indicative pending SEND reform.

1.2.26 Specialist Teaching for Sensory and Physical Disabilities

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in Demand, Delivery Model and Staffing, all rated as the most challenging. Demand is countywide, transient and unpredictable across low-incidence, high-need cohorts, which requires bespoke specialist responses rather than uniform provision. The delivery model relies on a single countywide team with flexible cross-district deployment and highly specialist roles, including the educational audiologist, VI technology specialist and MSI interveners which cannot be split geographically due to scarcity and scale. Staffing complexity is heightened by professionally regulated roles requiring DfE-approved postgraduate qualifications with two-year training lead-in times and known national recruitment difficulties. Assets and Systems (Amber) and Legislative basis (Amber) add further implementation considerations through licensed specialist software, mobile high-cost equipment, and statutory duties under the SEN Code of Practice, the Children and Families Act 2014 and deafblind/MSI guidance, alongside potential transformation activity linked to upcoming SEND Reforms (e.g. 'Experts at Hand' model).

What are the potential risks of disaggregation that need to be considered?
The retention of highly specialised staff, loss of expertise, reduced ability to cover extended absence, and risk to meeting statutory duties within required timescales as the main risks. Disaggregation would risk inability to meet statutory duties due to recruitment and retention challenges, particularly for sensory and MSI provision – this will need to be protected throughout transition. It also states that duplication of specialist licences and equipment across multiple authorities would be expensive and problematic. A further consequence is the loss of the current cross-boundary flexibility that enables the service to absorb fluctuating demand and provide resilience for low-volume, high-complexity cases. These consequences underpin the position that, while disaggregation applies, it should be supported by transitional arrangements.

Interdependencies

- Countywide pooling of scarce specialist roles across districts.
- Shared specialist equipment, licensed software and central staffing budget.
- Commissioned habilitation (KAB) and SSOT occupational therapy contracts.
- Reciprocal working with Medway Sensory Service; statutory SEND framework.

Next Steps/ Actions

Now
Map the specialist workforce, qualifications and training pipeline against unitary footprints.

Next
Confirm how splitting into four unitaries impacts critical mass and equipment allocation.

Future
Preserve critical mass and cross-boundary flexibility, aligned to national SEND reform.

Scope:
The Education Programme is KCC's in-house tuition service, delivering interim, personalised 1:1 education to children and young people without a school placement. It discharges the local authority's statutory sixth-day duty for primary-aged exclusions under Section 19 of the Education Act 1996 and supports excluded secondary-aged pupils with an active EHCP.

Does Disaggregation by default apply to this service? Yes

Why?
The service can be disaggregated, with no complexity driver a prohibitive barrier. Key factors supporting this recommendation include a substantial workforce and a broadly consistent budget across the county. The main challenge relates to maintaining statutory service continuity, as the current model relies on flexible staff deployment to meet fluctuating demand and legal duties. To preserve resilience and compliance following disaggregation, successor authorities could establish cross-boundary agreements, such as SLAs or MoUs, enabling temporary staff sharing during periods of peak demand.

1.2.27 The Education Programme (in-house tuition)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Moderate complexity is present across all drivers except assets. Demand is both high and volatile, driven by increasing numbers of pupils with Social, Emotional and Mental Health (SEMH) needs, including Emotionally Based School Avoidance (EBSA), pupils experiencing placement instability, and those in SEND tribunal processes. This demand is not evenly distributed geographically, with parts of East and North Kent (Canterbury, Swale and Thanet) likely to inherit higher levels of need, requiring additional staffing and resources. The current countywide model enables flexible redeployment of staff to respond to fluctuations in demand and meet statutory timescales. Disaggregation would reduce this flexibility, potentially impacting service responsiveness and resilience. Further complexity arises from the workforce model, which depends on recruiting and retaining qualified teaching professionals, including senior staff with specialist SEND experience, and may require duplication of scarce expertise. While Dedicated Schools Grant (DSG) funding could be apportioned with relative ease, replicating the existing bespoke Service Level Agreement arrangements with the SEND service would present greater complexity and may require new funding and governance arrangements. Assets are largely digital, but continuity of Synergy case management, the attendance app and lone-worker devices remain operationally necessary.

What are the potential risks of disaggregation that need to be considered?
The principal risk identified is that disaggregation could fragment service delivery, resulting in reduced quality and consistency of provision. Loss of countywide scale and flexibility could compromise delivery of statutory 6th day provision, particularly in high-demand districts, and lead to extended periods without education. Additional challenges arise from the need to replicate senior leadership capacity with specialist SEND expertise, together with Qualified Teacher Status (QTS)-qualified tutor provision, across successor authorities. The existing internal Service Level Agreement funding arrangement with KCC SEND would not transfer automatically, requiring each unitary authority to establish and fund its own model for providing interim education to SEND pupils without a school placement. The assessment also identifies increased administrative requirements and greater cross-boundary coordination as risks, with implications for safeguarding oversight and service continuity.

Interdependencies

- Internal SLA with KCC SEND which funds interim tuition for pupils with an EHCP who are without a school place.
- Links with Children Missing Education, KPAS, SEND and Fair Access.
- Synergy case management system.
- Attendance app and lone-worker devices used by tutors.
- Tutors must hold Qualified Teacher Status and a Teacher Reference Number from the DfE.

Next Steps/ Actions

Now
Map QTS tutor and senior SEND leadership capacity against projected demand by unitary.

Next
Agree approach to disaggregating SLA with SEND.

Confirm Synergy licensing and DSG redistribution across successor authorities.

Future
Agree cross-boundary SLA or MoU preserving flexible deployment for statutory sixth-day duties.

Scope:
The SEND Tribunals service manages mediation and appeals to SENDIST, defending KCC's position on Education, Health and Care needs assessments, plans and provision for children and young people. It operates within a statutory legal framework governed by tribunal timescales and case law, with appeal volumes rising significantly.

Does Disaggregation by default apply to this service? Yes
Why?

There are no hard constraints to splitting the service, so disaggregation applies. However, Red-rated demand and staffing, appeal-volume growth and scarce specialist expertise plus statutory timescales make it operationally sensitive. Residual challenges from embedding the redesign in 2023 and pending tribunal legislation changes, requires risk mitigation rather than a change of pathway; LGR offers redesign opportunity.

1.2.28 Tribunals

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in three interlinked factors. First, Demand: appeals have risen by 150% over the last four years, with persistent geographic concentration in East Kent and a three-to-four-week backlog against statutory response timescales, meaning any split must not further erode statutory compliance. Second, Staffing: the service depends on a small specialist workforce with lengthy induction and CPD, recruitment difficulties, current vacancies and reliance on interim staff, all of which make fragmentation across smaller authorities operationally sensitive. Third, Delivery because the countywide model relies on flexible cross-area case sharing to balance uneven caseloads and on centralised support functions for appeal registration and bundle production. Budget is Amber, reflecting a single countywide staffing budget currently overspent through interim cover and no area-based allocation. Legislative is Amber given the statutory framework and impending SEND and Education White Paper reforms already influencing appeal volumes. Assets and Systems are Green, although shared reliance on Synergy is noted. What are the potential risks of disaggregation that need to be considered? The assessment identifies four principal risks of disaggregation: potential to create a variation in access and outcomes between areas under a multi-unitary model due to loss of countywide oversight; a need for larger area teams to replace current cross-area case sharing; potential loss and inequitable distribution of specialist expertise; and staff retention risks linked to locality-based models. The assessment reinforces that disaggregation would present risk to delivery of statutory tribunal timescales, compounded by pending tribunal legislative changes yet to be implemented. Backlogs and workforce fragility mean that any split without deliberate mitigation could worsen statutory compliance and residents' experience of appeals. Interim transitional uncertainty also exists over whether the current SEND service will need to be revised to respond to internal and external changes before LGR, which could shift the operating baseline.

Interdependencies
• Embedded across SEND assessment, casework, placements and inclusion functions. • Centralised appeal registration, bundle production and cross-area case sharing. • Synergy case management; shared access and licensing implications. • Global Mediation, INMSS placements, NHS, KEPS and neighbouring authorities.
Next Steps/ Actions
Now Map SEND interdependencies, clarify contract novation and confirm Synergy access and governance. Next Confirm statutory timescale assurance, specialist workforce scale and uneven East Kent demand. Future Build resilience for rising SEND demand through shared arrangements and cross-authority governance.



Table of Contents – CYPE – Operational Integrated Children’s Services

1.3 Operational Integrated Children’s Services

- 1.3.1 Adolescent Response Team
- 1.3.2 Dynamic Support Service
- 1.3.3 Early Help, Children's Social Work Services (Assessment & Safeguarding) for North, East, South and West, Children in Care and Adolescent Services
- 1.3.4 Family Hubs
- 1.3.5 I-Thrive and Participation
- 1.3.6 Social Connections Service
- 1.3.7 Turnaround
- 1.3.8 Youth Justice

[Return to table of contents](#)

Scope:
The Adolescent Response Unit is a small, centrally managed, in-house KCC service delivering non-caseholding, out-of-hours crisis intervention to adolescents and their families across Kent. It works intensively to prevent entry into care, avoid changes to care arrangements, and reduce extra-familial risks including exploitation and peer harm.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. The service is discretionary, with no external contracts, minimal asset dependency and a countywide staffing budget, so no statutory, contractual, asset or funding constraints prevent disaggregation. Demand, delivery model and workforce complexity are mitigation issues, not blockers.

1.3.1 Adolescent Response Team

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Longer term a decision is required regarding the staffing/service post March 2027. Current complexity is driven mainly by the Amber-rated Demand, Delivery Model, Staffing and Legislative factors rather than by statutory duties or infrastructure. Demand is countywide but unevenly distributed, combining higher-volume urban areas such as Thanet, Swale, Dartford/Gravesham, Ashford and Maidstone and is expected to grow without quantified projections. The delivery model relies on a single centrally overseen team with flexible deployment across Kent, including out-of-hours cover, which the assessment links to consistency of practice, allocation and coordination. Staffing complexity reflects a small 3.6 FTE practitioner cohort, reliance on experience-based specialist skills in adolescent work, trauma and contextual safeguarding, and fixed-term contracts running to 31 March 2027 which have already affected recruitment. The Legislative Amber rating reflects uncertainty from the Families First Transformation, which may reshape how much of the service is funded, how it is structured and how it is delivered.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies the main consequences of disaggregation as difficulty managing fluctuating demand and capacity across smaller units, and uncertainty over how out-of-hours workforce support, coordination and allocation would operate. Splitting the single management structure is described as risking loss of consistency in shared training and common practice, and reducing the flexibility to target areas of highest demand.

Interdependencies

- Most referrals originate from internal KCC social work teams.
- Relies on centralised Business Support, MIU and Practice Development.
- Uses Liberi for case recording.
- Shares contextual safeguarding via District Meetings; no external joint delivery.

Next Steps/ Actions

Now
Map fixed-term contract implications to 31 March 2027 and confirm the service decision.

Next
Confirm centrally managed referral, allocation and out-of-hours coverage across successor organisations.

Future
Align the future design with Families First Transformation and cost-avoidance objectives.



Scope:
The Dynamic Support Service provides intensive, multi-disciplinary support to autistic children and young people and those with learning disabilities aged 10–25 at risk of Tier 4 mental health admission. Aligned to NHS England's Keyworking function, the service is delivered countywide across Kent and Medway.

Does Disaggregation by default apply to this service? No

Why?
The assessment concludes that the service should remain countywide and cannot be effectively disaggregated. Splitting it would weaken the model, increase coordination and governance costs, dilute specialist workforce capacity, require complex funding and partnership changes, and create unnecessary transition risks for an extremely vulnerable cohort. While future unitary authorities could consider transferring responsibility back to the ICB due to the service's NHS statutory basis, the existing integrated pathways, governance arrangements and multidisciplinary teams mean a joint local authority–NHS model remains the most practical and effective approach.

1.3.2 Dynamic Support Service

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (R)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is driven by high-risk demand, specialist workforce requirements, and funding uncertainty. Demand (Red) is unevenly distributed, with consistent concentration in Canterbury, Thanet and Medway and lower volumes in Ashford, Gravesham and Sevenoaks, meaning any split would need careful redistribution of capacity to avoid under-resourcing high-demand areas. Staffing (Red) relies on hard-to-replicate practice roles (including Practice Consultant, Occupational Therapy Lead and Senior Educational Psychologist) and on professionally regulated staff whose small numbers make replication across multiple unitaries challenging. The budget (Red) would be difficult to disaggregate as it is entirely funded by the ICB meaning funding decisions sit outside the unilateral control of successor authorities. Delivery Model (Amber) and Assets/Systems (Amber) add further complexity through countywide multi-agency coordination and dependence on a single electronic Dynamic Support Database (eDSD) system which would need to be replicated if the service were split.

What are the potential risks of disaggregation that need to be considered?
The assessment evidences four principal risks and consequences. First, fragmentation of a single model for a cohort at high risk of hospital admission could reduce consistency of risk stratification and case management across the register, with direct consequences for admission avoidance. Second, dilution of specialist capacity could create recruitment and retention exposure across multiple smaller teams. Third, an increase in system partner interfaces could create additional coordination requirements across multiple unitary authority relationships with the ICB and NHS Trusts, with potential implications for the timeliness and effectiveness of crisis response. And fourth, disaggregation would require the complex renegotiation of funding arrangements and system-wide partnership agreements that are currently designed for a single Kent and Medway footprint.

Interdependencies

- Interdependent with KCC safeguarding, SEND, Local Inclusion Forum Teams, Kent and Medway Complex Autism Service, and the Specialist Teaching and Learning Service.
- Kent and Medway ICB is sole funder of delivery. Medway Council is a key non-funding stakeholder within the countywide footprint.
- Kent and Medway Mental Health NHS Trust and Provider Collaborative.
- Involve Kent advocacy and QES eDSD software contracts.

Next Steps/ Actions

Now
Engage the ICB on funding continuity.

Next
Decide whether the service reverts to the ICB or continues as shared NHS/LA delivery.

Future
Sustain a countywide model preserving the single register and specialist workforce across successor authorities.

Scope:
The assessment covers four CYPE services delivering Kent's children's safeguarding pathway: Early Help supports families before needs escalate; Children's Social Work Services undertake statutory assessment and safeguarding under the Children Act 1989; Adolescent Services provide trauma-informed support for contextual risks; and Children in Care meet looked-after duties, including Family Time.

Page 129
Does Disaggregation by default apply to this service? Yes
Why?

There is no reason the service is unsuitable for disaggregation by default. Their integration and countywide interdependencies — quality assurance, commissioning, management information, legal and multi-agency partnerships — make disaggregation complex but not a material barrier. Statutory duties require continued multi-agency collaboration, not countywide delivery. Sequencing against the Families First reforms, disaggregation is feasible with careful transition planning.

1.3.3 Early Help, Children's Social Work Services, Children in Care, and Adolescent Services

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Delivery model is the strongest driver of complexity and is rated Red because the four services rely on a spine of CYPE countywide functions (statutory quality assurance (IROs, CP Chairs, SQAPS), Management Information, Total Placements Service, Social Connections, fostering teams and embedded but centrally managed business support) which sit outside the operational teams themselves. Demand is Amber and geographically uneven, with volume and complexity concentrated in Thanet, Swale, Canterbury, Maidstone and Ashford, meaning any split would inherit unbalanced pressure. Budget complexity is Amber, driven by multiple funding streams (core, Families First, UASC, health contributions, grants) and cross-area teams for Adolescents and FGC. Staffing is Amber given 899.62 FTE, heavy reliance on Social Work England registered roles, and recognised recruitment and retention shortages in coastal areas. Assets & Systems is Amber because case management, safeguarding and reporting depend on shared platforms (Liquidlogic Liberi, EHM, Core+, MARAC), with the assessment noting that disaggregation would require system replication, licensing and data migration. Finally, the ongoing Families First transformation, expected to go live before LGR, will change the delivery model itself and adds a live implementation consideration.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies fragmentation of centralised quality assurance, commissioning and safeguarding oversight as a primary consequence, with the potential for weaker multi-agency coordination and variation in thresholds and responses across new organisations. Uneven demand distribution, particularly high-cost, high-complexity such as Children in Care and Unaccompanied Asylum-Seeking Children, could leave successor bodies holding disproportionate volumes of complex work and reduce the current ability to flex resources across areas. Workforce fragmentation and increased inter-authority competition for regulated social workers is flagged, compounded by existing national shortages. Loss of economies of scale and duplication of systems and infrastructure are also identified, alongside the operational instability and reform fatigue of layering disaggregation onto the Families First redesign already underway. The assessment also notes clear opportunities, including stronger place-based responsiveness, sharper local accountability and closer alignment of funding to local demand, which would be the consequential upside of a well-sequenced split.

Interdependencies

- Countywide CYPE QA,CPC, IRO, MI, placements and fostering functions
- Shared systems (Liquidlogic Liberi, EHM, Core+) for safeguarding
- Statutory multi-agency partners: NHS, Police, education (MARAC)
- Invicta Law, KIDAS, Youth Justice and placement commissioning

Next Steps/ Actions

Now
Map cross-area resource sharing and quantify system replication, licensing and data migration costs.

Next
Sequence disaggregation against Families First; plan workforce transfer and coastal recruitment.

Future
Sustain safeguarding consistency, multi-agency governance and demand-linked funding across successor organisations.

Scope: Family Hubs provide preventative and early help support for children, young people and families across Kent, from pregnancy to age19 (or 25 for those with SEND). The service covers universal and targeted needs closely linked to deprivation.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies. Operational delivery is already district-based with locally aligned staff. The Red delivery-model rating and Amber ratings reflect implementation complexity — centralised functions, countywide partnerships, grants, shared systems and recruitment — but these are addressable through sharing arrangements or redesign, not inherent barriers.

1.3.4 Family Hubs

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Delivery model complexity is rated Red because Family Hubs combine district-aligned operational teams with countywide partnership, participation, digital delivery and transformation functions, and rely on centralised CYPE services including MIU, Practice Development, commissioning and Business Support. Extensive operational interdependencies with NHS-commissioned midwifery, health visiting and perinatal mental health services delivered from Family Hub buildings, together with VCSE partners, education, early years, libraries, police and district councils, make the model networked rather than standalone. Budget complexity (Amber) is reinforced by mixed funding streams and a countywide DfE/DHSC grant. Assets and systems complexity (Amber) reflects a 56-building estate integral to co-location with health partners, and shared corporate platforms such as the Idox directory and the EasyPeasy App where separation may be problematic or incur additional cost. Staffing (Amber) is shaped by recruitment difficulties in North Kent, and by reliance on Business Support that sits outside the service establishment. Demand (Amber) is geographically uneven and deprivation-linked.

What are the potential risks of disaggregation that need to be considered?

There is an evidenced risk of losing economies of scale for the countywide participation, partnership, digital and transformation functions currently funded and delivered at county level. Reduced ability to collaborate countywide and share learning and capacity is highlighted as a further consequence. The assessment also flags an opportunity to localise services to better meet community needs within existing grant commitments, which should be weighed alongside these risks. Wider evidenced consequences include the interdependency between the countywide DfE/DHSC grant and staffing budgets, which could complicate financial continuity, and dependence on co-location with NHS services in Family Hub buildings, where altered governance or ownership could disrupt integrated delivery. The assessment identifies loss of consistency across the 12 districts as a primary risk, with direct consequences for performance against the DfE Good Level of Development target.

Interdependencies

- Centralised CYPE functions and countywide partnership, participation and transformation teams.
- Shared systems: Idox directory, Core Plus, EasyPeasy App.
- NHS midwifery, health visiting and perinatal services co-located onsite.
- DfE/DHSC grant, VCSE partners and statutory child-protection duties.

Next Steps/ Actions

Now

Map staffing splits, shared-system options, contract routes and district budgets against current pressures.

Next

Decide which countywide functions, grants and shared systems are retained, replicated or jointly governed.

Future

Design a localised model that sustains partnerships, safeguarding duties and consistent resident access.

Scope:
The i-THRIVE and Participation service supports improved emotional wellbeing and mental health for children and young people by embedding the national iTHRIVE framework across the Kent and Medway system and strengthening young people's voice in shaping services. It provides system leadership for children's mental health and youth participation across Kent.

Does Disaggregation by default apply to this service? Yes

Why?
The assessment shows no whole-service barrier to disaggregation. Countywide system leadership combines with district-level delivery, and evidence indicates most elements can be replicated or re-provided by new authorities. Demand is countywide and broadly balanced. Disaggregation-by-default applies, provided the future model manages the ICB footprint, partner funding and transition of specific components.

1.3.5 I-Thrive and Participation

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

The main complexity is that the service is delivered in-house on a countywide basis and performs a strategic system-wide coordination role across the Kent and Medway footprint. The delivery model is rated Red because several core elements sit above the scale of a single new authority, including the i-THRIVE framework, the MHST rollout and hosted digital assets used across Kent. Partner interdependency is material, as NHS Kent and Medway funds the majority of i-THRIVE roles and authorises delivery expectations, while Kent Police, the Kent & Medway Violence Reduction Unit and SEND are also referenced. Staffing adds complexity because the service is small, at 10.5 FTE, with specialist roles that are considered easy to replicate but not affordable within the current budget position. Budget and legislation are also Amber because quantified budget information, MTFP commitments, statutory status and some policy implications remain unresolved.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies two main risks: maintaining consistency of mental health implementation across Kent and Medway, and the potential loss of youth participation arrangements that support UK Youth Parliament representation and national representation on youth issues. A further consequence is that the current mental health in schools-related team could not be replicated across multiple authorities in its present form, so each new education authority would need an appropriate mental health or schools' mental health role. Funding continuity is a material consequence because the majority of i-THRIVE roles are externally funded, and the budget required for role replication is not currently available. The transition of the Kent Resilience Hub and Mood Spark websites to the VCS is another consequential implementation point, particularly because hosting, licensing, data and ownership arrangements are not yet defined. These are transition and design consequences rather than evidence of a whole-service prohibition on disaggregation.

Interdependencies

- NHS Kent and Medway funds most i-THRIVE roles.
- Resilience Hub and Mood Spark websites need VCS transition.
- Safeguarding governance runs through CYPE ICS operations.
- Countywide ICB footprint needs neighbourhood-level responsiveness.

Next Steps/ Actions

Now

Confirm 2026/27 budgets, external funding levels, and map NHS-funded i-THRIVE and mental health roles.

Next

Clarify website hosting, licensing and data arrangements, and plan VCS transition of digital assets.

Future

Design a disaggregated model preserving mental health consistency and sustained youth participation across authorities.

Scope:
The Social Connections Service works with children at risk of entering care, and those in care, to strengthen family networks and support safe, family-led decision-making. It delivers the nationally accredited Family Group Conference offer, including the now statutory FGC offer at pre-proceedings under the Children's Wellbeing and Schools Act 2026, and provides Lifelong Links to sustain relationships where children enter care. Delivery is in-house across Kent through two geographically aligned teams (North and West; South and East).

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies: all six complexity drivers are rated Green. The service already operates on an area basis through two similarly sized teams, each with its own budget and workforce; demand across the two areas is also broadly even. Family Group Conference delivery can be replicated locally through affordable training, provided authorities maintain Family Rights Group accreditation standards.

1.3.6 Social Connections Service

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
No critical complexity factors were identified in the assessment; all six drivers are rated Green, with the service well positioned to disaggregate. The assessment does, however, flag a small number of implementation considerations. The county-wide accredited Family Group Conference and Lifelong Links offer would need to be replicated so each successor authority meets Family Rights Group accreditation standards, and the single authority-wide Genopro licence would require a separate licence for each new unitary. In addition, the majority of the budget is grant-funded through the DfE Families First Programme Grant, and the assessment notes that grant conditions have not been tested against a disaggregated model. These points are framed as implementation considerations rather than material barriers.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies two main risks. First, the accredited county-wide offer could be diluted and delivered inconsistently by different successor authorities, weakening a model that has been commended by Ofsted across multiple inspections. Second, the current flexibility to deploy staff and budgets across the two areas would be lost once new unitary boundaries are drawn, reducing operational resilience within any single successor authority. The assessment balances these risks with the clear view that standalone delivery is achievable where each authority adheres to Family Rights Group accreditation standards and where a data-sharing agreement supports cross-boundary family networks. On the evidence provided, the consequences of disaggregation are manageable rather than prohibitive.

Interdependencies

- Strong council relationships but no operational interdependencies; coordinated handover needed.
- Single authority-wide Genopro licence needs replicating per unitary.
- Family Rights Group accreditation contract; reaccreditation due August 2026.
- DfE Families First grant funds

Next Steps/ Actions

Now
Procure separate Genopro licences and draft data-sharing agreements for cross-boundary family networks.

Next
Confirm how the DfE Families First grant and Family Rights Group accreditation are redistributed.

Future
Sustain consistent FGC and Lifelong Links standards and accreditation within each successor authority.

Scope:
The Turnaround Programme is a Ministry of Justice grant-funded, non-statutory early intervention service for adolescents at risk of offending, delivered in-house by Kent County Council. Using a trauma-informed, whole-family approach, it supports young people into education, training and employment as a protective factor against offending and exploitation.

Does Disaggregation by default apply to this service? Yes

Why?

There is no strong reason the Turnaround Programme cannot be disaggregated, with Green ratings on Assets/Systems and Legislative Basis: standard accommodation, no specialist equipment, CorePlus for case recording and a discretionary basis. Amber Demand, Delivery Model, Budget and Staffing make separation feasible but complex, given the small 5.4 FTE cohort and time-limited grant.

1.3.7 Turnaround

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity arises from the interaction of four Amber drivers rather than any single blocker. Demand is unevenly distributed across Kent, with Thanet carrying a significantly higher cohort, and children present with multiple, intersecting vulnerabilities requiring intensive, trauma-informed and whole-family interventions. The delivery model is countywide with locality-aligned practitioners but relies on central management and business support for performance, budget and Ministry of Justice reporting, and on Early Help or Social Workers retaining case responsibility. The budget is a dedicated Ministry of Justice grant, time-limited to 31 March 2029, held centrally to allow flexible response to need, with underspends returnable to the funder. Staffing is modest at 5.4 FTE with recruitment and retention pressures linked to fixed-term contracts, and the assessment notes disaggregation would be challenging with such a small cohort.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies that area-based staffing could become too small to be sustainable if the current 5.4 FTE cohort is split. Disaggregation could disrupt embedded, joined-up working within Adolescent Early Help Units and weaken local knowledge, coordination and relationships, this has the potential to delay children's access to education, training and employment opportunities if not addressed. There is a risk to programme performance, data quality and compliance with Ministry of Justice grant requirements if central oversight is diluted, with potential reputational and funding consequences. The assessment also flags that fragmenting the multiple interdependencies with other KCC services and external partners could introduce coordination risk.

Interdependencies

- Practitioners embedded within Adolescent Early Help Units under Unit Leads.
- Depends on KPAS, inclusion, post-18 participation and SEND services.
- Central management holds budget, performance and Ministry of Justice reporting.
- Police referral prerequisite; CorePlus case recording; MoJ grant to 2029.

Next Steps/ Actions

Now

Map interdependencies and clarify fixed-term contracts and CorePlus record continuity to March 2029.

Next

Engage the Ministry of Justice on grant conditions, reporting and underspend implications.

Future

Preserve viable operational scale and embedded working within Adolescent Early Help Units.



Scope:
Youth Justice is a statutory, multi-agency service for children aged 10–17 at risk of, or involved in, offending, alongside families and victims. Delivered countywide under the Crime and Disorder Act 1998 through four locality teams and central statutory functions, including six-day court coverage and 365-day Intensive Supervision, with 33 FTE.

Does Disaggregation by default apply to this service? Part

Why?

Youth Justice could follow a hybrid model, retaining countywide statutory functions, specialist roles, shared systems and partnership governance while allowing locality teams to integrate with new authorities. Full disaggregation would duplicate boards, systems and rotas, weaken partner alignment and reduce resilience for statutory court and ISS coverage.

1.3.8 Youth Justice

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in the Legislative basis and Delivery Model, both rated Red. Statutory requirements under the Crime and Disorder Act 1998 fix the existence of a Youth Justice Service and Youth Justice Plan for each local authority, limiting governance flexibility and relying on effective multi-partnership working. The delivery model combines four locality teams with countywide statutory rotas, central specialist functions and flexible deployment, all of which are difficult to replicate at smaller scale. Staffing complexity (Amber) reflects a small, specialist workforce of 33 FTE, recruitment challenges and reliance on apprenticeship and Youth Justice Board effective practice pathways. Budget complexity (Amber) arises from reliance on multiple time-limited national grants (YJB core grant, MoJ remand and Turnaround grants) and partner contributions managed on a countywide basis.

What are the potential risks of disaggregation that need to be considered?

Partner misalignment is a specific consequence: where partners such as Police, Probation and NHS are not being disaggregated, structural change on the KCC side risks duplication and coordination friction. The assessment identifies material risks including inconsistencies in practice and information sharing, the financial impact of replicating central functions, difficulty disaggregating commissioned services, and the requirement for multiple Youth Justice Management Boards. Operational resilience of court coverage and statutory rotas could be undermined if central capacity is fragmented. Duplicated CorePlus licences would create additional contractual cost. The assessment also notes that the current model is likely to change under Families First transformation, so any disaggregation decision would need to be sequenced against that programme. The recommended pathway of continued countywide arrangement is presented as a means of managing these consequences while enabling greater locality integration at the front line.

Interdependencies

- Integrated Children's Services underpinning prevention, diversion, VSK, TEP and QA.
- Partnership with Police, Probation, Health, Education and Youth Justice Board.
- Shared Remand Coordinator and remand alternatives project with Medway YJS.
- Commissioned Appropriate Adult service and CorePlus contract with licensing implications.

Next Steps/ Actions

Now

Map staffing and central specialists; confirm CorePlus access, data sharing and statutory reporting continuity.

Next

Confirm whether each unitary needs its own Youth Justice Service or shared arrangement.

Future

Sustain specialist workforce and align with the 2026 Youth Justice White Paper.

Scope:
The CYP Commissioning Function secures sufficient, safe and high-quality services to meet the statutory needs of children, particularly those requiring care, placements and specialist support. It plans demand, shapes markets, procures and contracts services, and manages providers. Operating countywide and predominantly in-house, it incorporates the Total Placement Service.

Does Disaggregation by default apply to this service? Yes
Why?

There is no reason the service is unsuitable for disaggregation by default. Delivery is countywide and predominantly in-house, resources are flexed across service lines rather than tied to geography, and no material contractual, statutory or system constraints are evidenced. Workforce dependence on senior commissioners and regulated social work roles is a business risk, not a barrier.

1.4.1 CYP Commissioning: CYP Commissioning Function including Total Placement Service and TPS Contracting/Business Function

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
No critical complexity factors were identified. The assessment does note a few contextual points to be mindful of: a reliance on a small number of experienced senior commissioners; regulated social work roles within TPS and the Continuing Care Lead, where recruitment has proved challenging; and existing shared frameworks with Medway Council. These are best understood as workforce and delivery considerations rather than material barriers to disaggregation.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies loss of specialist knowledge across service areas and the lean management structure which depends on the experience of a small senior commissioner group as the principal risks of disaggregation. Splitting the function could dilute specialist capacity and create single-point dependencies unless senior expertise is deliberately replicated within successor arrangements. There is an opportunity from the removal of two-tier working, which could support a cleaner future commissioning footprint. No further consequences are explicitly evidenced as material to disaggregation in the assessment.

Interdependencies

- Interdependent with commissioned services: TEP (Education), SEND and UASC.
- Shared Fostering and Tuition frameworks with Medway Council.
- Lead Commissioner Adoption Partnership South East (Kent, Medway and Bexley)
- Partner working with NHS, Police/OPCC on rights and advocacy.
- ICB joint funding for SLCN and Continuing Care.

Next Steps/ Actions

Now
Map Medway shared framework terms and clarify UASC and ringfenced grant conditions.

Next
Confirm Controcc data migration and how regulated social work roles are structured.

Future
Secure cross-boundary governance with NHS, OPCC and ICB, mitigating senior commissioner dependency.

Table of Contents – GET

Kent County Council – Divisional Groupings · click any entry to open its slide

2 GET

2.1 Environment and Circular Economy

[2.1.1 Communications and Engagement](#)

[2.1.2 Programme and Business Services](#)

2.2 Environment and Circular Economy: Resource Management and Circular Economy

[2.2.1 Kent Resource Partnership](#)

[2.2.2 Resource Management and Circular Economy](#)

2.3 Environment and Circular Economy: Environment

[2.3.1 Country Parks](#)

[2.3.2 Countryside Partnerships](#)

[2.3.3 Energy and Adaptation](#)

[2.3.4 Flood and Water Management](#)

[2.3.5 Heritage Conservation](#)

[2.3.6 Kent Downs National Landscapes](#)

[2.3.7 Natural Environment and Coast](#)

2.4 Growth and Communities

[2.4.1 Innovation and Business Intelligence](#)

[2.4.2 Planning Applications and Minerals and Waste Planning](#)

2.5 Growth and Communities: Community Protection

[2.5.1 Community Safety, including Community Wardens](#)

[2.5.2 Community Safety : Domestic Homicide Reviews](#)

[2.5.3 Coroners Service](#)

[2.5.4 Kent Scientific Services](#)

[2.5.5 Trading Standards](#)

2.6 Growth and Communities: Economy

[2.6.1 Business Investment](#)

[2.6.2 Economic Strategy, Partnerships & Programmes](#)

[2.6.3 Grow in Kent \(Visit Kent and Invest Kent\)](#)

[2.6.4 No Use Empty](#)

[2.6.5 Skills and Employment](#)

[2.6.6 Village Halls and Old Rectory](#)

2.7 Growth and Communities: LRA

[2.7.1 Archives](#)

[2.7.2 Libraries](#)

[2.7.3 Registration](#)

2.8 Growth and Communities: Strategic Development & Place

[2.8.1 Active Kent & Medway](#)

[2.8.2 Broadband](#)

[2.8.3 Creative Economy](#)

[2.8.4 Development Investment Team](#)

[2.8.5 Gypsy Roma Traveller Residents Service](#)

[2.8.6 Public Rights of Way](#)

[2.8.7 Straits Committee Partnership](#)

[2.8.8 Strategic Planning & Infrastructure](#)

2.9 Highways and Transportation

[2.9.1 Strategic Contracts and Commissioning](#)

[2.9.2 Strategic Resilience](#)

2.10 Highways and Transportation: Highways Asset Management

[2.10.1 Highways Asset Management 1 - Strategic Assets, Street Lights assets, Soft landscape assets, Drainage assets, Structures and tunnels assets, and Carriageway/footways/cycleway assets](#)

[2.10.2 Highways Asset Management 2 - Safety Inspections, Routine Maintenance, Emergencies, Winter Service, Priority Response, Vehicle Crossings, High Speed Roads Programme, Fly-tipping and Enforcement](#)

[2.10.3 Highways Asset Management 3 - Streetworks, Compliance/Data Team](#)

2.11 Highways and Transportation: Public Transport

[2.11.1 Client Transport Operations and Planning](#)

[2.11.2 Fastrack Development](#)

[2.11.3 Public Transport Business Team](#)

[2.11.4 Public Transport Planning and Operations](#)

2.12 Highways and Transportation: Transportation

[2.12.1 Active Travel](#)

[2.12.2 Major Capital Projects](#)

[2.12.3 Road Safety](#)

[2.12.4 Traffic Management](#)

[2.12.5 Traffic Operations and Technology](#)

Table of Contents – GET – Environment and Circular Economy

2 GET

2.1 Environment and Circular Economy

2.1.1 Communications and Engagement

2.1.2 Programme and Business Services

Scope:
The ECE Communications and Engagement Service is a centralised, specialist function in the Environment and Circular Economy Division. It designs and delivers commissioned, project-based communications, engagement and behaviour-change activity across sustainability, climate action, recycling, active travel, and health and nature priorities. Delivery is countywide, focused on East and North Kent. Through collaboration with Public Health and other system partners, the service also helps realise wider co-benefits for the environment, population health and the visitor economy.

Does Disaggregation by default apply to this service? Yes

Why?

There is no whole-service barrier to disaggregation by default. Statutory and regulatory frameworks do not mandate a single organisational form, contracts are time-limited and divisible, and external partnerships are programme-based rather than critical operational dependencies. Delivery is already distributed, combining countywide commissioning with place-based delivery and flexible specialist staff.

2.1.1 Communications and Engagement

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? The budget model is fragmented and largely reliant on external funding and generated income, Public Health and Extended Producer Responsibility (EPR) funding and core funding which complicates the allocation of income and cost across successor authorities. Shared digital infrastructure including the Explore Kent platform, Greener Kent channels and licensed communication tools is used across multiple services and would require license transfer, duplication or governance design. Countywide prioritisation of demand sits alongside place-based delivery in areas of inequality, meaning coordination mechanisms would be needed to sustain consistent priority setting. Although discretionary, alignment with statutory duties and forthcoming reforms, Simpler Recycling, the Deposit Return Scheme, Emissions Trading Scheme impacts and NHS Neighbourhood Health, reinforces the need for consistent, system-wide messaging.
What are the potential risks of disaggregation that need to be considered? Loss of scale and shared learning in environmental behaviour change, and fragmentation of specialist capacity across multiple units, are the principal risks. Explore Kent commissions are flagged as exposed to increased complexity and slower delivery if the current centralised commissioning arrangement is separated across successor authorities. Governance, branding and consistency risks are highlighted where multiple authorities would need to sustain aligned communications across the waste, health and prevention systems that legislation increasingly treats as integrated. The assessment reinforces that funding complexity and reliance on external sources introduce financial transition consequences, and that shared systems and embedded roles create implementation complexity rather than an absolute barrier. Opportunities noted include stronger place-based alignment and alternative arrangements such as SLAs, hybrid or shared service models, where well designed.

Interdependencies
• Interdependent with ECE, Resource Management & Circular Economy (RMCE), GET, Public Health and Transport. • Behaviour-change roles embedded within RMCE and Marketing, Resident Experience (MRX). • Relies on central MRX and shared analytics. • Public Health/EPR funding; Explore Kent and Greener Kent platforms.
Next Steps/ Actions
Now Map staffing, specialist roles and shared platform licences for allocation or replication. Next Agree future arrangements for Explore Kent and allocation of Public Health and EPR funding. Future Sustain specialist behaviour-change capability and scale efficiencies through a shared or hybrid model.



Scope:
ECE Programme and Business Services is a centrally coordinated, countywide internal function within the ECE Division. It delivers business management, governance, performance and programme/project coordination, alongside ISO 14001 environmental management certification across all KCC-owned sites, combining high-volume transactional activity with specialist programme management, environmental auditing and regulatory compliance.

Does Disaggregation by default apply to this service? Yes

Why?

The service can be treated as disaggregation by default: a centrally coordinated internal function with no legislative requirement for geographic delivery and no geographic budget allocation. Transactional and business support elements separate most readily, while specialist environmental compliance, governance and programme management would need careful design or continued central coordination to preserve ISO 14001 continuity.

2.1.2 Programme and Business Services

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in staffing and assets/systems, both rated Amber. The team is small at 5 FTE, with specialist capability concentrated in a limited number of roles, notably the Environment Management Officer, where the assessment notes that recruitment to replicate the role could be difficult given the combination of ISO 14001 Lead Auditor, NEBOSH and environmental science qualifications required. Delivery relies on specialist digital systems (BSI Portal, BSI Connect and Barbour Consolidated) and countywide access to KCC-owned operational sites for ISO 14001 audit activity, meaning disaggregation would require replication of system licenses and coordinated site access arrangements. The service is also centrally coordinated across the division, with embedded interdependencies covering finance, governance, reporting, FOIs, recruitment and programme management, so any split would require reconfiguration of shared processes to preserve consistency and specialist oversight.
What are the potential risks of disaggregation that need to be considered? The principal risk of disaggregation is reduced consistency and assurance in environmental management and compliance activities if specialist functions are no longer centrally coordinated. A specific risk is disruption to ISO 14001 certification, which depends on ongoing external audit arrangements with BSI and successful implementation of the revised ISO 14001 standard by 2029. There is also a risk of reduced service resilience, as specialist expertise may become harder to sustain across successor organisations, particularly where niche environmental, audit and compliance skills are required. Disaggregation would require support services currently provided by the team, including governance, finance, recruitment, programme management, FOI handling and complaints coordination, to be replicated or redistributed, creating additional implementation costs and potential service fragmentation. It is noted in the assessment that there are elements of the service that could operate closer to individual services, particularly where support is more transactional or aligned to day-to-day operational needs. This could provide more direct access and flexibility in some areas, such as business support activity or programme monitoring and delivery.

Interdependencies
- Wider GET directorate relies on finance, governance, FOIs and reporting. - Central coordination of reporting frameworks across ECE services. - Countywide access to KCC sites for ISO 14001 audits. - BSI ISO 14001 audit contract (£5,596, renewed annually).
Next Steps/ Actions
Now Map GET dependencies and quantify licensing replication for BSI and Barbour systems. Next Agree treatment of the BSI contract and split of transactional versus specialist functions. Future Adopt a hybrid model retaining central coordination and ISO 14001 certification continuity.



Table of Contents – GET – Environment and Circular Economy: Resource Management and Circular Economy

2 GET

2.2 Environment and Circular Economy: Resource Management and Circular Economy

2.2.1 Kent Resource Partnership

2.2.2 Resource Management and Circular Economy

Scope:
The Kent Resource Partnership (KRP) brings together KCC and the twelve district and borough councils to deliver the Kent Joint Municipal Waste Management Strategy which is a statutory requirement in the current two-tier local government system. Partners' responsibilities cover collected household waste and its treatment, plus street cleansing and enforcement.

Does Disaggregation by default apply to this service? No

Why?

Kent Resource Partnership is contingent on the current two-tier model of local government and supports the current statutory requirement for a joint strategy, which will no longer apply. Consideration will need to be given to how this service should be managed through the LGR process. Its strategic value lies in countywide waste coordination and intelligence sharing. A future partnership could be re-established across the new unitaries with revised hosting and membership.

2.2.2 Kent Resource Partnership

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is influenced primarily by the current delivery model, rated Red. KRP is a countywide partnership hosted by KCC that provides strategic coordination, intelligence sharing and joint initiatives rather than direct operational delivery. As Local Government Reorganisation progresses, the current two-tier distinction between waste collection and waste disposal responsibilities will no longer apply, meaning the future role and purpose of the partnership will need to be considered. There are also workforce considerations as the partnership operates with a small team of 2.5 FTE, meaning there is limited scope to distribute existing roles across multiple organisations. If there is a desire to retain elements of the current function, a hosted or shared arrangement may provide continuity, reflecting the current operating model. The Intelligence Analyst role provides a countywide intelligence and coordination function, supported by specialist skills, security clearance and established data-sharing arrangements with organisations including the Environment Agency, Joint Unit for Waste Crime, HMRC, DVLA and Kent Police and would be difficult to replicate at county level without duplication. Consideration would therefore be needed as to how these relationships and capabilities are maintained in any future operating model.

What are the potential risks of disaggregation that need to be considered?

A key consideration is how countywide intelligence sharing, coordination and partnership working would operate in the future if the current arrangements were changed. Decisions would be needed on whether these functions should continue through a shared arrangement, be hosted by a single authority, or be delivered separately by individual unitary councils. If no replacement arrangements were established, some existing countywide activities, such as intelligence coordination and behaviour-change campaigns, may become more locally focused. While this could allow approaches to reflect local priorities, it may also reduce opportunities for collaboration and shared delivery across administrative boundaries. Any future model would therefore need to balance local flexibility with the benefits currently associated with coordinated countywide activity.

Interdependencies

- Waste services across KCC and twelve district and borough councils.
- Governed via the Kent & Medway Environment Members Board.
- KCC hosts the Strategic Lead, budget and Intelligence Analyst.
- Analyst data-sharing with Environment Agency, HMRC, DVLA and Kent Police.

Next Steps/ Actions

Now

Assess immediate risks to intelligence-sharing agreements and map external data-sharing arrangements pre-Vesting Day.

Next

Decide whether a countywide waste partnership continues post-LGR, and its hosting and purpose.

Future

Design a proportionate shared or hosted model preserving cross-boundary enforcement and intelligence capability.

Scope:
The Resource Management and Circular Economy service delivers KCC's statutory Waste Disposal Authority functions. It manages household waste through eight Waste Transfer Stations, nineteen Household Waste Recycling Centres and a countywide network of treatment, disposal and waste infrastructure, working closely with district and borough Waste Collection Authorities.

Does Disaggregation by default apply to this service? Yes

Why?

There are no structural barriers to disaggregation, but the current service benefits significantly from countywide coordination. Shared infrastructure, contractual arrangements and collection-disposal interdependencies would require careful restructuring to minimise cost, efficiency and resilience impacts.

2.2.1 Resource Management and Circular Economy

Covering: Insight & Development, Service Delivery, Environmental Infrastructure & Compliance, Circular Economy

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (R)	●	Assets/ Systems (R)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Delivery complexity is the most significant factor. The service operates as a coordinated countywide disposal system, combining central strategic management, partnership working with Waste Collection Authorities and outsourced delivery through more than 40 contracts. Long-term infrastructure agreements are designed around whole-system waste flows, treatment capacity and tonnage commitments. Budget complexity is closely linked, with a substantial centrally managed budget, significant contract expenditure and economies of scale achieved through countywide procurement. Assets complexity arises from a dispersed network of 19 HWRCs, Waste Transfer Stations, 63 closed landfill sites (20 actively monitored) and shared treatment infrastructure, including the Allington Energy from Waste facility and disposal locations both within and outside Kent. Demand complexity reflects specialist waste streams, uneven countywide waste volumes and environmental regulation. Staffing complexity centres on a small, specialist workforce of 29.1 FTE covering operations, closed landfill monitoring, compliance and contract management, with succession risks flagged. Legislative complexity stems from the Waste Disposal Authority role and major waste policy reforms due by 2029. What are the potential risks of disaggregation that need to be considered? The principal risk is losing the operational, commercial and resilience benefits of an integrated countywide waste system. Divergence in collection arrangements could increase disposal costs, reduce efficiency and create additional treatment contract complexity. Fragmentation of waste volumes may weaken procurement leverage and create competition between authorities for limited treatment capacity. Significant contractual challenges would arise from the novation, renegotiation or re-procurement of countywide contracts. Shared infrastructure arrangements, particularly for the Allington Energy from Waste facility, would require new governance, access and tonnage management arrangements. Operational resilience could be reduced if waste flows and contingency arrangements become less coordinated during incidents such as fires, plant outages, severe weather or capacity constraints. Specialist responsibilities, particularly closed landfill monitoring and environmental compliance, would need to remain effectively coordinated through any future operating model. Potential benefits include greater local influence over service design and closer alignment to local priorities.

Interdependencies
- Waste Collection Authorities (districts and boroughs) and Kent Resource Partnership. 40+ contracted collection, transfer, disposal operators and reprocessors. - Environment Agency permitting and DEFRA policy and reporting. - Internal links: Highways, Legal, Finance, Kent Analytics and Digital.
Next Steps/ Actions
Now Map key collection, disposal and contractual dependencies across the countywide waste system, including contracts by value, term and geography Next Agree procurement approaches, collection policy coordination, infrastructure access arrangements for shared facilities, and how contracts are novated or re-procured. Future Maintain resilience, treatment capacity and scale for disposal functions and aligning with incoming waste reforms.

Table of Contents – GET – Environment and Circular Economy: Environment

2 GET

2.3 Environment and Circular Economy: Environment

2.3.1 Country Parks

2.3.2 Countryside Partnerships

2.3.3 Energy and Adaptation

2.3.4 Flood and Water Management

2.3.5 Heritage Conservation

2.3.6 Kent Downs National Landscape

2.3.7 Natural Environment and Coast

Return to table of
contents

Scope:
Country Parks sits within the GET Environment and Circular Economy Division and manages nine country parks across Kent. The estate covers 601.7 hectares of which 94% is nationally important protected landscape receiving around 1.2 million visits a year.

Does Disaggregation by default apply to this service? Yes

Why?

The service can be treated as disaggregation by default. Site-based operations, geographically distributed demand across nine parks, and site-specific statutory landowner obligations (notably management of Sites of Special Scientific Interest - SSSI) make the service separable at component level. Central coordination, flexible staff deployment, portfolio-level funding bids, cross-subsidy between parks and shared datasets create coordination complexity rather than structural barriers.

2.3.1 Country Parks

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Delivery model complexity stems from a hybrid structure in which area-based park teams are supported by central specialist roles (Visitor Experience, Marketing and Communications, Catering, Ranger Services, Operations) and by flexibly deployed rangers, plant and equipment moving between sites. Budget complexity reflects a mixed funding model combining KCC base budget, self-generated income, DEFRA and Heritage Lottery grants, and Section 253 and Section 106 arrangements, alongside cross-subsidy between parks and an MTFP savings requirement dependent on income growth. Staffing complexity arises from a 42.82 FTE workforce (excluding seasonal and relief staff) carrying licensed and technical roles (chainsaw, LANTRA, dormouse handling, AIM-accredited education, protected landscape management typically requiring around five years' experience) with location-specific recruitment challenges. Assets and systems complexity reflects high-value distributed equipment (play equipment, tractors, wood processing plant, pay and display machines) alongside shared platforms including the integrated JRNI booking and ECP parking system and the single My Trees veteran tree database used across three sites. Legislative complexity comes from statutory SSSI landowner obligations, anchoring management responsibilities to specific geographies. What are the potential risks of disaggregation that need to be considered? Management of nationally significant landscapes depends on specialised ecological and technical skills held within a small team, and that disaggregation could increase costs or dilute this knowledge base. The current model supports countywide mobilisation and delivery of large-scale projects, and external funding streams (including Kent Downs National Landscape bids) are described as reliant on scale across multiple sites. Cross-subsidy between parks, where income-generating sites in North Kent support less commercially strong sites in East Kent, would be disrupted if the portfolio were split across entities. Central budgets and shared resources are cited as delivering efficiency, and county-level asset renewal planning is described as enabling long-term efficiency that would be harder to replicate at smaller scale.

Interdependencies
• KCC Infrastructure and Waste for site management and landfill monitoring. • Central functions: marketing, tree inspections, procurement and funding bids. • Natural England, UNESCO Cross-Channel Geopark and Kent Downs National Landscape obligations. • Euro Car Parks, Woodland Trust, JRNI booking and ROSPA contracts.
Next Steps/ Actions
Now Map cross-subsidy flows and portfolio-level income dependencies between sites. Next Plan novation of key contracts and allocation of central budgets across new entities. Future Preserve specialist ecological expertise and the cross-park income model across designated sites.

Scope:
Countryside Partnership sits within KCC's ECE Division and delivers environmental conservation, education, health and wellbeing, and practical countryside management through a partnership-led model rather than direct ownership. It operates through seven partnerships across Kent and Bexley, working with landowners, communities, volunteers and funders to secure habitat restoration and biodiversity gain.

Does Disaggregation by default apply to this service? Yes
Why?

The service can be disaggregated. Delivery is geographically distributed through seven locally aligned partnerships, budgets are held at partnership level, staffing is decentralised with no specialist-role dependencies, and there are no system, asset or statutory lock-ins. Residual complexity from multi-organisation hosting, time-bound contracts and CMP boundaries not aligning with LGR is transitional, not a barrier.

2.3.2 Countryside Partnerships

Complexity Driver RAG Assessment					
Demand (G)		●	Delivery Model (A)		●
Budget (A)		●	Assets/ Systems (G)		●
			Staffing (G)		●
			Legislative (G)		●

Complexity Overview
What makes this service complex to disaggregate? The delivery model spans seven partnerships hosted across three sovereign organisations (KCC, Dover District Council and Medway Council), governed through MOUs, SLAs and Steering Groups, meaning reconfiguration must unpick multi-organisation hosting and accountability arrangements. Budget complexity reflects reliance on external grants, project funding and income generation, with only a small KCC contribution and significant variation between partnership areas driven by bidding success. Active contracts extending to 2027 and 2028 create time-bound obligations that constrain the pace of change and may require sequencing or novation. CMP geographies do not align with anticipated LGR boundaries, introducing a service footprint redesign consideration.
What are the potential risks of disaggregation that need to be considered? The service lead identifies loss of funding from local authorities and key partners as a primary risk, reflecting dependence on external contributions and bidding capability that could weaken under separated structures. Misalignment between existing CMP boundaries and anticipated LGR boundaries is a further risk, requiring redesign of service footprints and governance to fit successor authorities. Current hosting arrangements are flagged as a risk because responsibility, staffing and governance would need to be re-established under new structures. Disaggregation could reduce economies of scale and weaken the collective partnerships that underpin cross-boundary environmental funding bids. These are presented as consequences to be actively mitigated through phased implementation rather than as impediments to feasibility. The assessment notes that disaggregation could provide partnerships opportunities to deliver services for new unitaries and be embedded in that unitary as a key service for environmental and community delivery

Interdependencies
• Hosting spans KCC, Dover District Council and Medway Council. • Governance via partnership Steering Groups; shared capacity with Country Parks. • Time-bound grants: HLF RESTORE, Natural England GCN, Tunbridge Wells SLA. • Forestry England Bedgebury lease and partner local authority contributions.
Next Steps/ Actions
Now Map contracts against transition timelines for novation or sequencing. Next Confirm future hosting, accountability and governance for each partnership across successor authorities. Future Sustain the external funding model and cross-boundary collaboration under disaggregated structures.

Scope:
KCC's Energy and Adaptation service leads Kent's transition to a climate-resilient, energy-efficient future. It delivers projects across KCC's estate and operations and provides strategic oversight to reduce environmental impact and support statutory and corporate commitments. Operating countywide as a centralised strategic and advisory function leading Kent's climate and energy strategies.

Does Disaggregation by default apply to this service? Yes

Why?
Disaggregation is supported by default as the service can disaggregate with conditions rather than a whole-service barrier. It is discretionary with no legislative constraints on geography, and delivery is centralised but strategic and advisory rather than location-dependent. Shared systems (notably SWIMS), partnership governance and concentrated senior expertise are component-level dependencies needing shared or transitional arrangements.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.3.3 Energy & Adaptation

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in cross-organisational coordination, shared data systems and specialist expertise rather than place-based delivery. The service leads the Kent and Medway Energy and Low Emissions Strategy and the Climate Change Network, meaning delivery depends on collaborative governance across Medway, districts, boroughs and partners including the Environment Agency, NHS and blue light services, which would need active redesign under new structures. It owns and maintains the Severe Weather Impacts Monitoring System (SWIMS), a countywide, multi-agency data platform currently onboarding additional users, which does not obviously align to a geographic split. Staffing is a small team of 9 FTE and delivery relies on senior specialist knowledge and institutional memory that is sensitive to fragmentation. Budget complexity is limited but includes restricted, time-limited external grant funding (Pathways2Resilience via Climate-KIC to 16 August 2027) and internal contractual responsibilities are partially distributed across KCC, with energy management held by the team via LASER while related contracts sit within infrastructure functions.

What are the potential risks of disaggregation that need to be considered?
Climate change is a system-level issue crossing geographical boundaries, and that loss of central strategic oversight could undermine effectiveness and leave the Kent and Medway Energy and Low Emissions Strategy without clear ownership. Aggregating climate data and assets under new unitary authorities is highlighted as a challenge, including specific responsibility for data retention and ownership of SWIMS. The service also flags the risk of losing staff expertise, knowledge and contacts through Local Government Reorganisation, given the concentration of specialist capability in a small team. A further consequence identified is inefficiency if strategic services are later reaggregated through devolution, particularly relevant given the assessment's note that the service would be a contender for a Kent & Medway Strategic Authority should that pathway become available. Alongside these consequences, the assessment identifies opportunities including more focused local area energy planning, community engagement, and alignment of climate work with local skills development and clean energy jobs as a result of disaggregation.

Interdependencies

- Infrastructure functions (DCED, SKANSKA) for energy delivery and procurement.
- Owns SWIMS; cross-service climate data governance dependencies.
- ELES delivered with Medway and districts via Climate Change Network.
- LASER energy contracts and Pathways2Resilience grant to August 2027.

Next Steps/ Actions

Now
Map SWIMS data governance and specialist roles for transition planning.

Next
Decide SWIMS ownership and replacement leadership for ELES and the Climate Change Network.

Future
Sustain strategic climate coordination across Kent and Medway, retaining specialist capability.

Scope:
The Flood and Water Management service delivers KCC's statutory responsibilities as Lead Local Flood Authority, operating countywide within the ECE Division. It leads on local flood risk management, surface water drainage and sustainable drainage systems, and acts as a statutory consultee on major planning applications.

Does Disaggregation by default apply to this service? Yes
Why?

The service can be disaggregated. The Lead Local Flood Authority role applies to both county and unitary councils, with no statutory constraint on form or geography. Delivery is countywide but non-location-specific, workload allocated by capacity, budgets managed without geographic allocation, and specialist systems replicable through licensing. Workforce scale is a transitional condition, not a barrier.

2.3.4 Flood & Water Management

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Staffing is the most material complexity driver: the service is delivered by a small team of 8.6 FTE concentrating engineering, planning, sustainable drainage, environmental, water resources and project management expertise in a limited professional pool. Recruitment is constrained by competition with the private sector and geographic factors, with graduate training used to build capability over time. Delivery model complexity arises because staff are deployed flexibly across the county and allocated by capacity rather than geography, meaning smaller unitary teams could reduce responsiveness to statutory 21-day planning deadlines and flood event demand. Budget complexity reflects reliance on multi-year, project-specific external capital such as Flood Defence Grant in Aid and Southern Water partnership funding, alongside a potential commercial agreement under negotiation to 2035, which would need sequencing across new organisational boundaries. Demand is countywide with variation linked to physical geography and development patterns, and all four service areas require specialist technical input, reinforcing the workforce concentration issue.

What are the potential risks of disaggregation that need to be considered?
Splitting the team across unitary councils could reduce team sizes to levels that materially weaken preparedness for flooding and lead to loss of specialist roles such as the Water Resources Manager. Reduced coordination with Risk Management Authorities and increased public confusion over responsibilities are flagged as consequences of a fragmented model. Workforce concentration in a small specialist team means disaggregation would reduce economies of scale and resilience during major flood events. Multi-year capital funding and framework contracts (Highways Professional Service Contract Framework, Highways Framework, and the National Flood Forum agreement to 2028) would need reallocation or sequencing across successor bodies. Duplication of licensed systems - DEF/Mastergov, British Geological Survey data, Infoworks and Causeway Flow - would create additional licensing cost across authorities. An opportunity is also evidenced: closer working relationships with Environment Agency teams where unitary boundaries are geographically aligned.

Interdependencies

- Environment Agency and Internal Drainage Boards for watercourse management.
- Water companies, including Southern Water partnership funding.
- Collaborative links with Highways, Public Health and LNRS.
- Licensed systems (Mastergov, BGS, Infoworks) and 21-day planning consultee role.

Next Steps/ Actions

Now
Confirm minimum viable team size to sustain statutory LLFA functions across authorities.

Next
Decide whether specialist roles are retained in a transitional shared or countywide arrangement.

Future
Sustain specialist capability and cross-boundary flood risk management within smaller unitary teams.

Scope:
Heritage Conservation is a countywide KCC service supporting Local Planning Authorities and partners across Kent and Medway. It maintains the Historic Environment Record (HER), advises on archaeology and the built historic environment, prepares heritage policy, manages heritage assets, delivers the Portable Antiquities Scheme and Treasure process, and runs community archaeology projects.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. The RAG profile is Amber with Budget Red, reflecting complex countywide income rather than a structural block. Shared HER infrastructure, a small specialist workforce and cross-boundary contracts are renegotiable; however, alternatives to full disaggregation warrant consideration.

2.3.5 Heritage Conservation

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (R)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in shared statutory infrastructure, cross-boundary income and specialist staffing. The Historic Environment Record (a statutory dataset under LURA 2023 and the NPPF) is hosted centrally on the IDOX platform on behalf of all Kent LPAs; without a shared arrangement, each successor unitary would need to fund the software and staffing separately. Budget complexity is driven by multiple external income streams, SLAs, HER data charges and licences, Planning Performance Agreements, grants and S106 allocations, most of which are structured against a countywide footprint. Delivery is provided in-house by a small team of 12 FTE, all requiring specialist qualifications (archaeology, GIS, planning policy, architecture, artefact expertise) and deployed flexibly rather than by district. Assets and systems include open-ended contracts for HS1 archaeological archive storage at Chatham Historic Dockyard and Kent Commercial Services and eight KCC-owned windmills currently going through divestment, both of which cross unitary boundaries. While disaggregation is achievable, it requires careful sequencing of shared systems, contracts, specialist capacity and multi-year income.

What are the potential risks of disaggregation that need to be considered?

Evidence suggests that disaggregation could present challenges in maintaining a comprehensive understanding of the historic environment within individual unitary areas, given that heritage assets and archaeological evidence frequently extend across administrative boundaries. Replicating the HER across successor authorities would multiply the current annual platform cost and duplicate the specialist staffing required to maintain it. Grant income and statutory partnerships (British Museum, Historic England, NLHF, Section 106) are tied to single countywide roles, and fragmenting the team would likely require additional headcount overall while diluting specialist expertise. Multi-year external funding, notably the Lower Thames Crossing Planning Performance Agreement runs beyond the 2028 vesting date and would need reapportioning between successor bodies. The assessment also records recruitment challenges due to pay competitiveness, an ageing workforce and knowledge concentration in long-tenured staff, meaning any split risks losing accumulated expertise that is difficult to rebuild.

Interdependencies

- Kent LPAs, Medway and EDC receive advice via SLAs
- IDOX hosts the statutory HER for all Kent LPAs
- British Museum, Historic England partner on Antiquities and Treasure
- HS1 archive contracts; KCC Planning, Highways, Coroners and Infrastructure

Next Steps/ Actions

Now

Map specialist roles and succession risks and confirm HER hosting with IDOX.

Next

Resolve HS1 archive contracts, windmill divestment and LTC funding running beyond Vesting Day.

Future

Agree a sustainable HER model, whether shared or replicated, preserving specialist capacity.

Scope:
The Kent Downs National Landscape Team, hosted by KCC, operates across 878km² spanning 12 local authorities. It delivers statutory responsibilities under national legislation to prepare and implement the Management Plan for the protected landscape, alongside strategic leadership, partnership coordination, funding acquisition and project delivery to conserve landscape, biodiversity and heritage.

Does Disaggregation by default apply to this service? No

Why?
The statutory protected landscape function should remain landscape-wide because authorities must act jointly in preparing and delivering the Management Plan. Disaggregating the core duty would undermine legal compliance and coherence. The recommended model is retained shared hosting, joint governance or equivalent landscape-wide arrangement that preserves delivery across the full National Landscape geography.

2.3.7 Kent Downs National Landscape

Complexity Driver RAG Assessment					
Demand (A)		Delivery Model (R)		Staffing (R)	
Budget (R)		Assets/ Systems (A)		Legislative (R)	

Complexity Overview

What makes this service complex to disaggregate?
The dominant driver is the legislative basis: statute requires the local authorities within the National Landscape to act jointly on Management Plan preparation and delivery, embedding a cross-boundary structural dependency that persists regardless of organisational form. The delivery model reinforces this, as operations are landscape-wide, partnership-based and reliant on KCC hosting for financial management and programme coordination. Budget complexity reflects multi-source, ringfenced external funding with conditions tied to landscape-scale outcomes. Staffing (Red) is small at 17 FTE but highly specialised, and the assessment anticipates difficulty in recruiting equivalent expertise. Demand is geographically dispersed across 12 authorities with variable concentration driven by planning pressures, and Assets/Systems (Amber) rely on a hybrid IT arrangement combining KCC systems with an external provider, with document retention obligations attached to externally funded programmes and an external project office funded by Defra.

What are the potential risks of disaggregation that need to be considered?
Evidence suggests risks of differing local geographic approaches undermining strategic Kent Downs-wide delivery, and of inconsistent strategic direction if no county-level structure is retained. Fragmenting responsibility across successor bodies risks reduced organisational priority within new authorities, where the landscape would compete with wider statutory responsibilities, and loss of established relationships across the Joint Advisory Committee, statutory agencies and delivery partners. The hosting arrangement is central to legal identity, cash flow management and funding eligibility, and the assessment flags a specific risk relating to geographic alignment of any replacement host. External funding compliance is a further transitional consequence, given Defra and Section 106 arrangements are tied to defined outcomes and delivery geography. There is an opportunity to engage with new authorities to strengthen statutory awareness, broaden representation within the Joint Advisory Committee, and enhance funding and impact through renewed engagement.

Interdependencies

- KCC hosting underpins legal identity, finance, ICT and funding eligibility.
- Joint statutory responsibility across the 12 authorities in the landscape.
- Partnerships with Natural England, Historic England and Forestry Commission.
- Ringfenced Defra, Section 106 and National Lottery Heritage funding.

Next Steps/ Actions

Now
Map statutory duties against components eligible for disaggregation and clarify funding conditions.

Next
Agree a joint governance structure and successor hosting for legal identity and finance.

Future
Sustain landscape-wide delivery, specialist capability and ringfenced funding under new structures.

Scope:
KCC's Natural Environment and Coast service protects, enhances and restores Kent's natural environment and coastline through two components: the Ecological Advice Service and Local Nature Recovery. EAS provides ecological advice on planning, Biodiversity Net Gain and mitigation; LNR delivers the statutory Local Nature Recovery Strategy under the Environment Act 2021.

Does Disaggregation by default apply to this service? Part

Why?
Local Nature Recovery should remain countywide because KCC is the statutory responsible authority for the Kent and Medway geography, and the function depends on strategic consistency. A shared service or joint governance model best protects statutory delivery, while ecological advice elements could be localised through carefully managed SLA arrangements.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.3.6 Natural Environment and Coast

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview
What makes this service complex to disaggregate? Legislative basis is the most material complexity driver: LNR's statutory designation under the Environment Act 2021 ties delivery to a defined countywide geography (Area 40, Kent and Medway) and a single responsible authority, making a clean split difficult without a shared or strategic arrangement. Delivery is countywide and non-geographic, relying on flexible deployment, role-based teams (urban, rural, trees, coast and marine) and shared expertise rather than area-based patches, so splitting the service risks losing coordination and pooled capacity. Staffing complexity reinforces this: a small workforce holds specialist knowledge of Biodiversity Net Gain and planning ecology, with known recruitment challenges for experienced specialists and reliance on graduate pipelines and consultants. Budget complexity reflects two funding models - LPA-usage-based SLAs for EAS and DEFRA/external grants for LNR, with grant duration and continuity not stated, creating uncertainty over post-reorganisation sustainability. Demand is uneven across LPAs (from 230 to 4,127 EAS responses) and growing due to Biodiversity Net Gain, adding a workload-distribution consideration under any disaggregated model. What are the potential risks of disaggregation that need to be considered? The assessment identifies potential dilution of shared knowledge and inconsistency of ecological planning advice as a primary risk if EAS is split across successor authorities. It also notes that future resourcing approaches within unitary councils could influence the service's capacity to respond to application volumes associated with Biodiversity Net Gain. In addition, local decisions about future service provision could lead to different operating models across areas, with implications for how environmental protection functions are delivered. For LNR, the assessment states that the service cannot be sufficiently disaggregated to deliver statutory intent, and that absence of a strategic authority would require a shared service arrangement - the consequence being fragmentation of strategic oversight and the need to replicate or coordinate statutory reporting and delivery. The assessment also highlights the service's reliance on grant funding and notes that future funding continuity would need to be clarified as part of any transition arrangements.

Interdependencies
- EAS contractually linked to Kent LPAs via annual SLAs. - LNR links with Flood & Water, planning and highways. - Natural England, Forestry England and Environment Agency partnerships. - DEFRA grant funds LNRS delivery; Arc GIS Pro dependency.
Next Steps/ Actions
Now Clarify Environment Act flexibility for Area 40 and map DEFRA grant transferability. Next Decide whether LNR follows shared service, joint governance or Strategic Authority route. Future Preserve countywide LNR oversight and consistent ecological advice across successor authorities.



Table of Contents – GET – Growth and Communities

2 GET

2.4 Growth and Communities

2.4.1 Innovation and Business Intelligence

2.4.2 Planning Applications and Minerals & Waste Planning

Scope:
The Innovation and Business Intelligence Group (IBI) delivers division-wide service improvement, innovation and support across five functions: Intelligence & Data (Kent Intelligence Service), Communications, Digital Systems, Business Innovation and Business Support. It supports statutory services, notably Trading Standards, leading GET-wide prevention initiatives.

Does Disaggregation by default apply to this service? Part

Why
The Intelligence and Data function should remain countywide because it relies on scarce criminal intelligence expertise, restricted systems and cross-boundary enforcement coordination. Disaggregation would weaken public protection and dependent services. A countywide shared service is the strongest recommendation while successor authorities build any longer-term in-house capability.

2.4.1 Innovation and Business Intelligence

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity and risk is concentrated in the Intelligence & Data function and, to a lesser extent, the Trading Standards Checked scheme. Staffing is Amber because six FTE Criminal Intelligence Managers and Analysts, four Specialist Communications roles and the single Trading Standards Checked Scheme Manager require specialist training, NPPV Level 2/3 vetting or SC clearance, and would be difficult to recruit and replicate at unitary scale. The delivery model is Amber because lawful access to restricted intelligence systems derives from Trading Standards’ statutory enforcement powers, creating a fixed interdependency between Intelligence & Data, Communications and Trading Standards. Assets/Systems is Amber because expensive specialist licences (i2 iBase, Analyst Notebook, ESRI ArcGIS Pro, GBG, TransUnion, Locta, NAFN) and the bespoke Trading Standards Checked web system would be costly to duplicate or redesign. Legislative complexity is Amber because, although IBI is not statutory in its own right, other KCC services rely on it to meet statutory obligations under the Local Government Act 1999 and to support safeguarding referrals and criminal-activity detection. What are the potential risks of disaggregation that need to be considered? Fragmentation of scarce expertise is the principal risk, breaking an operating model in which subject-matter experts work as one team to drive continuous improvement. The greatest operational exposure sits in Intelligence & Data and Communications, with direct consequences for Trading Standards and for KCC’s lead role in tackling serious organised waste crime; disaggregation could disrupt intelligence flows, reduce analytical capacity and break the alignment between intelligence, communication and enforcement. Core intelligence systems may need to be duplicated across new unitaries, adding cost, and the Trading Standards Checked scheme could also be difficult to disaggregate due to low FTE for this function. There are two structural scenarios which both raise concerns: a centralised model creates prioritisation, governance and capacity pressures from multiple authorities, while a disaggregated model risks capability gaps because fragmented teams may lack the specialist capacity to meet unitary-level demand. Roles that are difficult to recruit, particularly intelligence staff, heighten the risk of service disruption to Trading Standards and the Kent Resource Partnership during transition.

Interdependencies
- Trading Standards enables lawful restricted intelligence-system access - Adult Social Care and Public Health safeguarding referrals - Intelligence partners: Kent Police, Environment Agency, National Crime Agency - Suppliers Civica, IDOX, Red Bullet; Kent Resource Partnership
Next Steps/ Actions
Now Novate or terminate Civica, IDOX, Red Bullet and Kent Resource Partnership contracts. Next Confirm whether Intelligence & Data remains a shared service or rebuilt per unitary. Future Design corporate support giving unitaries data, intelligence and communications capability.

Scope:
The Planning Applications Group and Minerals & Waste Local Plan service delivers KCC's statutory planning role. It determines planning applications, pre-application advice, monitoring and enforcement, and prepares and maintains the Kent Minerals and Waste Local Plan with annual monitoring. It also serves Ebbsfleet Development Corporation under a Service Level Agreement (SLA).

Does Disaggregation by default apply to this service? Yes

Why?
Disaggregation would be complex but is achievable. Delivery is countywide, in-house and flexibly deployed, with no area-based budget and centrally held records. Variable demand, uncertain fee income and the statutory minerals and waste designation are surmountable; staffing is a significant resourcing challenge for successors, but not a structural barrier.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.4.2 Planning Applications and Minerals & Waste Planning

Complexity Driver RAG Assessment					
Demand (A)		●	Delivery Model (G)		●
Staffing (R)		●	Assets/ Systems (G)		●
Budget (A)		●	Legislative (A)		●

Complexity Overview

What makes this service complex to disaggregate?

The most material complexity is staffing . The team is already under capacity; an ageing profile, national planner shortages (particularly in minerals and waste), and reliance on agency and consultancy support compound sustainability risk during LGR. Demand is variable, unpredictable, and driven by external development proposals, with cross-boundary flows (Allington waste-to-energy, Ashford soft sand serving Kent and East/West Sussex, and the EDC SLA) that need careful handling if functions are split across successor unitaries. Budget complexity arises from fee-dependent, uncertain income (planning fee income target of –£285k) and the challenge of allocating a countywide budget and income base across multiple new authorities. Legislative complexity centres on the Town and Country Planning Act 1990 designation of Kent as the minerals and waste planning authority, which is not automatic on unitarisation, though precedent points to legislative updates enabling redesignation.

What are the potential risks of disaggregation that need to be considered?

Resource and specialist expertise cannot be split without creating delivery gaps, given the qualified, senior weighting of the team and the existing capacity shortfall. Splitting minerals and waste plan-making across successor unitaries risks delays and abortive work, and the loss of strategic coherence and specialist expertise given the cross-boundary nature of minerals resources and waste catchments. There are continuity risks around contracts, procurement, IT systems and data, alongside workforce resilience and retention pressures during LGR, which could accelerate departures from an already stretched team. The Ebbsfleet Development Corporation SLA is a specific consequence to work through, alongside allocation of variable fee income across new bodies.

Interdependencies

- Innovation & Business Intelligence and corporate support functions
- Specialist biodiversity, highways and flood defence advisory teams
- Ebbsfleet Development Corporation SLA; districts and statutory consultees
- Mastergov, Arcadis, Jacobs, AECOM and BPP contracts

Next Steps/ Actions

Now

Map contract and system expiries and plan workforce retention against vacancies.

Next

Confirm Ebbsfleet SLA position and successor minerals and waste planning designation.

Future

Sustain specialist capacity and strategic coherence for minerals and waste planning.

Table of Contents – GET – Growth and Communities: Community Protection

2 GET

2.5 Growth and Communities: Community Protection

2.5.1 Community Safety, including Community Wardens

2.5.2 Community Safety - Domestic Homicide Review Function

2.5.3 Coroners Service

2.5.4 Kent Scientific Services

2.5.5 Trading Standards

Scope:
KCC's Community Safety service works to create safer, more resilient communities across Kent. It leads countywide multi-agency activity through the Kent Community Safety Partnership, delivering statutory Community Safety Partnership duties alongside preventative work on crime and anti-social behaviour. It comprises the Kent Community Safety Team and Kent Community Warden Service.

Does Disaggregation by default apply to this service? Yes

Why?

The service can be disaggregated, with transitional shared arrangements a possible route for governance and partnership coordination, systems and data management, and contracts and funding. Strategic functions could be replicated or redesigned locally, with trade-offs in cost and efficiency.

2.4.1 Community Safety, including Community Wardens

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is driven by the hybrid delivery model, where countywide statutory partnership governance sits alongside area-based frontline delivery, with both underpinned by centralised systems, standards, and supervision. Specialist expertise (including analytical capability and senior partnership roles) is concentrated in a small number of posts supporting countywide activity, meaning workforce capability is not evenly modularised by area. The KCWS case management system is explicitly designed for cross-district access, safeguarding continuity, and shared corporate memory, and licensing and contractual arrangements are optimised at county level. Budgets are largely managed on a countywide, pooled basis, and the Memorandum of Understanding with Kent Police to March 2028 (including pooled budget, shared staffing, and joint governance) creates a transitional constraint that would need to be reviewed and potentially restructured, with timing implications for how and when full disaggregation can take place. Community safety legislation in a two-tier area requires countywide coordination and a county-level Community Safety Agreement, embedding statutory considerations across the service rather than isolating them to one function.

What are the potential risks of disaggregation that need to be considered?

Fragmentation of countywide governance and assurance, loss of economies of scale and specialist capacity, and greater complexity for partners are the principal risks of disaggregation. Data and performance inconsistency, loss or dilution of community-based resources, and difficulty mobilising frontline resources across boundaries are also directly identified, alongside the risk of losing staff and expertise. Moving from pooled financial risk and flexibility to local budget ownership carries consequences for viability and risk-sharing, particularly given KCWS's exposure to sponsorship income and existing MTFP commitments. The assessment also identifies opportunities - closer alignment to local need if designed well, redesign and standardisation of processes, more resident-focused frontline services, and reaffirmation of shared countywide infrastructure, which frame the consequences to be managed rather than avoided.

Interdependencies

- Internal links: Adult Social Care, Children's Services and Public Health.
- KCWS centralised Power Apps case management system, cross-district.
- Kent Police MOU to March 2028, with pooled budget.
- Identicom, fleet leasing contracts and KCWS sponsorship funding.

Next Steps/ Actions

Now

Map partnership dependencies against new boundaries and clarify Kent Police MOU position.

Next

Decide phased sequencing across governance, systems, contracts and workforce, and KCWS system treatment.

Future

Consider statutory countywide coordination, safeguarding continuity and specialist analytical capacity across authorities.

Scope:
Kent County Council's Community Safety Team delivers statutory Domestic Homicide Reviews, transitioning to Domestic Abuse Related Death Reviews, for the Kent and Medway Community Safety Partnerships. It conducts formal, regulated reviews of domestic abuse-related deaths, providing independent oversight, safeguarding learning and statutory compliance.

Does Disaggregation by default apply to this service? No

Why?

Domestic Homicide Reviews and Domestic Abuse Related Death Reviews should remain countywide because they rely on centralised governance, specialist expertise and flexible resourcing to manage unpredictable demand. A countywide or shared-service model best preserves independence, consistency and safeguarding effectiveness across Kent and Medway.

2.4.2 Domestic Homicide Review Function

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in the four Red-rated drivers of Demand, Delivery Model, Staffing and Legislative Basis, supported by Amber-rated Budget. Demand is unpredictable, non-geographically aligned and volatile, driven by case occurrence rather than population, requiring responsive capacity that would be difficult to distribute across fixed local footprints. Delivery is a fully centralised, countywide (Kent and Medway) function coordinated through the DHR sub-group of the Kent Community Safety Partnership, with commissioned independent chairs (annual contracts, maximum 3 years) and specialist support contracts. Staffing is not held within a dedicated team but is embedded within the wider Kent Community Safety Team (KCST, 9 FTE total with 5 senior roles) and flexed to demand, and specialist review expertise is described as nationally scarce. Budget is jointly funded with Statutory Responsible Authorities (an estimated £92k staffing and £60k non-staffing in 2026/27, with drawdown from reserves), managed countywide. The statutory Section 9 duty and forthcoming DARDR transition under the Victims and Prisoners Act 2024 will further increase process and capacity requirements.

What are the potential risks of disaggregation that need to be considered?

The service lead identifies the most decision-relevant consequences as loss of specialist DHR/DARDR expertise and capacity, reduced resilience to fluctuating and unpredictable caseloads, and increased risk of delays or reduced quality in statutory processes. Independence, a core requirement of the review function, is currently operationalised through central commissioning of independent chairs and multi-agency governance and would be more difficult to sustain if replicated across successor authorities. The assessment also flags that pooled funding arrangements with statutory partners and cross-boundary partnership working with Kent Police, NHS/ICBs, Probation, prisons, districts and the voluntary sector would need to be restructured, and that the forthcoming Victims and Prisoners Act 2024 transition to DARDRs is expected to increase demand and process requirements.

Interdependencies

- Embedded within Kent Community Safety Team (9 FTE).
- Multi-agency DHR sub-group governs the centralised model.
- Commissioned independent chairs and specialist support contracts.
- Statutory Section 9 duty; forthcoming DARDR transition.

Next Steps/ Actions

Now

Map embedded KCST staff and plan continuation of independent chair contracts.

Next

Confirm countywide retention, pooled funding and accountability for Section 9 and DARDR duties.

Future

Design a resilient countywide model preserving independence and nationally scarce specialist expertise.

Scope:
The Coroners Service delivers KCC's statutory responsibilities under the Coroners and Justice Act 2009, supporting Senior Coroners for Kent and Medway to investigate deaths lawfully and independently. Following a July 2025 merger it operates as one countywide in-house jurisdiction, also serving Medway Council.

Does Disaggregation by default apply to this service? No
Why?

Coroner Services should remain a single Kent and Medway jurisdiction because the current model is legally constituted, operationally integrated and dependent on shared workforce, estate and commissioning. Reversal would require legislative change and create continuity risk. The recommended pathway is to retain the unified jurisdiction and shared service.

2.4.3 Coroners Service

Complexity Driver RAG Assessment					
Demand (R)		●	Delivery Model (A)		●
Staffing (R)		●	Budget (A)		●
Assets/ Systems (A)		●	Legislative (R)		●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in three Red-rated drivers - Legislative, Demand and Staffing, with material reinforcement from three Amber drivers. The legislative position is the defining constraint: the current single jurisdiction is the intended statutory configuration under the Coroners and Justice Act 2009 and cannot be divided without further legislation. Demand is geographically unpredictable and spans complex case types (including deaths in custody, Mental Health Act cases, clinical care, road traffic fatalities and safeguarding), requiring real-time deployment of pooled capacity that is not aligned to discrete geographic units. Staffing complexity arises from reliance on specialist, regulated roles, including coroners who are qualified barristers with 10+ years' experience, combined with sustained vacancies in Coroners Investigation Officer posts for over three years. Delivery model, budget and assets and systems reinforce this picture through centralised commissioning of countywide contracts, a countywide budget exposed to unpredictable case-level costs, and centralised court and mortuary infrastructure at Oakwood House with integrated digital and audio-visual systems configured for shared use.

What are the potential risks of disaggregation that need to be considered?

The service lead identifies clear consequences of disaggregation: it would require legislative change to reverse the 2025 Statutory Instrument and approval from the Chief Coroner, Ministry of Justice and Lord Chancellor. The assessment also evidences a potential increase in service cost, reduced efficiency and effectiveness, and reduced service standards for residents. Beyond these direct risks, the Strategy and Policy assessment indicates that separation would remove the flexibility provided by pooled capacity to absorb fluctuating demand and complex casework and would require reconstruction of core delivery mechanisms rather than reconfiguration of discrete functions. Contract and partnership restructuring across pathology, mortuary, toxicology and funeral director arrangements would follow, alongside redistribution of inherently unpredictable case-level costs currently pooled countywide. The existing statutory delivery arrangement with Medway would need to be reviewed and replaced to reflect the new local government structures, with potential implications for continuity, coordination and resilience across the jurisdiction.

Interdependencies

- Statutory Medway delivery arrangement with funding recovery mechanism
- Centralised pathology, mortuary, toxicology and funeral director contracts
- Shared Oakwood House estate and five digital courts
- Multi-agency coordination with police, NHS and SECAMB

Next Steps/ Actions

Now

Map the statutory approval route via Chief Coroner, Ministry of Justice and Lord Chancellor.

Next

Clarify future shared delivery and funding recovery arrangements with successor authorities.

Future

Formalise governance and legislation sustaining the unified countywide coronial service.

Scope:
Kent Scientific Services delivers analytical, scientific and regulatory services supporting public protection, compliance and enforcement. It fulfils the statutory Public Analyst and Agricultural Analyst functions, acts as Local Weights & Measures Authority, and provides analytical, calibration and toxicology services to Trading Standards, councils, port health authorities and industry.

Does Disaggregation by default apply to this service? No

Why
Kent Scientific Services should remain a single countywide service because its accredited laboratory, scarce Public Analyst roles and statutory support functions cannot be viably replicated locally. Disaggregation would threaten scale, financial sustainability and continuity for dependent services. The recommended model is continued countywide provision for successor authorities.

2.4.4 Kent Scientific Services

Complexity Driver RAG Assessment					
Demand (A)			Delivery Model (R)		
Staffing (R)			Budget (G)		
Assets/ Systems (R)			Legislative (G)		

Complexity Overview

What makes this service complex to disaggregate?
The service is delivered from a single accredited laboratory that cannot readily be replicated across successor authorities, with no other similar facilities existing in Kent and total scientific instrument value of approximately £1.2m. Staffing complexity is driven by the statutory Public Analyst role, which requires the MChemA qualification and draws from a national pool of only 18 practitioners. Delivery relies on a formal partnership with Hampshire County Council for nationwide client work, adding a further layer of shared governance that would be difficult to unwind. Demand is specialised rather than geographically distributed within Kent, meaning splitting activity by area would not align with how the service is used. Together, these Red-rated drivers make the service structurally difficult to disaggregate into multiple new unitaries.

What are the potential risks of disaggregation that need to be considered?
Disaggregation would create serious challenges around setting up multiple accredited laboratories, each requiring UKAS ISO 17025 accreditation, with associated capital costs and loss of scale. Statutory dependencies across the Kent & Medway Coroner Service, Trading Standards functions, and Port Health Authorities could face continuity risks given there are no viable alternative providers. The national shortage of Public Analysts is a further constraint, with recruitment challenges potentially insurmountable across multiple successor bodies. The overall consequence is potential loss of operational continuity and financial viability for the service and knock-on impacts on the statutory functions it supports.

Interdependencies

- Coroner Service toxicology of post-mortem samples
- Trading Standards food, product testing and metrology calibration
- Hampshire County Council partnership serving national clients
- LIMS supplier Analytical Information Systems; district environmental health

Next Steps/ Actions

Now
Safeguard statutory coroner toxicology and Trading Standards dependencies during transition.

Next
Progress the Public Analyst training pipeline and clarify the Hampshire partnership.

Future
Sustain laboratory accreditation, scale and national income under any future governance.

Scope:
Trading Standards is a predominantly statutory, countywide service enforcing over 250 Acts and Regulations across consumer protection, product safety, fair trading, food standards, animal health, feed, weights and measures, petroleum and explosives licensing, and safeguarding of vulnerable consumers, including a nationally significant ports and borders function at Dover.

Does Disaggregation by default apply to this service? Yes

Why
Trading Standards is capable of disaggregation into new unitaries, providing significant preparatory work in resourcing and remodelling the team for geographically based delivery. No legislative restriction on geographic delivery applies, and there is potential for the existing multi-disciplinary workforce to be trained and redeployed across multiple aspects of the service, at least in the short term. Some functions - Kent Scientific Services metrology, intelligence-led investigations and in-house Legal - may need shared or partnership arrangements short to medium term.

2.4.5 Trading Standards

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in one Red-rated and three Amber-rated drivers. Staffing is the most material: over 50% of qualified officers are expected to reach retirement age within five years, and specialist roles sit at very low FTE counts (Petroleum 0.9 FTE, Explosives 0.9 FTE, Accredited Financial Investigators 2 FTE), creating a single point of failure risk if split across multiple unitaries. Delivery Model is currently thematic and centralised with flexible countywide deployment, and there are critical interdependencies with Kent Scientific Services, the Intelligence and Data function and the in-house Legal team that must be resolved before vesting. Assets/Systems complexity centres on the metrology laboratory and specialist equipment at Kent Scientific Services in West Malling, which would be difficult or impossible to replicate, with no viable commercial alternative in Kent, alongside licensing implications for the IDOX case management system and national intelligence platforms. Demand is broadly even countywide but includes distinct hotspots at the Dover ports, Ashford rural/livestock market and urban consumer centres, with the breadth of 250+ Acts requiring specialist responses that are harder to sustain within smaller footprints. What are the potential risks of disaggregation that need to be considered? Loss of economies of scale, leading to higher costs for IT systems, training and specialist roles across multiple new authorities. Statutory competencies may be harder to maintain consistently across smaller services, particularly in feed enforcement, metrology and financial investigations, with the possibility that some authorities are left without an accredited financial investigator capability. Service disruption during transition includes IT system migration, legal authorisations, case handovers, and a potential impact on ongoing legal cases. There could be consequences specific to Kent's strategic border role such as a loss of the single cohesive intelligence picture across Kent entry points which could weaken partner-agency confidence and increase scrutiny of border controls at Kent's entry points. Public Health co-funded roles, currently single officer posts for the county, may not be replicable across multiple authorities within existing budgets.

Interdependencies
• Kent Scientific Services metrology and calibration capability • In-house Legal team and Data/Intelligence function for prosecutions • Partners: Border Force, HMRC, FSA, DEFRA, National Trading Standards • Per-authority IDOX, ALTIA and national intelligence platform licensing
Next Steps/ Actions
Now Secure access to Kent Scientific Services laboratory and protect ongoing cross-border investigations. Next Decide successor approach to legal, intelligence and single-point-of-failure specialist roles. Future Sustain statutory coverage and the Dover ports and borders function.

Table of Contents – GET – Growth and Communities: Economy

Kent County Council – Divisional Groupings · click any entry to open its slide

2 GET

2.6 Growth and Communities: Economy

2.6.1 Business Investment

2.6.2 Economic Strategy, Partnerships & Programmes

2.6.3 Grow in Kent (Visit Kent and Invest Kent)

2.6.4 No Use Empty

2.6.5 Skills and Employment

2.6.6 Village Halls and Old Rectory

Return to table of
contents

Scope:
Business Investment delivers direct and commissioned business support across Kent and Medway through two schemes. The Kent & Medway Business Fund (KMBF) provides investment finance to start-up and established businesses evidencing growth, productivity and job creation. The Kent & Medway Growth Hub offers advice, mentoring, workshops and funding signposting.

Does Disaggregation by default apply to this service? Part

Why?
The Growth Hub is contracted to operate across the Kent & Medway Functional Economic Area (FEA), as Government policy requires economic strategy and collaboration between councils to be delivered at the FEA level. The recommended model for the Growth Hub is therefore continued countywide delivery, whereas the Kent and Medway Business Fund could be disaggregated to successor authorities, with careful transition of staffing requirements, financial models and contracts.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.6.1 Business Investment

Complexity Driver RAG Assessment					
Demand (G)		●	Delivery Model (G)		●
Staffing (G)		●	Budget (A)		●
Assets/ Systems (G)		●	Legislative (R)		●

Complexity Overview		Interdependencies	
What makes this service complex to disaggregate? The most material complexity is the Legislative position (Red). Although the service is discretionary, the Growth Hub is funded by the Department for Business and Trade to operate across the Kent & Medway Functional Economic Area, and government policy requires councils to cooperate on economic strategy at the FEA level through the Kent & Medway Economic Partnership and the Kent & Medway Economic Framework to 2030. Budget complexity (Amber) is a further consideration: KMBF is revenue-generating through administration and management fees, whereas the Growth Hub is sustained by a ring-fenced DBT grant, and the two funding models would need to be reconciled or reallocated on disaggregation. The staffing footprint is small (8 FTE), which could be difficult to split across multiple new unitaries in its current form even though the roles are not highly specialist. Live contracts, including the KMBF due diligence re-procurement and the Growth Hub contracts running to 2028 and 2029, would also need to be managed through transition.		• DBT funds Growth Hub grant and receives reporting. • Medway Council holds Growth Hub accountable-body agreement. • KMEP and KMEF anchor Functional Economic Area strategy. • Active KMBF and Growth Hub contracts to 2028/2029.	
Next Steps/ Actions		Now Manage live Growth Hub and KMBF contracts, including active KMBF re-procurement. Next Confirm countywide Growth Hub, accountable-body arrangement and KMBF income and grant allocation. Future Align with the Economic Framework to 2030 and prepare for a Strategic Authority.	

Scope:
The Economic Programmes and Strategies service provides strategic leadership for economic growth across the Kent and Medway Functional Economic Area, delivered in-house by a small senior team. It develops the Local Growth Plan, Economic Framework and related strategies, and convenes partnerships including KMEP.

Does Disaggregation by default apply to this service? Part

Why?
Economic Programmes and Strategies should remain countywide because economic strategy, partnership governance and funding obligations operate at a Kent and Medway Functional Economic Area scale. The recommended model is continued countywide delivery. The element of the service which could be disaggregated is the Business Advisory Board (BAB subject to further discussion and consultation.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.6.2 Economic Strategy, Partnerships & Programmes

Covering: KMEP, KMEF/ Local Growth Plan, Kent Ambassadors

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview
What makes this service complex to disaggregate? The most material complexity arises from the legislative basis and staffing (both Red), supported by the delivery model (Amber). Government direction requires Kent and Medway councils to cooperate on combined economic strategies at a Functional Economic Area scale, including the Local Growth Plan and the Get Kent and Medway Working Plan, which constrains how the strategic function can be split. The 6.5 FTE team holds deep subject-matter knowledge and could not replicate its current functions across multiple unitaries without additional recruitment or reduced capacity. The delivery model relies on coordinating multiple formal partnerships – Kent and Medway Economic Partnership, Business Advisory Board, Kent and Medway Innovation Partnership, Strategic Partnership for Health and Economy, and sector networks - each with distinct memberships and purposes, which would fragment under a split. The BAB was identified as the component most capable of being disaggregated, as it represents a discrete part of the wider economic strategy function, subject to further engagement and consultation with local businesses. What are the potential risks of disaggregation that need to be considered? Disaggregation would run counter to government expectations that economic strategy is delivered at functional economic area scale and would make it harder to maintain strategic coordination across Kent and Medway. It risks fragmenting the partnership and governance structures the service currently coordinates and complicates management of shared funding and programmes - including residual SELEP allocations and the Growing Places Fund - across multiple successor authorities. Inconsistent priorities across new unitaries could dilute the coherence of the current combined approach. Hosting arrangements for any shared service would themselves need to be resolved, adding complexity to the transition. The service also sits within a wider positioning consequence: economic development and regeneration is identified as one of the competencies that would sit under a Kent and Medway Strategic Authority if that pathway becomes available, and disaggregation could hinder the initial capacity of such an authority to deliver economic strategy.

Interdependencies
- Economy teams, CYPE skills, ASC and Public Health - Transport, infrastructure planning, energy and flood management teams - MHCLG and DWP setting FEA delivery expectations - Get Kent and Medway Working Plan co-owners; Data City licence
Next Steps/ Actions
Now Map interdependencies and clarify treatment of residual SELEP and Growing Places funding. Next Agree hosting and governance for a single FEA-scale function post-LGR. Future Position for absorption into a Kent & Medway Strategic Authority, if established.

Scope:
Grow in Kent is Kent's place-based growth brand, combining Visit Kent (visitor economy promotion) and Invest Kent (inward investment and business expansion). It promotes Kent as a place to live, work, invest and visit through place marketing, business intelligence, operating countywide across the Kent & Medway Functional Economic Area.

Does Disaggregation by default apply to this service? No

Why?

Visit Kent and Invest Kent should remain countywide because economic growth, investment promotion and the Kent brand operate most effectively at Kent and Medway Functional Economic Area scale. A continued countywide arrangement best preserves strategic coherence and positions the service for future absorption into a Strategic Authority.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.6.3 Grow in Kent (Visit Kent and Invest Kent)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview
What makes this service complex to disaggregate? The primary driver is legislative and policy direction (Red): Government policy requires an economic growth strategy to be delivered at the Kent & Medway Functional Economic Area (KMFEA) level and designates economic growth as a Strategic Authority competency. The delivery model (Amber) is countywide across the KMFEA and effectively run on a partnership basis with Medway Council, with the 'Kent' (Garden of England) brand at the heart of the service - attributes that would be undermined by splitting delivery. Budget complexity (Amber) arises because funding pools KCC and Medway Council core contributions with variable partner income, all allocated countywide rather than by area. Staffing (Amber) is a small 6 FTE team, all at senior grade, with sector-specific knowledge, established networks and relationship-based roles that would lose critical mass if fragmented. Demand (Amber) is dispersed across Kent and Medway and includes specialist support for inward investment, high-growth sectors and internationally focused visitor economy activity, which does not align to a locality-based footprint. What are the potential risks of disaggregation that need to be considered? Fragmentation of a small, specialist service operating at a countywide functional economic geography as a central risk, with likely duplication of effort, loss of critical mass and reduced effectiveness in inward investment, destination marketing and external promotion. Workforce resilience would be affected, with specialist roles, recruitment and retention challenges, and dilution of expertise across successor authorities. Duplication of systems, platforms and licences would increase costs, fragment data and reduce consistency of external messaging. Alignment with national policy expectations around strategic economic growth leadership would be weakened. Because the recommended pathway is a continued countywide arrangement with the potential for the service to be absorbed into a future Kent & Medway Strategic Authority, the practical consequence of disaggregation would be to move against that direction and reduce the ability to promote 'Kent' as a single brand nationally and internationally.

Interdependencies
• Sits within KCC Economy division and growth activities • Centralised KCC finance, procurement, communications and legal support • Partnership with Medway Council via joint funding • Third-party Visit/Invest Kent websites, CRM and marketing platforms
Next Steps/ Actions
Now Plan the 6 FTE transition to preserve relationships, knowledge and live projects. Next Confirm countywide arrangement, governance and treatment of pooled KCC, Medway and partner funding. Future Design for absorption into a future Kent & Medway Strategic Authority.

Scope:
Launched in East Kent in 2005 and operating countywide since 2008, No Use Empty returns long-term empty residential and commercial properties to use through short-term, secured, recyclable loans. It supports owners, landlords and developers across all 12 Kent districts. Since 2020, NUE has also offered first charge, short-term, interest-bearing loans to developers of derelict or vacant sites, primarily to enable the creation of new homes in Kent and to support the development of new business units.

Does disaggregation by default apply to this service? Yes

Why?

NUE is a discretionary service delivered by a small, centrally managed 3 FTE team; each new unitary will decide whether to offer it. Although demand concentrates in East Kent and district capability varies, the low staffing requirement and efficiencies from aggregating district housing teams mean successors could recruit or upskill officers.

2.6.4 No Use Empty

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is unevenly distributed, with East Kent districts accounting for 79% of total NUE investment to date, and project complexity varies across residential refurbishment, commercial conversion and new-build schemes with legal, planning, insurance and lender-consent requirements. The delivery model relies on a very small centralised KCC team with close operational interdependencies with districts Private Sector Housing, Planning and Building Control teams, whose capacity varies by geography. Budget complexity arises from pooled income generation, recyclable capital, Treasury Investment Funds requiring a 4% return, and administration of Top Up Funds held on behalf of Dover, Folkestone & Hythe and Tunbridge Wells. Staffing is highly specialised and cannot be readily split across multiple new unitaries, and the team also provides back-office support to Southend-on-Sea and Thanet, with Medway indicating potential re-engagement in 2026/27.
What are the potential risks of disaggregation that need to be considered? NUE was created to provide a coordinated countywide approach in place of separate district-level arrangements, and disaggregation risks reintroducing the fragmentation it was designed to address. Risks include loss of the integrated delivery model combining finance, enforcement knowledge, communications and legal expertise, dilution of specialist expertise and institutional memory, and increased inequality of outcomes between districts with differing capacity. There is financial and governance risk from fragmented loan management, and brand and reputation dilution that could reduce leverage with property owners. Any future pathway will need to reflect the pooled nature of NUE capital, Treasury Investment Funds and district-owned Top Up Funds, and the position of loans already issued under KCC's name. Opportunities include clearer accountability and role definition, greater local flexibility, and improved workforce resilience where knowledge transfer is well managed.

Interdependencies
- Districts' housing, revenues, planning and building control teams - KCC Legal, Finance, Regeneration and Communications support - Bevan Brittan LLP outsourced legal services, invoiced per loan - Back-office for Southend-on-Sea and Thanet; district Top Up Funds
Next Steps/ Actions
Now Map district housing capacity and clarify Bevan Brittan legal contract position. Next Decide whether NUE continues as shared, dedicated East, or ceases. Future Confirm governance of pooled capital, Treasury and district Top Up Funds.



Scope:
Skills and Employability coordinates activity across Kent and Medway to improve skills, align labour supply with employer demand. It delivers two DWP-funded programmes: Connect to Work, a supported employment programme for people with complex needs; and Skills Bootcamps for residents aged 19+, both operating at Functional Economic Area scale.

Does Disaggregation by default apply to this service? No

Why?
Skills and Employability should remain under one Accountable Body because DWP requires Kent and Medway Functional Economic Area delivery for Connect to Work and Skills Bootcamps. Fragmentation would risk grant funding, contracts and specialist capacity. A countywide arrangement is the strongest route pending any future Strategic Authority.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.6.5 Skills and Employability

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview
What makes this service complex to disaggregate? The dominant complexity driver is Legislative (Red): Government has mandated delivery across the Kent & Medway FEA, DWP requires a single Accountable Body representing all councils in the area, and Skills and Employment Support is designated as a competency for future Strategic Authorities. Delivery Model complexity (Amber) reinforces this, as the programmes depend on interlocking DWP grant agreements and four external delivery contracts (The Education People, Shaw Trust, The Forward Trust and Aptem CRM) running to 2028 with two-year extension options, alongside operational interdependencies with Medway Council. Budget complexity (Amber) is inseparable from these constraints, since 100% DWP funding is allocated to KCC as Accountable Body for the FEA. Demand complexity (Amber) arises because Connect to Work participants typically present multiple complex needs (including disability, mental health, care experience and justice history) with higher unemployment concentrated in coastal areas, though delivery is already segmented into four geographic lots. Staffing complexity (Amber) reflects a small combined team of 7 FTE at senior grades with sector-specific expertise that could not practically be split across multiple new unitaries without recruitment or reduced capacity. What are the potential risks of disaggregation that need to be considered? Loss of central-team consistency is the main risk: both programmes rely on a small in-house team's ability to support Delivery Partners across the entire Kent and Medway area, and splitting this capability would reduce capacity and require successor authorities to recruit specialist replacements. The Government would not permit disaggregation within the FEA, because delivery geographies were designed to align with FEAs nationally and DWP requires a finite number of Accountable Bodies, placing existing DWP grant funding and delivery contracts at risk if disaggregation were pursued. Managing four significant delivery contracts through any transition is a further consequence, particularly as these run alongside a DWP grant agreement to 2030. If a Kent & Medway Strategic Authority is subsequently established, any prior disaggregation would need to be unwound to consolidate the service under that remit, adding cost and disruption.

Interdependencies
- Centralised KCC finance, comms, IT, procurement and HR - Kent Libraries, Family Hubs and Adult Social Care venues - DWP grant agreements and systems (PRaP, TYF) - Delivery partners Education People, Shaw Trust, Forward Trust, Aptem
Next Steps/ Actions
Now Map DWP grant agreements and delivery contracts against transition and expiry timelines. Next Confirm which authority holds the Accountable Body role and engage DWP. Future Align design with the likely future Strategic Authority remit.



Scope:
The service supports community and economic infrastructure through two discretionary elements. Village Halls provides grants (up to £10,000 per hall) to sustain and improve community facilities countywide. The Old Rectory Business Centre, a KCC-owned property in Northfleet, offers office accommodation to local businesses.

Does Disaggregation by default apply to this service? Yes

Why?

The Old Rectory is tied to a single Gravesham site and could transfer to the relevant successor. The discretionary Village Halls scheme, though modest, could be replicated at whatever level each authority resources. The Amber staffing rating reflects a single 0.8 FTE post, not a specialist barrier.

2.6.6 Village Halls and Old Rectory

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? The primary complexity sits with Staffing, the sole Amber-rated driver. The service is delivered by a single 0.8 FTE Project Manager, of which approximately one-third of time supports Old Rectory activity, and it therefore cannot straightforwardly be split across multiple unitaries at current staffing levels. Any continuation by successor authorities would require them to resource the function, though no highly specialist or professionally regulated roles are needed - rather, a good working knowledge of commercial contracts and community/external funding. A secondary consideration is the modest Village Halls non-staffing budget which may be insufficient to sustain the scheme at a smaller-than-county scale. This is a design consequence for successor authorities to weigh rather than a barrier to disaggregation. What are the potential risks of disaggregation that need to be considered? For Village Halls, the existing budget may be insufficient to make the scheme viable at a smaller-than-county scale, meaning successor authorities would need to decide the scale and design of any continued grant offer. For the Old Rectory Business Centre, there is no major risk associated with disaggregation, as the site and its self-funding model would transfer to the receiving unitary. A practical transition consequence is the timing of the Old Rectory management contract, which ends in October 2026, with a new one-year contract starting 1 November 2026 (with options for up to three further one-year extensions); this cycle will need to be aligned with reorganisation decisions. Continuity of live Village Halls grant agreements will also need to be worked through, either by honouring or novating them.

Interdependencies
- Procurement support for the Old Rectory management contract - Infrastructure support for Old Rectory property services and compliance - Kent ACRE advisory and promotional support for Village Halls - External contractor managing the Old Rectory Business Centre
Next Steps/ Actions
Now Assess timing risks around the Old Rectory management contract ending October 2026. Next Confirm each successor's appetite to continue Village Halls, Old Rectory, or both. Future Ensure adequate local resourcing to sustain both schemes at appropriate scale.



Table of Contents – GET – Growth and Communities: LRA

2 GET

2.7 Growth and Communities: LRA

[2.7.1 Archives](#)

[2.7.2 Libraries](#)

[2.7.3 Registration](#)

[Return to table of
contents](#)

Scope:
The Archives service conserves, protects and provides access to Kent's historical archive material, primarily through the Kent History and Library Centre (KHLC) in Maidstone, the county's designated place of deposit. It manages physical and born-digital records and provides public access, cataloguing, conservation, digitisation and outreach, delivered as a countywide service from a single site.

Does Disaggregation by default apply to this service? No

Why?

Archives should remain a single countywide archive function because collections, repository infrastructure, specialist systems and workforce cannot be separated without breaching obligations or undermining continuity. Outreach and digital activity may be localised later, but the recommended model is shared governance of the core archive service.

2.7.1 LRA - Archives

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (R)	●	Legislative (R)	●

Complexity Overview	Interdependencies
What makes this service complex to disaggregate? Complexity is concentrated in the Red-rated drivers of Legislative basis, Assets/Systems and Delivery Model, with Amber ratings on Demand and Staffing reinforcing the position. Legislation explicitly prohibits the division of predecessor county archive collections, meaning the core statutory repository function cannot be split between successor authorities. The Assets/Systems position is shaped by KHLC’s purpose-built controlled storage, specialist digitisation and conservation equipment, and interconnected cataloguing, preservation and public access platforms (CALM, CollectionsBase, Preservica, FindMyPast and Azure storage). The Delivery Model is centralised, single-site and heavily reliant on shared LRA and KCC corporate functions for business support, communications, data, ICT and property, with additional external storage under a contract held by the Modern Records Service. Staffing complexity arises from a small pool of qualified archivists and conservators whose sector-specific skills and location-linked recruitment challenges limit workforce flexibility. Demand adds further complexity because usage spans local, national and international users, is not readily predictable, and is not uniform across geographies.	• Shared LRA management and KCC ICT and property infrastructure • Co-location with Maidstone Library; Modern Records storage contract • The National Archives and DCMS statutory oversight • Preservica consortium and extensive perpetual depositor agreements
What are the potential risks of disaggregation that need to be considered? The most material consequence is legal, given the statutory prohibition on splitting archive collections, any structural split of the core collection would create legal and statutory compliance exposure. Physical and infrastructure duplication would be required if the service were replicated across successor unitaries, driving significant capital investment in new repositories and specialist equipment and eroding current economies of scale. The assessment also highlights operational disruption during transition, including the complexity of engaging several thousand depositors, some under perpetual agreements, whose contracts are tied to the current repository. Workforce risks are material because the specialist skills base is small and already difficult to recruit into, so fragmentation could weaken service resilience. The recommended countywide arrangement would mitigate these consequences by preserving collection integrity, statutory compliance and specialist capacity, but implies continued shared governance across successor authorities.	Next Steps/ Actions Now Map statutory obligations and depositor agreements against structural options. Next Agree a shared service or joint governance model across successor authorities. Future Preserve collection integrity, statutory compliance and specialist capacity countywide.



Scope:
KCC delivers an integrated Libraries, Registration and Archives (LRA) service countywide. Library provision includes 99 public libraries, 5 mobile libraries covering 274 stops, 5 prison libraries and a countywide e-library. Libraries act as community hubs delivering around 20,000 events annually. Delivery of library services statutory under the Public Libraries and Museums Act 1964.

Does Disaggregation by default apply to this service? Yes

Why?

The Libraries service is capable of disaggregation, with conditions and transitional arrangements. Core operations, buildings, local delivery, events and community functions, are deliverable at unitary level, while centralised functions (stock distribution, procurement, mobile and specialist services) can be separated with duplication or coordination. Statutory duty does not prescribe delivery structure.

2.7.2 LRA - Libraries

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in delivery model, budget and staffing. The service operates a hybrid model in which centralised functions, stock management and distribution, mobile library coordination, relief staffing, procurement, communications and business support, sit alongside district-level delivery, and libraries are operationally embedded within the wider LRA structure through shared staffing, management and delivery of registration services at 23 sites. Budgets are integrated across LRA and there are planned savings (library network review), creating financial dependency on structural decisions. Workforce is deployed flexibly across LRA functions, with recruitment and retention pressures in frontline and mobile driver roles, limited but embedded specialist capacity and the use of volunteers to support aspects of service delivery. Consortium and system dependencies (SELMS/Spydus, CBC/Askews, Bibliotheca, Netloan) and contracts with defined expiry dates add sequencing considerations to any disaggregation route.
What are the potential risks of disaggregation that need to be considered? There are potential implications for the integrated LRA operating model arising from disaggregation, including impacts on shared staffing, management structures and joint delivery of Registration in library sites. The need to establish county-level roles across successor unitaries may create additional cost considerations and maintaining countywide functions such as logistics, procurement and shared systems is highlighted as operationally challenging if handled in isolation. Recruitment across multiple new organisations may add to existing pressures in frontline and specialist roles, with a corresponding risk to skills continuity during transition. Budget allocation will be complicated by the potential absence of a library-only cost base within the LRA structure, and duplication of distribution and system arrangements is noted as a potential source of inefficiency. Broader considerations include impact on the Records Management service delivered by LRA for KCC Information Governance and general workforce transition and change-management pressures. There is potential to integrate a wider range of community services, including libraries, creating opportunities to maximise the use of the council's building estate. Cooperation agreements could also help retain functions that are most effectively delivered on a countywide basis.

Interdependencies
- Integrated LRA staffing, management and budgets; registration at libraries - Records Management for KCC Information Governance; corporate ICT and property - SELMS/Spydus consortium and Central Buying Consortium (Askews) - DCMS oversight, Arts Council funding, Libraries Connected support
Next Steps/ Actions
Now Establish a library-only cost base and map contract expiries against sequencing. Next Confirm whether Libraries and Registration remain aligned or are formally separated. Future Agree the future model for centralised stock, mobile and specialist countywide services.



Scope:
The Registration service delivers statutory registration of births and deaths and provides civil ceremonies including weddings, civil partnerships, citizenship and vow renewals across Kent and, under contract, for the London Borough of Bexley. It operates through five register offices, 23 library-based locations, a certificate centre and 200 licensed venues.

Does Disaggregation by default apply to this service? yes

Why?

There is no whole-service prohibition in legislation, delivery arrangements or operating model. The service already operates across multiple locations and defined ceremony areas, showing structural separability, with local functions delivered through a distributed site network aligning to successor geographies. Complexity relates to conditions - flexible LRA staffing, income allocation, shared support and the certificate centre – rather than barriers.

2.7.3 LRA - Registration

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview		Interdependencies	
What makes this service complex to disaggregate? Complexity is concentrated in the integration between Registration and the wider LRA structure, where shared staffing, support functions and library-based delivery locations mean multiple dimensions are operationally interwoven. Demand is geographically distributed but non-uniform, with specialist statutory activity (Registrar General licences, foreign national cases, inquests) and external ceremony demand requiring specific expertise rather than standard transactions. Delivery is hybrid, countywide and area-based, and relies on flexible deployment of staff across district boundaries to meet peaks such as winter deaths and summer ceremonies. Budget visibility is limited because Registration-specific staffing and non-staffing baselines were not separated from wider LRA figures, constraining assessment of cost drivers. Assets and systems complexity is driven by a distributed estate, secure storage requirements, and reliance on national platforms alongside a locally contracted booking system. Legislative conditions specify minimum organisational requirements, including that staff must be employed by a local authority and that each authority must have at least one register office.		- Integrated with Libraries and Archives (shared staffing, estate, support) - Centralised Certificate Centre and secure record storage - NHS Medical Examiners, GRO, Home Office, DWP, licensed venues - London Borough of Bexley contract; Cara Neo booking system	
Next Steps/ Actions			
Now Map shared LRA roles and establish Registration-specific staffing and budget baselines.		Next Confirm register office provision per authority, agree transition arrangements for post-Vesting Day ceremony/ appointment bookings, and agree the future Bexley contract position.	
		Future Sustain ceremony and certificate income and continuity of registration pathways.	

Table of Contents – GET – Growth and Communities: Strategic Development and Place

2 GET

2.8 Growth and Communities: Strategic Development and Place

2.8.1 Active Kent & Medway

2.8.2 Broadband

2.8.3 Culture and Creative Economy

2.8.4 Development Investment Team

2.8.5 Gypsy Roma Traveller Residents Service

2.8.6 Public Rights of Way

2.8.7 Straits Committee Partnership

2.8.8 Strategic Planning and Infrastructure

Return to table of
contents

Scope:
Active Kent & Medway is the local Active Partnership for Kent and Medway. It is part of a national Sport England-funded network tasked with increasing physical activity, tackling inactivity and inequality, and providing strategic leadership across local authorities, health, VCSE, education and sport. It is an unincorporated partnership hosted by KCC.

Does Disaggregation by default apply to this service? No

Why?
Active Kent and Medway should remain a single countywide partnership because Sport England funding depends on one mandated Active Partnership for Kent and Medway. Fragmentation would jeopardise funding and delivery continuity. The recommended pathway is transition to an independent legal entity or equivalent countywide host arrangement from April 2027, with the possibility of transferring into a Kent & Medway Strategic Authority, should that become an option.

2.8.1 Active Kent & Medway

Complexity Driver RAG Assessment					
Demand (G)		●	Delivery Model (R)		●
Budget (R)		●	Assets/ Systems (G)		●
			Legislative (G)		●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the Red-rated Delivery Model and Budget drivers. Sport England requires a single mandated Active Partnership covering the whole of Kent and Medway, so fragmenting the service into locality-based entities would put funding continuity at risk. The budget is externally funded and largely outside the MTFP, with ringfenced place-based allocations for Gravesham, Thanet, Medway and Swale managed inside a single countywide framework, meaning financial and delivery structures are tightly interlocked with funder conditions. The hosting agreement with KCC and the majority of Sport England contracts expire on 31 March 2027, creating a fixed timing pressure around any structural change. The Public Health contracts extend beyond and will need to be handled through Public Health’s LGR process. Staffing (Green) is a supporting factor rather than a barrier, but there are anticipated challenges in replicating workforce experience across multiple organisations if the partnership is fragmented.

What are the potential risks of disaggregation that need to be considered?
The most significant consequence is the risk of losing Sport England funding, as the funder will only provide funding via a single agent or directly to AKM as a legal entity. Disaggregating the service could therefore compromise the flow of £1.85m of Sport England grant income in 2026/27, alongside the Public Health Commission and Forever Active Kent funding. The expiry of the current hosting agreement and eight Sport England contracts on 31 March 2027 creates a hard deadline for confirming a viable future model, with Public Health contracts extending beyond that date requiring separate handling. There is also an evidenced consequence for the workforce, with anticipated challenges in replicating the small, senior-heavy team’s accumulated experience across multiple successor organisations. Ringfenced place-based funding for named districts adds a further transition consequence that would need to be preserved under any future model.

Interdependencies

- KCC corporate services (HR, finance, legal, Cantium) via hosting
- KCC Public Health commissioning extending beyond 2027 contract cliff
- Sport England primary funder shaping governance and delivery model
- Partnership ecosystem: local authorities, health, VCSE, education, sport

Next Steps/ Actions

Now
Map contract end dates against the 31 March 2027 funding cliff.

Next
Decide the preferred future model and which unitary hosts AKM.

Future
Preserve single countywide partnership to protect Sport England funding and place-based delivery.

Scope:
KCC's Broadband service supports delivery of improved fixed and mobile digital connectivity across Kent, enabling residents, businesses and communities to access reliable, high-speed broadband. A discretionary service within Strategic Development & Place, it works with telecoms operators to enable market-led investment and supports government programmes including Project Gigabit.

Does Disaggregation by default apply to this service? Yes

Why?

Broadband can technically be disaggregated, with no statutory barriers and no bespoke physical assets tying delivery to one geography; it is discretionary and uses standard platforms. However, a centralised countywide delivery model, long-term national programme and framework contracts, legacy clawback obligations to 2029, and concentrated specialist expertise shape how disaggregation should be sequenced.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.8.2 Broadband

Complexity Driver RAG Assessment					
Demand (A)			Delivery Model (R)		
Staffing (R)					
Budget (A)			Assets/ Systems (G)		
Legislative (G)					

Complexity Overview

What makes this service complex to disaggregate?

The main complexity sits in the delivery model and staffing, both rated Red, with contributory pressures from demand and budget (Amber). The delivery model is centralised and countywide by design, reflecting the strategic and cross-boundary nature of digital infrastructure, and is anchored by long-term contractual obligations, including framework agreements and legacy contracts with clawback monitoring beyond vesting day. Staffing complexity is driven by a small team of 4 FTE with concentrated senior expertise, niche technical and political skills, long development times, and recognised sector-wide recruitment difficulty. Demand is countywide and rising, extending to Medway and districts that rely on the KCC team for advice, while Budget complexity stems from unpredictable clawback repayments whose value and timing cannot be forecast. Assets/Systems and Legislative basis are Green, but it is noted that Kent-specific datasets and NDA-governed data introduce information-governance considerations that would need to be worked through during any separation.

What are the potential risks of disaggregation that need to be considered?

Duplication of scarce specialist staff across multiple unitaries as a primary consequence, with a knock-on risk of increased reliance on external consultants given known recruitment difficulties. Also flagged is a reduced capacity to engage in future Project Gigabit phases, and reluctance from telecoms operators to engage below county level, which could produce inconsistent policies and weaker leverage over market-led investment. Complex datasets subject to NDAs are identified as difficult and costly to disaggregate, creating a data and information-governance consequence for successor bodies. Continued clawback monitoring and contractual close-down obligations running to 2029 introduce a financial and contractual exposure that must be owned somewhere through transition. Offsetting opportunities include closer alignment with strategic planning and development control, and improved engagement with housing authorities on wayleave-dependent properties.

Interdependencies

- Kent Highways, Strategic Planning and Corporate Legal Services
- Public Switched Telephone Network migration/resilience work involving Adult Social Care
- BDUK, DSIT, Ofcom and telecoms operators
- Supports Medway Council and advice requests from Kent district councils

Next Steps/ Actions

Now

Map NDA-governed datasets and legacy clawback monitoring obligations running to 2029.

Next

Engage BDUK, DSIT and Ofcom on future accountability, and scope specialist workforce options.

Future

Sustain a viable operating model once legacy contracts conclude in 2029.

Scope:
KCC's Culture and Creative Economy Service (CCES) sits within Strategic Development & Place and works to maximise the contribution of culture and the creative industries to economic growth, wellbeing and place-making across Kent. It hosts the Kent Film Office, which permits filming and markets Kent as a filming location.

Does Disaggregation by default apply to this service? Part

Why?

Kent Film Office should be retained as a countywide function because its recognised brand, statutory highways powers, partner coordination and uneven income profile create greater value at Kent scale. Disaggregation risks weakening viability and economic impact, so transfer into 'Grow In Kent' is the clearest recommended future model. The rest of the CCES service could be disaggregated with mitigation of trade-offs and careful sequencing of transitional/shared arrangements.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.8.3 Culture & Creative Economy

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity concentrates in the Amber-rated Budget, Staffing and Legislative drivers and in the delivery characteristics of the Kent Film Office (KFO). The budget combines staffing, non-staffing, grants and income streams, including time-limited Arts Council England National Portfolio Organisation funding for Playground and annual grant commitments to Turner Contemporary, Kent Music School, Sevenoaks Visual Arts Forum and Creative Folkestone, with acknowledged geographic variation in KFO income. The staffing profile is small (6.8 FTE) but senior-heavy, with reliance on accumulated specialist expertise in cultural development, creative industry growth and filming, evidenced by past recruitment difficulty and 12–18 month training periods for KFO support staff. The KCC (Filming on Highways) Act 2010 covers Kent but not Medway, adding a geographic nuance to any structural change affecting KFO. Delivery relies on extensive interdependencies with internal KCC functions and external partners, particularly for filming coordination with statutory agencies.

What are the potential risks of disaggregation that need to be considered?

The most decision-relevant consequence is a potential weakening of countywide cultural provision, with the assessment flagging that disaggregation could erode the strategic insight and overview that allow low-capacity districts to benefit from economies of scale. Capacity to bid for large-scale funding could also reduce, particularly given DCMS's stated preference for joined-up regional funding aligned with mayoral or strategic authorities. Externally funded programmes, including NPO funding and other time-limited grants, may require sequenced or transitional governance to avoid breaching funder expectations. For KFO specifically, uneven filming activity across Kent (concentrated in East Kent) creates a consequence that geographically fragmented models could leave other parts of Kent without a viable Film Office, and the KCC (Filming on Highways) Act 2010's non-application to Medway adds a further transition consideration.

Interdependencies

- KCC Libraries (Playground), Highways, Legal, Finance and Economy
- Southeast Creative Economy Network regional sector leadership
- Arts Council England NPO funder for Playground
- Filming coordination with police, agencies; Openbrolly permit system

Next Steps/ Actions

Now

Clarify NPO and grant funder expectations on organisational or geographic separation.

Next

Decide whether Kent Film Office moves into the 'Grow in Kent' countywide service.

Future

Sustain specialist cultural expertise and capacity to bid for regional and national funding.

Scope:
KCC's Development Investment Team secures and manages developer contributions to fund infrastructure and council services across Kent. Within Growth & Communities, it negotiates and administers Section 106 agreements and the Community Infrastructure Levy with all 12 district and borough councils, and publishes a statutory annual Infrastructure Funding Statement.

Does Disaggregation by default apply to this service? Yes

Why?
There is no reason the service is unsuitable for disaggregation by default. This is supported by Green ratings for Budget and Assets/Systems and a model already combining district-aligned Area Leads with centralised functions. The recommendation is conditional: specialist expertise, shared systems, historic Section 106 balances and cross-boundary dependencies drive complexity.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.8.4 Development Investment Team

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Staffing is the most acute constraint: the team is small (8.5 FTE with 2 vacancies), holds highly specialist expertise in planning legislation, Section 106 drafting and negotiation that takes several years to develop, and faces recruitment pressure including from the private sector. Demand is countywide but uneven, shaped by the lifecycle and complexity of major strategic developments rather than raw application volumes, which means workload does not divide cleanly along district lines. The hybrid delivery model relies on sustained officer involvement in long-running cases and on centralised specialist functions, including a single-officer education capacity data resource. Shared use of the Mastergov system with other services, together with cross-service data flows underpinning the Infrastructure Funding Statement, adds systems and governance complexity. Legislative complexity arises from managing historic Section 106 agreements and financial balances, concurrent Local Plans, and DfE-approved Education Planning Groups whose boundaries may not align with future authorities.

What are the potential risks of disaggregation that need to be considered?
The service lead identifies monitoring and compliance failures as a primary risk if Section 106 and CIL oversight becomes inconsistent across successor authorities. Policy fragmentation is a related consequence, with the potential for divergent guidance and negotiation approaches once countywide coordination is removed. Loss of professional capacity, corporate memory and strategic coordination is flagged as a material risk given the depth of experience concentrated in a small team. Cross-boundary complications are highlighted for education planning and major strategic developments that straddle multiple districts, where disaggregation could disrupt long-running negotiations. There is also a risk of misalignment between Local Government Reorganisation outcomes and any future devolution arrangements, which could require rework if a Strategic Authority pathway later emerges.

Interdependencies

- Education, Adult Social Care, Libraries, Highways, PROW and wider KCC infrastructure services
- Shared Mastergov system; central Education school-capacity data resource
- Planning Inspectorate for planning processes and Department for Education for guidance and pupil yield data
- All 12 district and borough councils for planning processes and delivery

Next Steps/ Actions

Now
Map interdependencies, and clarify Mastergov contract options ahead of October 2026 expiry.

Next
Decide allocation of historic Section 106 agreements and balances across successor authorities, and plan continuity for long-running strategic developments.

Future
Confirm governance for consistent Section 106 and CIL monitoring across authorities.

Scope:
KCC's Gypsy Roma Traveller Resident Service manages accommodation for Gypsy and Traveller communities across Kent. It oversees six KCC-owned permanent residential sites (114 pitches) and manages one Tonbridge & Malling Borough Council site under agreement. The service is in-house and centrally run, using a 'housing plus' model. It also responds to unauthorised encampments on council-owned or controlled land countywide.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. There is no statutory geographic constraint, contracted delivery model or specialist systems limit separation (Delivery Model, Assets/Systems and Legislative basis all Green). The recommendation is conditional, with Amber Demand, Budget and Staffing pointing to transition risks: pitch licence obligations, resident trust, and arrears, all requiring a phased or transitional approach.

2.8.5 Gypsy Roma Traveller Residents Service

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (G)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is people-led and unpredictable: while the six residential sites are geographically fixed, unauthorised encampments can arise anywhere at any time (30 encampments handled in 2025), and demand for pitches exceeds supply with more than 60 families on the waiting list for KCC-managed sites. Residents' needs vary significantly and each pitch licence holder requires a tailored response, therefore workload cannot be standardised across successor authorities. Budget complexity is driven by factors such as reliance on rent and water charge income and historic arrears accrued since 2016. Staffing consists of only 4.47 FTE delivering countywide coverage, and the small team occasionally relies on partner support for unauthorised encampments. Delivery is also operationally interdependent with corporate Legal, Property and Finance functions, and the Tonbridge & Malling Borough Council Management Agreement adds a cross-authority arrangement.
What are the potential risks of disaggregation that need to be considered? The service lead identifies a primary risk that changes in landlord arrangements may require residents to enter into new licence agreements, necessitating consultation and potentially extending transition timescales. A landlord change also risks delays to Universal Credit and Housing Benefit rent flows and disruption to existing resident payment plans if bank details change. Continuity of urgent maintenance is flagged as a risk if agreements or relationships with KCC Property and Skanska are disrupted. A concern is noted that the housing-related complexities and uniqueness of the 'housing plus' model may not be recognised within alternative operating structures. Capacity to manage unauthorised encampments is a further risk given the limited pool of experienced staff. The arrears position represent inherited financial exposures that will need to be allocated between successor bodies. However, disaggregation could also present opportunities for alignment within a wider housing authority model, enabling economies of scale in contracts, asset management and operational delivery.

Interdependencies
• KCC Legal and Trading Standards Legal teams for general legal and encampment processes, respectively • Corporate Landlord, Property and Skanska for maintenance and compliance • KCC Finance for rent and water invoicing and payment allocation • Kent Police and districts for unauthorised encampments, and TMBC for the West Malling site
Next Steps/ Actions
Now Plan resident consultation for licence transition, and map Legal, Property, Finance and Skanska dependencies for successor arrangements. Next Confirm allocation of arrears, and TMBC agreement transfer. Future Sustain a viable 'housing plus' model preserving resident trust and safeguarding.



Scope:
KCC's Public Rights of Way (PRoW) & Access service, within GET's Strategic Development and Place division, delivers the Council's statutory duties to record, maintain and protect around 7,000km of public paths, including Kent's King Charles III England Coast Path sections. It maintains the legal Definitive Map and Statement.

Does Disaggregation by default apply to this service? Yes
Why?

Disaggregation by default applies. Delivery is already aligned to area-based teams (East and West), showing functions can be separated locally, and the assessment identifies no legal, contractual or operational barrier. Complexity relates to specialist workforce, integrated systems, uneven funding and county-held statutory records, not a hard structural constraint. The CLVG function may need shared retention.

2.8.6 Public Rights of Way

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity spans all six Amber-rated drivers rather than sitting in a single hotspot. Demand varies across the county, with DMMOs and around 60% of outstanding maintenance reports located in East Kent, while activity levels also fluctuate in response to development activity and coastal access work. Service delivery combines two Area Teams with a central specialist function covering the Definitive Map and Statement, CLVG, legal orders, planning and technical support. This model relies on the ability to deploy resources flexibly across the county to respond to changing demand. Workforce complexity is also significant. All roles are specialist, with training to competency typically taking 3–5 years for area officers and more than 5 years for definition officers. Recruitment is described as challenging and there is currently no established external pipeline. The service is funded through a mix of funding streams, including Section 106 and CIL contributions with multi-year trigger points, which would require a lot of unpicking in a disaggregated model. Assets and systems are closely connected, including CAMS, GIS, CON29 Local Authority Searches and the Power Platform, with shared datasets that are also used externally. Statutory records, including the Definitive Map, CLVG registers and the Rights of Way Improvement Plan, are currently maintained on a countywide basis. What are the potential risks of disaggregation that need to be considered? Several key considerations associated with disaggregation, including the potential loss of economies of scale, the concentration or loss of specialist knowledge, recruitment challenges, reduced flexibility to respond to variations in demand, and risks to statutory delivery and legal compliance. There is also the potential for an uneven distribution of skills across successor authorities. Data integrity, migration and liability risks are highlighted where system or dataset changes affect statutory outputs such as CON29 property searches. Disaggregation of Section 106 and CIL contributions tied to multi-year trigger points could create significant financial administration and sequencing consequences. Additional transition activity would be required to republish the Definitive Map and Statement, prepare multiple Rights of Way Improvement Plans, and reconfigure National Trails partnerships. The CLVG function's viability at 0.3 FTE is directly evidenced as a scale-sensitive consequence of splitting the service.

Interdependencies
- Central specialist function: Definitive Map, CLVG, legal orders - CON29 searches, KCC GIS and Infrastructure Mapping Platform - Natural England and DEFRA for national trails funding - Vegetation clearance contracts; Medway PRoW cross-boundary interface
Next Steps/ Actions
Now Map data migration and liability risk across CAMS, GIS and CON29. Next Agree shared arrangements for CLVG, Definitive Map and central specialist functions. Future Sustain the specialist workforce pipeline and cross-boundary national trail partnerships.

Scope:
The Straits Committee Partnership is a cross-border partnership arrangement between Kent and partner authorities in France, Belgium and the Netherlands. The Committee supports cross-Channel cooperation through project funding, partnership brokerage, policy support, advocacy and joint initiatives. KCC delivers its participation through two officers based in Brussels and northern France. The partnership operates through a political Executive Committee and a cross-authority officer network.

Does Disaggregation by default apply to this service? No

Why? The team is too small to split and complex overseas employment arrangements would require review. Splitting participation would increase organisational interfaces and weaken the clarity of Kent's representation. Future of the Committee depends on the appetite of successor authorities to continue participating in cross-Channel partnership activity. If maintained, a shared countywide arrangement is advised before potentially transferring to a Strategic Authority.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.8.7 Straits Committee Partnership

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?
Demand frequently involves cross-Chanel engagement, partnership development and support through the lifecycle of projects. Disaggregation could alter demand patterns, with transport and border-related activity potentially becoming concentrated within East Kent, while limited project funding may become fragmented across successor authorities. The current delivery model operates through a single Kent-wide structure embedded within an established international partnership framework, providing a recognised point of engagement for continental partners that supports coordinated cross-Channel activity. Disaggregation could require new governance, accountability and coordination arrangements, increasing the number of organisational interfaces and potentially reducing operational coherence. Workforce considerations are a significant driver of complexity. Delivery is concentrated within 2 FTE, supported by more than 50 years of accumulated experience, established international relationships, language capability and specialist European policy expertise. Replicating this capacity across multiple authorities would require investment in recruitment, relationship-building and network development, with a risk of diluting expertise and resilience. Further complexity arises from overseas-based assets including the Brussels office arrangement and use of the Hadelot Centre, alongside the complex legislative aspect of specialised UK-EU employment arrangements for staff based in France and Belgium.

What are the potential risks of disaggregation that need to be considered?
Disaggregation could affect the continuity and effectiveness of existing arrangements. The current model relies on longstanding relationships, established cross-Channel networks and consistent engagement with continental partners. A fragmented or inconsistent approach across successor authorities may weaken credibility and reduce continuity of engagement. A further risk relates to representation and strategic influence. If future arrangements do not secure coordinated participation across successor authorities, or if no Strategic Authority route emerges, there is a risk that the Committee's attractiveness, influence and strategic value to partner regions could diminish. Disaggregation could also dilute the benefits of the current model by requiring additional governance, coordination and administrative arrangements across successor authorities, and may increase workspace requirements beyond the existing arrangements, creating additional operational and financial implications.

Interdependencies

- Partner member authorities: The Provinces of Zeeland and Zuid-Holland (Netherlands); Departments of Nord and Pas-de-Calais (France); Provinces of West-Vlaanderen and Oost-Vlaanderen (Belgium).
- Committee works with KCC services where appropriate.
- Region Hauts-de-France provides rented workspace in Brussels.
- Hadelot Centre, France, occasionally used for Straits Committee events and workshops.
- KCC-hosted Microsoft Teams site used for shared document storage.

Next Steps/ Actions

Now
Confirm each successor authority's position on continued Straits Committee participation.

Next
Plan overseas staff transfer, including A1 and S1 documentation and due process costs.
Plan transfer of Microsoft Teams site and EU portal registrations.

Future
Agree how cross-Channel engagement will be coordinated across successor authorities and a potential Strategic Authority.

Scope:
KCC's Strategic Planning and Infrastructure service leads a pan-Kent approach to planning and infrastructure. Within Strategic Development & Place, it coordinates KCC responses to national planning policy, Local Plans, Nationally Significant Infrastructure Projects (NSIPs) and Neighbourhood Plans, supports the strategic approach to energy infrastructure, and manages the Infrastructure Mapping Platform.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default with Demand, Budget and Legislative basis all Green and no statutory geographic constraint. The recommendation is conditional, shaped by the statutory Kent and Medway Spatial Development Strategy duty, specialist staff recruitment pressures and the Infrastructure Mapping Platform.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.8.8 Strategic Planning and Infrastructure

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Delivery is countywide-oriented and driven by externally set planning timetables, and a new statutory duty to produce a Kent and Medway Spatial Development Strategy (SDS) will guide development for Local Planning Authorities across the area. Staffing complexity is driven by concentrated specialist expertise, four vacant posts within an 11.6 FTE team, and Royal Town Planning Institute chartered requirements for the SPI Manager and Principal Planning roles, alongside sustained recruitment and retention challenges linked to private sector pay competition. Assets/Systems complexity centres on the Infrastructure Mapping Platform, developed by Cantium specifically for countywide mapping of growth and infrastructure, which relies on coordinated data inputs from multiple internal services, Districts and Boroughs, Medway Council, the NHS and statutory bodies. The service also has a training and enabling role across KCC on Local Plans, NPPF consultations, NSIPs, Strategic Planning Applications, the Regional Energy Plan, and Planning for Health, which loses a central coordinating point if the team is divided. Grant-funded activity (Arcadis-supported NSIP guidance, the Local Digital Fund grant for the Infrastructure Mapping Platform, and the Pathways to Planning grant) is restricted to specified purposes and adds a compliance dimension to any transfer.

What are the potential risks of disaggregation that need to be considered?

The service lead identifies the primary risk as the loss of a countywide strategic view of planning, growth and infrastructure if the service is disaggregated. The absence of a Strategic Authority could make achieving the pan-Kent and Medway approach required by the Spatial Development Strategy more problematic. Replicating specialist and professionally regulated expertise across multiple organisations may be difficult given existing recruitment challenges and competition with the private sector. The Infrastructure Mapping Platform is a further consequence-bearing dependency: disaggregation would require new governance, access and data-sharing arrangements to maintain platform functionality across multiple unitary councils. Loss of the team's central training and enabling role across KCC could also affect consistency of planning practice across services.

Interdependencies

- KCC Transport, Highways, Minerals & Waste, Education, Public Health, Social Care and external partners for data and specialist input
- Cantium and Infrastructure Mapping Platform for governance and access
- Districts and Medway for planning timetables, Local Plans and data inputs
- Grant-funded arrangements: MHCLG NSIP, Local Digital Fund, Pathways for Planning

Next Steps/ Actions

Now

Map data-sharing agreements, and plan contract novation and grant compliance for Arcadis, Local Digital Fund and Pathways for Planning.

Next

Confirm arrangements for joint delivery of the statutory Kent & Medway Spatial Development Strategy.

Future

Decide governance and ownership of the Infrastructure Mapping Platform across authorities.

Table of Contents – GET – Highways and Transportation

2 GET

2.9 Highways and Transportation

2.9.1 Strategic Contracts and Commissioning

2.9.2 Strategic Resilience

Scope:
Sitting within Highways and Transportation, the Strategic Contracts and Commissioning service provides countywide procurement, commissioning and commercial oversight of the major contracts needed to operate, maintain and improve KCC's 5,500-mile highway network and associated assets. It covers strategic management of the Highways Term Maintenance Contract and several highways frameworks/contracts, alongside financial governance, payment reconciliation, custody of developer and partner funds, and stewardship of contract management, financial and asset systems. It is delivered in-house through a team of 24.1 FTE.

Does Disaggregation by default apply to this service? Yes

Why?

The service is non-statutory, prescribes no geographic model and does not rely on location-specific assets; the function could be disaggregated into the successor unitaries. However, the service's value lies in centralised Highways commissioning and contract management, so any change should be phased and carefully sequenced around live contract mobilisation and system reconfiguration.

2.9.1 Strategic Contracts and Commissioning

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in Demand, Delivery and Assets/Systems. Staffing remains an implementation consideration because of specialist accreditation requirements. Demand is countywide and structurally complex. It is driven by the scale of the network, which covers more than 5,500 miles, around 200,000 customer contacts per year across Highways and Transportation, high-value multi-year contracts, diverse asset types, and regulatory and governance requirements. The complexity is therefore linked to scale and service breadth rather than to geographic distribution. The evidence also indicates that category planning and strategic contract understanding would need to be redesigned at a more local level under any disaggregated model. Delivery is based on a centralised, countywide 'intelligent client' model, with no local teams. Under disaggregation, this model would need to be replicated locally while maintaining the same range of service coverage. Assets and systems complexity is significant: there are strong interdependencies between contract management, asset and financial systems and performance reporting. Ongoing transformation adds further complexity, such as the new HTMC mobilisation and digital transformation of asset management and performance reporting. While the systems could be replicated across successor authorities, data migration, system set-up timelines and additional cost would require significant transition considerations.

What are the potential risks of disaggregation that need to be considered?

The service lead identified risks including fragmentation of governance, loss of consistency across contract and commissioning activity, and the complexity of separating large countywide contracts. Disaggregation would require duplication, migration and separation of data across multiple platforms, creating risks to data integrity, reporting continuity and system assurance. Loss of specialist expertise, reduced resilience and reduced flexibility to respond to changing demand or priorities could weaken the service's ability to act as an effective 'intelligent client'. Disaggregation could increase costs through duplication of central functions, reduced economies of scale and higher supplier costs, and weaken financial control and audit assurance if governance, reporting and contract management arrangements are fragmented. There are opportunities for more localised decision making, redesigning delivery models and innovation potential, which could be realised if the risks are sufficiently mitigated.

Interdependencies

- H&T operational services for whom it acts as intelligent client
- Corporate Finance, Legal, ICT (Cantium) and Procurement
- Major countywide contracts including HTMC; contractors and suppliers
- DfT, National Highways, Medway Council; utilities providers, developers and regional transport bodies primarily through commissioning, funding, compliance and delivery arrangements

Next Steps/ Actions

Now

Map NEC4-accredited specialist roles against successor authority capacity, and assess systems' separability.

Next

Sequence live countywide contracts (e.g. HTMC mobilisation) and identify contracts requiring novation.

Future

Sustain intelligent-client capability and economies of scale, and design consistent governance and compliance frameworks across successor authorities.

Scope:
Within KCC's Highways and Transportation division, the Strategic Resilience Team prepares for and manages transport-related disruption during exceptional pressure. It leads on border resilience, planning for port operations, freight movements and new border controls including the EU Entry/Exit System, and coordinating national and local partners. Delivery is in-house and discretionary.

Does Disaggregation by default apply to this service? No

Why?
Strategic Resilience should remain countywide because its border resilience role depends on a single strategic lead, cross-boundary coordination and consistent prioritisation during disruption. Fragmentation would weaken governance and reduce effectiveness. A shared service or future Strategic Authority alignment is the strongest route to preserve resilience and partnership coherence.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.9.2 Strategic Resilience

Complexity Driver RAG Assessment			
Demand (A)	●	Delivery Model (A)	●
Staffing (A)	●		
Budget (A)	●	Assets/ Systems (G)	●
		Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is geographically concentrated in East Kent (Dover, Folkestone and Hythe) due to Eurotunnel and the Port of Dover but extends into Ashford and Maidstone when Operation Brock is active, meaning workload crosses multiple unitary footprints. Delivery is a centralised, coordination-heavy function that depends on established multi-agency arrangements through the Kent and Medway Resilience Forum (KMRF) and on national bodies including the Department for Transport, National Highways, Kent Police, the Port of Dover and Eurotunnel. Budget complexity arises from reliance on a time-limited DfT Section 31 grant confirmed only to 31 March 2028, with the majority of spend concentrated in East Kent and border-related issues expected to continue into the 2030s. Staffing complexity is driven by scale rather than specialism: a small team of 4.8 FTE, covering a countywide remit with no highly specialist or regulated roles. Physical works are delivered through the Highways Term Maintenance Contract awarded to Ringway on a Kent-wide 14-to-21-year term, adding a countywide contractual dimension. What are the potential risks of disaggregation that need to be considered? The primary risk relates to competing priorities across successor authorities, where interventions that benefit one area can adversely affect another, undermining the coordinated response needed during major border disruption. The assessment flags a consequence of loss of coherence in strategic coordination and planning, and fragmentation of established governance and partner confidence with the DfT, National Highways, Kent Police and other KMRF partners. Financial uncertainty is a further consequence, given the DfT Section 31 grant currently ends on 31 March 2028 whereas border-related issues are likely to persist beyond this point and spend is concentrated in East Kent while some falls in Ashford and Folkestone and Hythe. Resilience risk arises from dividing a 4.8 FTE team across multiple authorities, which the assessment does not evidence as sustainable. The recommended alternative pathway of a future Strategic Authority function or a temporary countywide agreement is intended to mitigate these consequences and is described in the Recommended pathway / exception detail section of the assessment.

Interdependencies
- KCC Communications fronting National Highways and DfT messaging - Resilience and Emergency Planning Service via KMRF - Ringway Highways Term Maintenance Contract for physical works - DfT funder, National Highways, Police, Port of Dover, Eurotunnel
Next Steps/ Actions
Now Map how the 4.8 FTE team is transferred, shared or hosted. Next Secure future funding beyond the DfT Section 31 grant ending March 2028. Future Sustain a single strategic border-resilience lead, potentially within a Strategic Authority.

Table of Contents – GET – Highways and Transportation: Highways Asset Management

2 GET

2.10 Highways and Transportation: Highways Asset Management

2.10.1 Highways Asset Management 1 - Strategic Assets, Street Lights assets, Soft landscape assets, Drainage assets, Structures and tunnels assets, and Carriageway/footways/cycleway assets

2.10.2 Highways Asset Management 2 - Safety Inspections, Routine Maintenance, Emergencies, Winter Service, Priority Response, Vehicle Crossings, High Speed Roads Programme, Fly-tipping and Enforcement

2.10.3 Highways Asset Management 3 - Streetworks, Compliance/Data Team

Return to table of contents

Scope:
This grouping within KCC's Highways and Transportation division, led by the Head of Highways (Assets), manages six countywide asset areas: strategic assets (HAMIT), street lighting, soft landscaping, drainage, structures and tunnels, and carriageway, footway and cycleway assets. It maintains the Highway Gazetteer and delivers renewal, preservation, inspection and reactive works across the highways network.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies to this Highways Asset Management grouping; the evidence identifies no whole-service hard constraint. Some elements - carriageway and footway management, drainage delivery and district-split street lighting - already operate with area-aligned responsibilities and are more readily disaggregable. Structures and tunnels, major drainage and street lighting would need transitional or shared arrangements.

2.10.1 Highways Asset Management 1

Strategic Assets, Street Lights assets, Soft landscape assets, Drainage assets, Structures and tunnels assets, and Carriageway/footway/cycleway assets

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (R)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is managed countywide but shaped by place-specific and incident-timing factors, including soakaway failures, poorer-condition structures and tunnels, and clay-soil instability. It is also affected by less predictable pressures such as heavy rainfall, storms and major asset failures. The delivery model combines centralised in-house expertise with large countywide contracts, with teams varying in how far services are outsourced. Staffing complexity reflects scarce specialist capability with training pipelines for some roles exceeding ten years. Budget complexity reflects countywide management of funding streams, including DfT Highways Maintenance Block grants, potholes funding, and £25m per annum of KCC asset management borrowing, which partly supports incentive funding. Asset and systems complexity is significant, reflecting specialist operational infrastructure, interdependent digital platforms and legacy information requirements. Legislative complexity is targeted rather than universal, including functional independence of named roles under the Road Tunnel Safety Regulations and the 24/7 open-on-demand duty for Sandwich Toll Bridge. Any transition would therefore require a service-by-service approach.
What are the potential risks of disaggregation that need to be considered? The most significant risks are losing scale, efficiency and value if contracts, budgets and purchasing power fragment, reducing commercial leverage and increasing costs. Workforce fragmentation could intensify competition for scarce specialist skills, while a more fragmented model may weaken resilience and emergency response during storms, flooding or major asset failures. There are also risks of inconsistent standards between successor authorities, uncertainty over cross-boundary asset ownership and funding, weakened lifecycle planning from data fragmentation, tunnel compliance issues, and reduced ability to fund major drainage schemes through pooled budgets. However, disaggregation could also present opportunities through more locally tailored delivery, stronger alignment with local planning and regeneration priorities, and greater flexibility to innovate and respond to place-specific needs.

Interdependencies
- Highway Operations, Transportation, PRow, Streetworks and Intelligent Transport Systems for coordinated network delivery - Flood, Environment and Ecology teams for statutory and environmental duties - Emergency services, National Highways, Network Rail, UK Power Networks for cross-network operations - Countywide contracts: HTMC, Road Asset Renewal, Street Lighting
Next Steps/ Actions
Now Confirm which functions require countywide operation on Day 1 due to statutory constraints, and map minimum specialist workforce for tunnel and structures statutory compliance. Next Agree novation or shared management routes for major highway maintenance contracts. Future Determine how will cross-boundary assets will be managed.

Scope:
Highways Asset Management 2 covers KCC's day-to-day operational stewardship of the county road network: safety inspections, routine maintenance, emergencies, winter service, priority response, vehicle crossings, the High Speed Roads Programme, and fly-tipping enforcement. Delivered countywide through c.105.6 in-house FTE plus the Highways Term Maintenance Contract (HTMC), the service exercises the Highways Act 1980 duties under section 41 to maintain the highway in a safe condition.

Does Disaggregation by default apply to this service? Yes

Why?

No whole-service barrier prevents disaggregation; legislation prescribes no delivery geography and frontline delivery is already locality-based, so each unitary could meet its Section 41 duties. Demand is network-driven rather than boundary-driven. Scale-dependent components - the long-term HTMC, depot-based winter service, countywide asset system and High Speed Roads Programme – require carefully sequenced transitional or shared arrangements, rather than constitute as barriers.

2.10.2 Highways Asset Management 2

Safety Inspections, Routine Maintenance, Emergencies, Winter Service, Priority Response, Vehicle Crossings, High Speed Roads Programme, Fly-tipping and Enforcement

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is volatile and risk-based, rather than geographically predictable, with peaks linked to weather events, asset deterioration and incidents. A significant proportion of activity also requires specialist judgement, statutory enforcement capability, 24/7 emergency response, and specialist traffic management for high-speed roads. The current delivery model combines local operational presence with strong central governance, systems and assurance. It is materially dependent on several countywide arrangements. These include the Ringway HTMC; the depot-based Winter Service model; the countywide Works and Asset Management System, and countywide High Speed Roads Programme. Workforce complexity is driven by the concentration of specialist and accredited roles. Budget complexity reflects the countywide management of revenue, capital and income streams, together with £25m per annum of Asset Management borrowing used to unlock HMB incentive funding. It is further affected by variation in asset condition and maintenance backlog. Systems and asset complexity centres on Brightly Confirm, the Works and Asset Management System which is integrated across the division and supported by a wider systems landscape. Legislative complexity arises from the need to maintain consistent inspection regimes, defect thresholds and evidential records. What are the potential risks of disaggregation that need to be considered? The evidence identifies several decision-relevant consequences. The most significant risks relate to maintaining consistent inspection regimes, defect thresholds and evidential records across successor authorities. Any weakening of audit trails or statutory records could affect safety outcomes, customer experience and claims defensibility. Reduced resilience and surge capacity during severe weather or periods of high demand is also a concern, as disaggregation may limit the ability to flex resources across the network. Fragmentation of the long-term HTMC could require contract restructuring, shared governance arrangements or re-procurement, with associated commercial and operational consequences. There are risks associated with separating the Works and Asset Management System. Workforce disaggregation could intensify known challenges. A more fragmented customer interface could increase boundary confusion, escalations and contact volumes. However, disaggregation could also create opportunities for more locally tailored prioritisation, clearer local accountability for service outcomes and customer communications, and the redesign of processes and interfaces.

Interdependencies
• Contact centre, IT, GIS for Brightly Confirm asset system • Finance, Insurance, Legal for claims and Section 58 defence • Ringway HTMC to 2040/2047; winter, weather and specialist contractors • Operational partnerships, e.g. emergency services, National Highways, neighbouring highways authorities, districts, DfT, Met Office
Next Steps/ Actions
Now Map HTMC and related contracts for novation, joint governance and mobilisation options. Next Baseline common inspection regimes, defect thresholds and Section 58 record-keeping standards, and agree future of Works and Asset Management System. Future Preserve surge and mobilisation capacity and common system governance across successor authority boundaries.

Scope:
The Streetworks and Compliance/Data Team, within KCC's Highways and Transportation division, regulates, coordinates and oversees works on the public highway by utilities, developers and KCC teams. Under New Roads & Street Works Act, the Traffic Management Act and Kent Permit Scheme it handles permitting, inspections, licensing and Lane Rental, and ensures KCC meets its legal duty to coordinate highways activities and minimise disruption. Delivered in-house by 79 FTE across four area teams.

Page 106
Does Disaggregation by default apply to this service? Yes
Why?

Disaggregation by default applies: area-based delivery already operates through four Streetworks teams and legislation prescribes no geographic footprint. Complexity relates to the specialist qualified workforce, pooled income and shared national platforms; component-level, not structural. Countywide Compliance, Enforcement and Data functions, income administration and statutory permitting systems may need transitional or shared arrangements pending further due diligence.

2.10.3 Highways Asset Management 3

Streetworks, Compliance/Data Team

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is consistently high and increasing. It is driven by housing growth, ageing utility networks, major national infrastructure schemes such as the Lower Thames Crossing, and growing activity linked to broadband rollout, EV charging and renewable energy programmes. The delivery model combines four area-based teams with countywide Data, Compliance and Enforcement functions, and there is some limited ability to redeploy staff across areas to manage peaks in demand. Staffing complexity reflects the legal qualification requirements for the service, e.g. all Coordinators and Inspectors must hold the Streetworks Qualification, and it typically takes three to five years to reach full competence. The evidence also highlights recruitment and retention challenges, linked to a rigid grading structure and the loss of experienced staff to other KCC Highways teams. Budget complexity arises from the current countywide, income-funded model. Income is pooled from permits, Lane Rental, Section 74 charges and Fixed Penalty Notices across Streetworks and other Highways teams. Assets and systems complexity is driven by reliance on multiple statutory and operational platforms, such as Street Manager.
What are the potential risks of disaggregation that need to be considered? There is a risk of network gridlock, loss of income, and non-compliance with the New Roads and Street Works Act 1991 and the Traffic Management Act 2004. Additional concerns include a reduced ability to flex resources across teams to respond to complex peaks in demand, and the potential for inconsistent interpretation and application of legislation across multiple unitary authorities. There are also financial implications of any change, as income is pooled and utilised across Streetworks and wider Highways functions, forming an important component of the Council's Medium-Term Financial Plan (MTFP) assumptions. Furthermore, statutory coordination with neighbouring highway authorities - including National Highways, Medway, Surrey, Bexley, East Sussex and Bromley - as well as the Department for Transport (DfT) and Transport for London (TfL), would need to be maintained throughout and beyond any transition period. Continued participation in key industry forums would also remain essential to support effective network management and regulatory compliance.

Interdependencies
• Wider Highways functions e.g. HTMC and Road & Footways team's coring contract • Pooled permit, Lane Rental, Section 74, and FPN income (MTFP) • Neighbouring highways authorities, National Highways, DfT, TfL for coordination • Street Manager, Mayrise, one.network, Stargo, Confirm platforms
Next Steps/ Actions
Now Map qualified workforce coverage across four area teams and countywide functions. Next Assess licence portability, hosting and data ownership for statutory permitting platforms. Future Allocate or rebaseline income across successor authorities, and preserve consistent cross-boundary statutory interpretation.

Table of Contents – GET – Highways and Transportation: Public Transport

2 GET

2.11 Highways and Transportation: Public Transport

2.11.1 Client Transport Operations and Planning

2.11.2 Fastrack Development

2.11.3 Public Transport Business Team

2.11.4 Public Transport Planning and Operations

Scope:
The Client Transport Operations and Planning service plans, commissions and manages KCC's statutory passenger transport for eligible children, young people and adults. It supports travel for c.10,000 users countywide, covering free home-to-school and college transport that meets statutory criteria, SEND transport, social care transport, and also for unaccompanied asylum-seeking children. A team of 16.4 FTE, with planning and contract management centralised in-house, and transport delivery outsourced to public and private providers.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. Demand is statutory and countywide but driven by eligibility, placement and safeguarding need, not a fixed hub or asset base. Centralisation is an operating-model choice, not a statutory requirement, so functions are divisible. Safeguarding, commissioning scale and time-critical UASC transport need shared or hosted arrangements during transition; manageable implementation issues rather than barriers.

2.10.1 Client Transport Operations and Planning

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity concentrates in the three Red-rated drivers - Demand, Delivery Model and Legislative, supported by two Amber drivers. Demand is high-acuity and statutory across four distinct client groups, each requiring individually assessed, bespoke transport rather than standardised provision, with UASC transport running 24/7, 365 days a year, bound by a one-hour MOU response and subject to seasonal volatility. The service's delivery model is fully centralised, retaining entitlement decisions, planning, contract management, safeguarding oversight and customer liaison in-house while outsourcing transport, with multifunctional teams sharing resources across SEND, social care and UASC to absorb fluctuations - creating strong interdependencies that limit clean separation. Contractual scale is significant, fluctuating year on year and amounting to thousands of contracts with providers. Legislative complexity reflects statutory duties across all client groups and embedded safeguarding requirements, though no legislation mandates a particular geography. Budget interdependency arises because transport spend sits with other directorates (CYPE, ASCH) rather than the service. What are the potential risks of disaggregation that need to be considered? The Service Lead identifies difficulty spreading sufficient experienced resources across multiple unitary councils as a primary risk, with immediate consequences for statutory delivery given a small centralised team. Dependence on the Dynamic Purchasing System is a material consequence: the purchasing arrangement would need to be replaced by something similar by each Authority, which would be time-consuming and allow for re-negotiation of commercial arrangements. Loss of flexibility to respond to volatile and sensitive demand - particularly time-critical UASC transport - and fragmentation of specialist expertise are highlighted, alongside duplication of commissioning and safeguarding functions and increased risk to statutory compliance and continuity of service. The 'Day 1', continuous nature of the service means it cannot be paused during transition, so some form of hosted or shared operation would be needed throughout. However, disaggregation may also create opportunities for closer local integration with related functions, such as Fair Access, SEND transport entitlement and district taxi licensing, supporting more joined-up transport planning and management within smaller unitary areas.

Interdependencies
- Fair Access, Adult and Children's Social Care for placements - Public Transport Business Team for supplier, safeguarding and compliance support - Cross-directorate budgets (CYPE, ASCH); shared digital platforms with other KCC teams e.g. Routewise contract & client management system - Commercial market operators for transport delivery
Next Steps/ Actions
Now Identify a viable commissioning framework given the Procurement Act 2023 transition. Next Plan novation of live transport contracts, and secure shared system and data access. Future Determine minimum viable scale for managing volatile, high acuity demand and explore whether a permanently shared client transport function is needed to sustain statutory compliance and resilience.

Scope:
Within KCC's Highways and Transportation division, Fastrack Development manages two bus rapid transit networks: Kent Thameside and Dover. It oversees operator performance, reliability and customer experience, and leads network enhancements including bus priority measures and infrastructure. Delivered by an in-house team of 4.72 FTE with bus operations outsourced, the service is discretionary.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies. The service is discretionary with no legislative geography; demand is concentrated in two defined footprints, operations are outsourced scheme-by-scheme, and depots are third-party owned: no structural barriers. Complexity relates to specialist expertise and delivery, mixed funding streams and internal support. The small central team's functions would require transitional or shared arrangements and phased implementation.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.10.2 Fastrack Development

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is geographically concentrated in Thameside and Dover, but the schemes are commercially and operationally complex. They involve fleet electrification, charging infrastructure, multiple ticketing offers and future growth ambitions. Volumes also differ significantly between the two schemes. Delivery combines a centralised in-house planning team with outsourced bus operations delivered through long-term operator agreements. It depends on support from the Public Transport Business Team for finance, forecasting, timetabling and inspectorate activity; Commissioning for contract management; and Transportation's Major Capital Projects for highway assets such as bus gates, markings and shelters. Staffing complexity reflects the small size of the team at 4.72 FTE, and the specialist experience required. Two roles have been specifically identified as needing significant local authority and commercial public transport expertise, within a wider labour market described as constrained. Budget complexity is driven by a multi-source funding model. Fare income is supplemented by numerous national and local funding sources such as Section 106 funding, Dover District Council funding and TfL income for the use of dedicated Thameside lanes. The non-staffing budget is held at the wider Public Transport level, and income varies significantly between the two schemes. What are the potential risks of disaggregation that need to be considered? The service lead identified primary risks as the reliance on a very small team, with dedicated officers holding significant scheme knowledge, and dependence on wider Public Transport teams, particularly finance support. They also highlight the importance of the Fastrack brand, which has been built-up over many years through significant capital and revenue investment. Key delivery risks include the challenge of splitting the two schemes and the potential constraint this could place on future expansion opportunities, particularly as current service development focusses on new infrastructure to support housing growth across the county. Potential consequences identified include reduced flexibility to deploy specialist expertise, duplication of central Public Transport support, loss of economies of scale in shared systems and procurement, and dilution of the Fastrack brand, which currently operates across multiple locations.

Interdependencies
- Public Transport Business Team for finance, forecasting, timetabling and inspectorate support, and wider PT service for non-staffing budget and managing income streams - Commissioning for contract management/procurement; Major Capital Projects for infrastructure - Commercial operators, TfSE's Podaris planning tool, TfL for Thameside lanes - Dover District Council for the Dover scheme and district councils regarding updates to the bus services
Next Steps/ Actions
Now Map minimum specialist staffing needed to sustain planning and contract management. Next Clarify and agree apportionment of centrally managed non-staffing budget and mixed funding streams Future Confirm whether Fastrack is split by scheme, retained countywide, or moved into a Strategic Authority.

Scope:
The Public Transport Business Team, within Highways and Transportation, provides financial management, compliance, management information and business support for the Public Transport department and its clients. It processes supplier invoices, manages concessionary schemes, supports procurement, and forecasts and monitors transactions exceeding £135 million. It maintains bus route/stops databases and Routewise and Novus systems. Delivered centrally, in-house by 16.29 FTE.

Does Disaggregation by default apply to this service? Yes

Why?
There is no reason the service is unsuitable for disaggregation by default; no legislation specifies a particular geographic delivery model, demand is countywide without material variation, and the externally sourced systems are capable of being disaggregated. A centralised enabling platform for Public Transport, CYPE and ASC, the constraints are primarily operational and would require careful sequencing and transitional arrangements.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.10.3 Public Transport Business Team

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

The assessment found that delivery is fully centralised and in-house. Finance, compliance and public transport information functions are interdependent with the wider department and provide the operating platform on which other Public Transport services rely. Demand is countywide and does not show material geographic variation. However, the work itself is highly specialised, covering financial management, compliance, counter-fraud activity, safeguarding and public transport information. The service engages with more than 500 suppliers, ranging from sole traders to multinational organisations. Staffing complexity centres on a small workforce and specific senior and technical roles that are not readily replicable. Budget complexity arises because non-staffing costs are held at departmental rather than team level. Assets and systems complexity centres on Routewise, Novus, Delta and Oracle: these systems support supplier onboarding, information management, compliance and financial processing, as well as shared datasets used by other authorities and national platforms.

What are the risks and consequences of disaggregating?

The service lead identified the primary risks as the potential loss of vital technical knowledge and experience held by senior roles and those with countywide remits, the risk of key staff seeking opportunities elsewhere, and the need to disaggregate and replicate bespoke ICT systems that are essential to service delivery. Disaggregation would create duplication of specialist roles and systems, with a risk of losing expertise that is not readily replicable across multiple successor authorities. It could also disrupt the financial, compliance and safeguarding processes that other services rely on. Because the team acts as an enabling platform for the wider Public Transport department, as well as for CYPE and ASC client transport activity, disaggregation would have cascading impacts across dependent services and resident journeys. Any decision to disaggregate this team would therefore need to be aligned with decisions on the wider Public Transport department and the services it supports. The assessment also identified a further financial consequence relating to external income: the team currently generates approximately £100k from providing public transport information services to five other local authorities and bus operators.

Interdependencies

- Wider Public Transport department relies on this service which underpins delivery
- CYPE and ASC client transport processing and forecasting
- Routewise and Novus for contract/client management, Delta for procurement (all externally sourced), and Oracle system for financial processing
- 500+ suppliers; £100k external income ceasing 2026/27

Next Steps/ Actions

Now

Map financial oversight of £135m+ annual transactions and 500+ suppliers.

Next

Decide continuity model and plan system separation, licensing and data governance for Routewise, Novus and Delta, and determine minimum viable scale for retaining specialist expertise.

Future

Determine delivery models for finance, compliance and information platform; manage cascading impacts on dependent services.

Scope:
Within KCC's Highways and Transportation division, this service manages statutory responsibilities for public bus services and arranges mainstream school transport for the CYPE Directorate. It covers socially necessary bus services, bus policy & strategy, bus stop infrastructure, the English National Concessionary Travel Scheme (ENCTS), Kent Travel Saver schemes and mainstream schools transport. It is delivered by c.17 FTE staff.

Does Disaggregation by default apply to this service? Yes

Why?
Disaggregation by default applies. Legislation prescribes no delivery geography; area-aligned planning teams already serve districts, and demand is structurally consistent countywide. Complexity relates to a specialist workforce, centrally held budgets and shared systems, rather than a whole-service structural barrier. Countywide single-post roles, shared systems, and contracts to 2028–2029 would require carefully phased transitional arrangements.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.10.4 Public Transport Planning and Operations

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Demand is countywide and at scale, with significant peaks around academic year transitions and Department for Transport deadlines. The service covers more than 400 bus services, including 150 subsidised services. It also supports around 250,000 ENCTS pass holders, 27,000 Travel Saver pass holders and 6,000 eligible children for mainstream school transport. The delivery model combines area-aligned planning teams with countywide specialist and assurance functions. These arrangements rely on the Public Transport Business Team for finance, supplier management, contract compliance, legality and safeguarding. Staffing complexity reflects the small size of the team, at approximately 17 FTE. Several countywide specialist roles are held by individuals with significant experience, within a labour market described as scarce. The evidence also notes a notable reduction over time in the number of staff supporting public bus services, indicating a staffing trend that could affect future resilience. Legislative complexity spans several statutory duties and requirements. These include the Education Act 1996, transport legislation, the Concessionary Travel scheme, and highway-related duties for bus stops. Forthcoming obligations under the Bus Services Act 2025, expected from April 2027, add further complexity.

What are the potential risks of disaggregation that need to be considered?
The service lead identifies the most decision-relevant consequences as challenges in distributing sufficient experienced resources across multiple unitary councils; replication of single-post countywide specialist roles where skills are scarce; loss of efficiencies in shared transport for mainstream schools; potential inefficiency if countywide systems (Routewise and Delta) are replaced by separate unitary systems; and complexity in future divergence of bus policy and strategy across new authorities. Potential consequences include loss of economies of scale in managing large service portfolios, duplication of assurance and compliance functions currently provided centrally, increased exposure to demand peaks currently managed through flexible countywide deployment, and delivery risk against DfT Bus Grant conditions that maintain bus budgets over 2026/27–2029/30.

Interdependencies

- Public Transport Business Team for finance, supplier management, contract compliance, and safeguarding
- KCC's Contact Centre, Legal Services, Transportation's Major Capital Projects
- CYPE for school transport eligibility and budget; ASCH budgets
- Contract providers for: concessionary reimbursement calculations, concessionary travel systems/passes, bus stop infrastructure, bus subsidy, and school transport; DfT Bus grant for funding conditions

Next Steps/ Actions

Now
Map contract expiries against the transition timeline and determine how they will be managed, novated or transferred to new unitaries.

Next
Confirm minimum viable specialist workforce given evidenced recruitment scarcity.

Future
Preserve network coherence (e.g. through bus policy consistency), DfT Bus Grant compliance, and safeguarding oversight.

Table of Contents – GET – Highways and Transportation: Transportation

2 GET

2.12 Highways and Transportation: Transportation

2.12.1 Active Travel

2.12.2 Major Capital Projects

2.12.3 Road Safety

2.12.4 Traffic Management

2.12.5 Traffic Operations and Technology

Return to table of
contents

Scope:
Within KCC's Highways and Transportation division, the Active Travel service leads and delivers walking, wheeling and cycling infrastructure and behaviour change activity across Kent. It designs and plans schemes through countywide and local Cycling and Walking Infrastructure Plans, leads KCC's Active Travel Strategy, delivers cycle and pedestrian training, and operates School Road Crossing Patrols. It is delivered through c.40 FTE plus 27 instructors.

Does Disaggregation by default apply to this service? Yes

Why?
Disaggregation by default applies. Local delivery - scheme construction, community engagement, school activity and behaviour change programmes - could be organised on a unitary footprint; assets are portable, systems non-bespoke, and no legislation prescribes a countywide service. However, central functions, such as network analysis, programme prioritisation, strategic policy and DfT/Active Travel England funding compliance would need replicating, sharing or retaining.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.12.1 Active Travel

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Delivery is centrally coordinated and functionally organised (infrastructure development, behaviour change activity, schools and training, engagement and monitoring) with flexible countywide deployment, where response is orientated to funding criteria, scheme readiness and associated risks, rather than geographic allocation. Staffing information evidences specialist capability, such as in transport planning, active travel design, funding assurance and programme management. Budget complexity arises primarily due to its externally funded nature, which includes ringfenced grants from Department for Transport and Active Travel England (capital and revenue), alongside Local Transport Plan/Local Transport Grant funding. The service has no significant income generation, and therefore funding is dependent on negotiations with public grant dispensing bodies. Legislative complexity comes from the mixed statutory (highway, network management, road safety, equality and accessibility duties) and discretionary character of the service and the influence of national policy and funding assurance regimes rather than a hard statutory geography.

What are the potential risks of disaggregation that need to be considered?
These include the potential loss of strategic coherence, specialist capability and funding assurance if the service is fully separated. Disaggregation could make it harder to sustain a critical mass of specialist skills, weaken the ability to meet external assurance requirements, and create risks to network continuity, standards, value for money and cross-boundary coordination. The evidence also indicates that full separation could lead to divergence in design standards and weaken future funding submissions, create inconsistent monitoring arrangements, and reduce the ability to satisfy Active Travel England and DfT requirements. Workforce resilience is a further concern: given national skills shortages in areas such as transport planning and active travel design, disaggregation could reduce the ability to share expertise and maintain specialist capacity across the successor authorities. There is also a financial re-baselining consequence: the budget is not allocated on a district basis, as spending varies according to factors such as need and readiness; there is no existing baseline that can be divided between successor authorities. However, there are also opportunities for greater local responsiveness and alignment with place-based priorities where local capacity exists.

Interdependencies

- Highways & Transportation (operations, network & asset management), Road Safety (shared safeguarding & operational arrangements), Public Rights of Way (infrastructure/route planning coordination)
- Education for schools' interface (Bikeability/crossing patrols) and Public Health/NHS (health & wellbeing initiatives joint work/alignment)
- DfT and Active Travel England ringfenced grant funders
- Districts (planning), Medway (cross-boundary coordination), Kent Police (speed & safety), HTMC contractors (construction delivery)

Next Steps/ Actions

Now
Map specialist and senior roles against successor authority capacity, and decide whether central functions are replicated, shared or retained centrally.

Next
Confirm countywide/framework contracts and novation options aligned to funding cycle, and how ringfenced DfT/Active Travel England funding conditions are met across successor authorities.

Future
Sustain specialist capability, consistent design standards and cross-boundary coordination across authorities.

Scope:
Within Highways and Transportation, Major Capital Projects leads development and delivery of high-value transport schemes typically exceeding £3 million, spanning design, statutory processes, procurement and construction. Schemes include A229 Blue Bell Hill and North Thanet Link Road. Its Transport Strategy Team holds statutory Local Transport Plan leadership. Delivered in-house by 24.3 FTE.

Does Disaggregation by default apply to this service? Yes

Why?
There is no reason the service is unsuitable for disaggregation by default, capital is allocated scheme-by-scheme and varies geographically, so discrete projects could, in principle, transfer to successors. The recommendation is conditional: factors such as a pooled specialist workforce, uneven funding-driven demand, £141.3m of live contracts and the statutory Local Transport Plan role need mitigation. Transport Strategy is a potential Strategic Authority candidate.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.12.2 Major Capital Projects

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Demand is uneven and driven more by funding criteria and network constraints than population distribution, e.g. the A229 Blue Bell Hill scheme is valued at over £250m and could span more than one successor unitary area. Current funding criteria has also led to investment being concentrated in East and North Kent. The delivery model is countywide and centrally coordinated, with specialist staff deployed across schemes covering business case development, civil engineering, project management, land acquisition, planning and ecology. Transport Strategy expertise, including strategic roads, rail and aviation, is concentrated within a small specialist team. Workforce complexity is increased by an ageing staff profile, difficulties recruiting chartered Civil Engineer project managers, and salary competition from London and the private sector. Additional professional requirements, including NEC accreditation and CSCS certification, further reflect the specialist nature of the workforce. Legislative complexity arises from the statutory Local Transport Plan duty. Under a Strategic Authority model, responsibility would transfer to that level. Under a unitary model, each authority would need to assume Local Transport Authority responsibilities and develop its own plan, requiring careful transition particularly regarding assets, schemes and strategic corridors that cross authority boundaries.

What are the potential risks of disaggregation that need to be considered?
Disaggregation could reduce the flexibility to deploy specialist resources across a fluctuating programme, leading to uneven workloads, reduced access to expertise, duplication of scarce skills and increased reliance on consultants. It could also weaken bidding capability, strategic oversight and governance of schemes that span multiple authority areas. Fragmentation of Transport Strategy presents a particular risk, potentially reducing Kent's ability to present a coherent position to national partners on strategic roads, rail, aviation and key corridors. Significant contractual complexity would also arise. Countywide consultancy, legal, modelling and construction contracts would need to be novated, separated or managed through joint governance arrangements. Cross-boundary schemes may require temporary hosted arrangements or phased transfer to protect funding conditions, delivery continuity and contractual obligations. Economies of scale in procurement and supplier management could also be reduced.

Interdependencies

- KCC services such as Procurement, Infrastructure, Planning, Legal, Finance, Highways Asset Management
- Shared assets with other H&T services: plotter and AutoCAD
- Delivering schemes for District Councils;
- National Highways, DfT, Homes England, Network Rail, train operators, TfSE, Port of Dover, Eurotunnel, neighbouring Local Transport Authorities
- Extensive countywide contract portfolio and external capital funding streams

Next Steps/ Actions

Now
Map live scheme geographies against potential successor authority footprints.

Next
Plan novation for contracts and consultancy frameworks, including £141.3m of live construction contracts.

Future
Decide Local Transport Plan allocation and whether Transport Strategy joins a Strategic Authority.

Scope:
Within KCC's Highways and Transportation division, the Road Safety service is a statutory function delivering highway safety, the Vision Zero strategy, driver education and behaviour change activity across Kent. It delivers sub-£3m highway improvement schemes through East and West teams, supports Parish Councils' Highways Improvement Plans, and uses data and intelligence to target evidence-based road safety interventions. Delivered through c.64.43 FTE.

Does Disaggregation by default apply to this service? Part

Why
The Kent Driver Education team should remain a countywide operation due to its business model. The rest of the Road Safety service can be disaggregated: legislation prescribes no delivery geography and elements already operate through place-based delivery. However, targeted exceptions and transitional/shared arrangements would be required for scale-sensitive centralised functions, the specialist workforce, countywide contracts, integrated systems, statutory safeguarding accountability. Countywide partnerships would remain intact and require revised membership and transitional governance.

2.12.3 Road Safety

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Demand is countywide but uneven. Higher volume and complexity are evident in several districts. These pressures are driven by collision risk, growth, development pressures and casualty history, rather than by population alone. The delivery model is hybrid and involves a mix of in-house provision, commissioned activity and partnership working via the Kent & Medway Safer Roads Partnership and the Kent & Medway Safety Camera Partnership. The service combines East and West Highway Improvement Teams alongside countywide specialist functions, including collision data analysis, programme development and prioritisation, design assurance, Vision Zero governance, behavioural change design and quality assurance. It also includes the Kent Driver Education team operating under an MOU with Kent Police to provide enforcement education activity to c.50,000 clients annually. Staffing complexity reflects a highly qualified specialist workforce. Budget complexity reflects its varied sources: funding is largely sourced through external grants, variable developer and parish funding, and recharges from capital budgets. Assets and systems complexity reflects the breadth of specialist platforms used by the service, including collision and risk analysis software systems. Legislative complexity spans several statutory and regulatory duties.

What are the potential risks of disaggregation that need to be considered?
Disaggregation risks reducing the effectiveness and consistency of road safety delivery through fragmentation of specialist expertise, Vision Zero leadership, countywide programmes and partnership arrangements. Delivery resilience could be weakened by workforce shortages and challenges in maintaining critical mass across multiple authorities. The Kent Driver Education service is particularly scale-sensitive: disaggregation could undermine its operating model, complicate course-provider accreditation and place at risk funding currently reinvested in road safety activity. Wider service transitional costs, contract fragmentation, duplication of systems, governance changes and loss of economies of scale may further reduce efficiency and increase overheads. There is also a risk of reduced consistency in prioritisation, programme delivery, performance management and evidence-led interventions across the network, limiting the ability to target resources effectively where need is greatest and to respond consistently to emerging risks.

Interdependencies

- Highways asset and network management teams, traffic management and transport planning teams
- Public Health, Education, Public Transport, Active Travel alignment
- Kent Police, Kent & Medway Safer Roads Partnership, Kent & Medway Safety Camera Partnership
- DfT, National Highways; countywide contracts e.g. HTMC and Road Safety Audit contracts

Next Steps/ Actions

Now
Clarify values, durations and break clauses for countywide contracts.

Next
Map specialist accredited workforce against successor capacity; assess system licensing implications; determine future model for Kent Driver Education in conjunction with Kent Police.

Future
Preserve Vision Zero direction, specialist critical mass and consistent intervention standards, and agree future partnership arrangements.

Scope:
Traffic Management discharges KCC's statutory duties under the Traffic Management Act 2004, setting policy, guidance and governance for the highway network through the adopted Network Management Plan. It oversees civil enforcement of moving traffic offences, works with districts for parking enforcement, maintains the Kent Traffic Model for network appraisal, and plans EV charging infrastructure through its Network Innovations function. Delivery is countywide and hybrid.

Does Disaggregation by default apply to this service? Yes

Why?
No strong whole-service reason prevents disaggregation by default. Legislation prescribes no geographic model, and demand varies by district, issue and project. Therefore, activity could be configured on an area-based footing, subject to retained common policy, legal processes and system controls. However, limited, targeted exceptions, sequencing or transitional/shared arrangements would be required to maintain statutory compliance and service continuity.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.12.4 Traffic Management

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
All six drivers are rated Amber, and complexity arises from their interaction rather than any single factor. Legislative and delivery complexity centre on the statutory Network Management Duty and the requirement for each highway authority to appoint a Traffic Manager, alongside legally prescribed Traffic Regulation Order (TRO) and Moving Traffic Enforcement processes that demand continuity, specialist expertise and robust governance. The delivery model is countywide and hybrid, with long term countywide contracts and several scale-dependent functions, notably the Kent Traffic Model managed by a single FTE under a custodial contract to 2031. Staffing complexity reflects a small, highly senior and specialist workforce, niche-skill recruitment challenges and several senior staff near retirement. Assets/systems complexity stems from specialist, contract-provided platforms integral to statutory compliance and revenue, with licensing, certification and information governance dependencies and shared district and Medway access. Budget complexity arises because several posts are funded directly through income streams while capital funding is heavily grant-based and bound by government MOUs.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies the need to maintain the statutory Network Management Duty at all times as a primary risk, with fragmentation potentially affecting consistency and increasing compliance risk. A loss of countywide coordination with neighbouring authorities and National Highways, and duplication and inefficiency in regional and national representation are also highlighted. Recruitment and skills shortages would be exacerbated by disaggregation given the small, senior and specialist workforce, with duplication of expertise across authorities reducing resilience and increasing cost. Countywide platforms and long-term contracts would face novation, certification, data-migration and information-governance challenges, and the assessment notes systems would need to operate from Day 1 to preserve business continuity. Viability risk to countywide EV contracts and income-generating projects is explicitly flagged, particularly for less commercially viable areas dependent on subsidy or countywide procurement scale. However, the assessment also identifies an opportunity for consolidation and improvement of parking management including alignment to the future delivery of Moving Traffic Enforcement.

Interdependencies

- Legal Services for sealing TROs and agreements, Highways teams for scheme delivery and enforcement site identification, Public Transport for the Bus Service Improvement Plan
- Districts for parking enforcement; Medway for traffic model access and enforcement liaison
- National Highways, police, utilities, developers and EV operators
- Income-funded posts and long-term countywide contracts

Next Steps/ Actions

Now
Assess feasibility of novating or sharing Local Electric Vehicle Infrastructure (LEVI), Jacobs and Marston's contracts.

Next
Plan transitional hosting to maintain Day 1 statutory compliance including confirming arrangements for statutory Network Management Duty and Traffic Manager functions, and address workforce risks.

Future
Design a sustainable operating model preserving scale, specialist expertise, and cross-boundary coordination and representation.

Scope:
Traffic Operations and Technology designs, operated and maintains Kent's Intelligent Traffic Systems, including traffic signals, electronic signs and CCTV. Through the Traffic Operations Centre it provides real-time network monitoring, incident coordination, information sharing and signal optimisation, while managing maintenance contracts, equipment renewal and delivery of new traffic signal schemes

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies: legislation prescribes no delivery geography and demand varies by district and project rather than being indivisible; no whole-service hard constraint is identified. However, scale-sensitive and specialist components, e.g. the Traffic Operations Centre, live network operations, the statutory Network Management Duty functions, and specialist systems and countywide contracts would require transitional or shared arrangements.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

2.12.5 Traffic Operations & Technology

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is spread across five Amber-rated drivers. Demand is asset-led and geographically uneven, with Maidstone identified as the most complex where the Kent network interfaces with National Highways; each asset is individually designed and configured with site-specific control strategies. Delivery is a single countywide team based at Aylesford Highway Depot with no locality-based teams, and the assessment notes the limited number of staff with required specialist skills prevents regional splitting. Staffing complexity reflects a small specialist workforce of 12.5 FTE in post, sector-wide skills shortages, long training lead times, and no equivalent expertise in district or borough councils. Budget complexity is centrally held as the budgets are managed on a countywide basis and expenditure is driven by asset density and externally funded schemes rather than geographic allocation. Assets and systems complexity is driven by reliance on a single Traffic Operations Centre supported by tightly integrated systems which could have an estimated £500,000+ relocation cost, while contracts for maintenance, systems and communication are all countywide and long-term. What are the potential risks of disaggregation that need to be considered? The assessment identified the most significant risks as the ability to recruit sufficient skilled staff, maintain a Traffic Operations Centre operating on a 12-hour shift basis, disaggregate existing systems and specialist skills, and preserve the strategic operation of the service across a wide area. It also identified the need to maintain consistent design and safety standards, and to manage the cost of purchasing, implementing and operating core systems under any future model. The evidence indicates that full separation would create risks to statutory Network Management Duty outcomes if integrated traffic control monitoring systems are split. It would also require consideration of whether and how to replicate the Traffic Operations Centre facility and associated specialist systems, with an estimated relocation cost exceeding £500,000. Workforce resilience is a further concern: fragmentation could reduce operational resilience and make it harder to sustain the specialist capacity required for live network management. There are also significant contractual risks: long-term countywide arrangements including central system contracts would need to be managed through novation, phased separation, shared governance or retained arrangements to avoid service disruption.

Interdependencies
• KCC Streetworks, Highways Operations and Road and Footway Asset Team (RaFAT) for coordinated network delivery • Aylesford Highway Depot including the Traffic Operations Centre; Kent Highways communications channels • National Highways, Kent Police, emergency services, Eurotunnel, Port of Dover, Medway Council • Multiple suppliers and contractors e.g. for term maintenance, central traffic management control systems and assets
Next Steps/ Actions
Now Map specialist workforce against successor authority capacity; decide Traffic Operations Centre arrangements and quantify replication/relocation costs. Next Confirm contract novation and system licensing for Urban Traffic Control (UTC)/Urban Traffic Management Control (UTMC) platforms and countywide contracts; confirm arrangements for statutory Network Management Duty functions. Future Sustain integrated UTC/UTMC control and the Traffic Operations Centre to meet statutory duties.

Table of Contents – ASCH

Kent County Council – Divisional Groupings · click any entry to open its slide

3 ASCH

3.1 Long Term Support

[3.1.1 Approved Mental Health Professional Services \(AMHP\)](#)

[3.1.2 Area Team – Ashford and Canterbury](#)

[3.1.3 Area Team – North Kent](#)

[3.1.4 Area Team – Thanet and South Kent Coast](#)

[3.1.5 Area Team – West Kent](#)

[3.1.6 Continuing Health Care Team](#)

[3.1.7 Direct Payments Team](#)

[3.1.8 Mental Health Forensic and Early Discharge Planning](#)

[3.1.9 Operational Support Services](#)

[3.1.10 Prevent and Serious Organised Crime](#)

[3.1.11 Young Peoples Teams](#)

3.2 Short Term Support

[3.2.1 Adult Short Break Services](#)

[3.2.2 Adult Social Care Connect](#)

[3.2.3 Adults Sensory Services](#)

[3.2.4 Blue Badge Service \(including Mobility Assessors\)](#)

[3.2.5 Community Day Services](#)

[3.2.6 Kent Enablement at Home \(KEaH\)](#)

[3.2.7 Kent Enablement Services](#)

[3.2.8 Occupational Therapy Service](#)

[3.2.9 Performance](#)

[3.2.10 Quality Assurance](#)

[3.2.11 Shared Lives](#)

[3.2.12 Short Stay Services/Integrated Care Centres](#)

[3.2.13 Short Term Pathways](#)

[3.2.14 Strategic Safeguarding Unit](#)

[3.2.15 Strategic Safeguarding, Policy, Practice and Quality Assurance \(Excl. Strategic Safeguarding Unit\)](#)

[3.2.16 Technical Service](#)

[3.2.17 The Deprivation of Liberty Safeguards Service \(DOLS\)](#)

3.3 Commissioning (ASCH)

[3.3.1 ASCH Commissioning Staffing \(Prevention, Living and Ageing Well and Assurance\) – Brokerage and Technology Enabled Lives](#)

3.4 Business Support (ASCH)

[3.4.1 Business Support Unit](#)

[3.4.2 Mosaic Provider Portal](#)

[3.4.3 Systems](#)

Table of Contents – Long Term Support (ASCH)

Kent County Council – Divisional Groupings · click any entry to open its slide

3 ASCH

3.1 Long Term Support

[3.1.1 Approved Mental Health Professional Services \(AMHP\)](#)

[3.1.2 Area Team – Ashford and Canterbury](#)

[3.1.3 Area Team – North Kent](#)

[3.1.4 Area Team – Thanet and South Kent Coast](#)

[3.1.5 Area Team – West Kent](#)

[3.1.6 Continuing Health Care Team](#)

[3.1.7 Direct Payments Team](#)

[3.1.8 Mental Health Forensic and Early Discharge Planning](#)

[3.1.9 Operational Support Services](#)

[3.1.10 Prevent and Serious Organised Crime](#)

[3.1.11 Young Peoples Teams](#)

page 199

Return to table of
contents

Scope:
Within ASCH Long Term Support, the AMHP Service is a 24-hour countywide statutory service coordinating and undertaking Mental Health Act assessments for children and adults in acute mental health crisis where compulsory intervention may be required. It also provides Medway's out-of-hours cover. Delivered in-house through 30.5 FTE.

Page 200
Does Disaggregation by default apply to this service? Part
Why?

The core AMHP crisis-response function should remain countywide because statutory accountability, shift coordination, out-of-hours coverage and scarce specialist workforce capacity depend on a centralised model. Only planned locality activity should be considered for targeted disaggregation. The recommendation is to retain the core statutory service centrally.

3.1.1 Approved Mental Health Professional Services (AMHP)

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the Demand, Delivery Model, Staffing and Legislative drivers. Demand is continuous, urgent and countywide (3,620 assessments in 2024/25, with 947 East, 790 West, 417 North and 150 Medway from named hospital sites), arising in acute hospitals, mental health units, places of safety, police custody and community settings, driven by physical location at time of assessment rather than residence. Delivery is a single countywide hub-and-spoke model with one shift coordinator, RAG-based deployment, permanent-relief AMHPs, cold-call arrangements and formal Medway out-of-hours cover; a centralised QA framework (annual portfolios, peer review, five-year reapproval panels chaired by the Assistant Director) is essential to statutory compliance. Staffing complexity reflects Kent's comparatively low AMHP workforce relative to population need, a five-year minimum training pathway (three-year degree, two years' practice, one academic year at Level 7), an ageing workforce, and market retention challenges given proximity to London. Assets/Systems complexity includes Mosaic, KMMH Rio and S12 Solutions dependencies plus lone-working devices, smartcard readers, mobile printers and partner-provided workspace at St Martins Hospital. Legislative complexity spans MHA physical-location responsibility, vicarious liability, warranting and reapproval duties, and forthcoming staged implementation of the Mental Health Act 2025 requiring specialist retraining.

What are the potential risks of disaggregation that need to be considered?
Consequences directly evidenced include sub-critical local AMHP teams that cannot flex to risk; loss of centralised QA including audits, direct observation and action plans following practice concerns; loss of long-term project benefits, including improvements in Section 136 pathways, support for Nearest Relative arrangements, and more efficient transport arrangements for Mental Health Act assessments; ambiguity around vicarious liability and warranting where AMHPs act across boundaries; and financial and legal exposure from statutory challenge. The Medway out-of-hours arrangement demonstrates shared cross-boundary provision is already operationally necessary.

Interdependencies

- Locality teams contribute mixed-role AMHPs to the rota
- Invicta Law, KCC Learning and Development, Practice Development
- Kent and Medway MH NHS Trust systems and sites
- Medway Council out-of-hours MOU; Kent Police, secure transport

Next Steps/ Actions

Now
Map the AMHP workforce and training pipeline across successor authorities.

Next
Sequence transition against Mental Health Act 2025 staged implementation and system access.

Future
Sustain a single countywide rota, coordination and quality assurance with clear liability.

Scope:
Ashford and Canterbury Community Services delivers KCC's statutory Adult Social Care and safeguarding duties across Ashford, Canterbury, Whitstable, Herne Bay and Faversham. It undertakes Care Act assessments, safeguarding enquiries and support planning under the Care Act, MCA and MHA. Delivered in-house through four community teams and a safeguarding team.

Does Disaggregation by default apply to this service? Yes

Why?

The service already runs through four aligned locality teams and a safeguarding team, a natural basis for separation. Statutory Care Act, MCA and MHA duties transfer with population and geography, with no prescribed footprint or hard constraints. The 134.4 FTE workforce is distributable; central ASC functions, contracts and specialist roles are transitional considerations, not barriers.

3.1.2 Ashford & Canterbury Area

Covering: A&C Community Safeguarding Team, Ashford Community Team (CT), Canterbury CT, Faversham CT, Whitstable CT

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is unevenly distributed: Canterbury faces higher complexity from its city profile, two large university sites, homelessness, substance misuse and an acute mental health hospital; Ashford carries additional safeguarding demand linked to a major hospital site and ordinary residence issues following admission; and coastal areas (Whitstable, Herne Bay) show higher residential and nursing placement volumes with poorer population health. The delivery model, though area-based, relies on centralised ASC functions (business support, ASC finance, DoLS, AMHP and commissioning), a single Ashford and Canterbury safeguarding team and countywide commissioning contracts whose values, suppliers, geography and end dates will need to be understood. Budget complexity arises from incomplete 2026/27 figures, undefined MTFP commitments, multiple funding sources (grants, Better Care Fund, client charging), team-level budgets managed on an area basis, and geographic variation in income and debt linked to deprivation. What are the potential risks of disaggregation that need to be considered? The principal risk is maintaining the safe, lawful and effective delivery of adult social care responsibilities while preserving service continuity across new organisational boundaries. Dependencies on centralised functions like DoLS, AMHP, commissioning and business support would require replication, shared services or phased separation during transition. Workforce consequences are material, given sector-wide shortages in AMHPs, Best Interest Assessors and Practice Educators. There is also longstanding difficulty recruiting registered social workers, nurses and occupational therapists across Kent. Each successor authority would need sufficient specialist capacity to fulfil statutory duties from Day 1. Countywide contracts for residential and nursing care, supported living, day opportunities and equipment would require novation, assignment or recommissioning. Cross-boundary operational dependencies with NHS partners (hospital discharge, admission prevention, mental health and learning disability services), police (statutory safeguarding), district councils (housing and homelessness) and Public Health would need structured collaboration or transitional arrangements. Financial and contractual evidence is required to understand affordability and contract consequences.

Interdependencies
- Centralised ASC functions: DoLS, AMHP, commissioning, business support - Single Ashford and Canterbury safeguarding team across localities - NHS, police, district councils for discharge, safeguarding, housing - Countywide care contracts; Mosaic case management systems
Next Steps/ Actions
Now Confirm the geographic split, demand distribution, budgets and staffing allocations across the Ashford and Canterbury footprint. Next Develop transition arrangements for safeguarding provision, shared ASC functions, countywide contracts and hospital-related pathways. Future Sustain safe, lawful statutory delivery and retain specialist capacity across new boundaries.



Scope:
North Kent Area delivers KCC's statutory Adult Social Care and safeguarding services across Dartford, Gravesham, Sittingbourne, Sheppey and Swanley. It undertakes Care Act assessments, safeguarding enquiries and support planning under the Care Act, MCA and MHA. Delivered through five teams and a North Kent-wide safeguarding team, covering three Sheppey prisons.

Does Disaggregation by default apply to this service? Yes

Why?

North Kent already operates through five aligned teams and a North Kent-wide safeguarding team. Statutory Care Act, MCA and MHA duties transfer with population and geography, with no prescribed footprint and no hard constraints; the 141.1 FTE workforce is distributable. Central functions, contracts, Sheppey prison responsibility and cross-border London placements are significant accountability considerations, not barriers.

3.1.3 North Kent Area

Covering: NK Community Safeguarding Team, Dartford CT, Gravesham CT, Sittingbourne CT, Sheppey CT, Swanley CT and Prisons Team

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in the three Amber-rated drivers. Demand is unevenly distributed, with higher volumes in urban Dartford and Gravesend, distinct pressures in coastal Sheppey and Sittingbourne, cross-border placements from London boroughs, and a specific prison-related demand on Sheppey covering Elmley, Standford Hill and Swaleside. The delivery model, though geographically structured, relies on centralised ASC functions (business support, ASC finance, DoLS, AMHP and commissioning), a North Kent-wide safeguarding team and countywide commissioning contracts whose values, suppliers, geography and end dates need to be understood. Budget complexity arises from incomplete 2026/27 figures, multiple funding sources (grants, Better Care Fund, client charging income), area-based management of team-level budgets, and geographic variation in income and debt linked to deprivation. These factors add implementation complexity and require baselining and planning, without in themselves preventing disaggregation.
What are the potential risks of disaggregation that need to be considered? The principal risk is maintaining the safe, lawful and effective delivery of adult social care responsibilities while preserving service continuity across new organisational boundaries. Centralised functions (DoLS, AMHP, commissioning, business support) would need to be replicated or delivered through shared arrangements during transition, and the North Kent-wide safeguarding team would need to be divided or reconfigured if the area is split. Workforce consequences are material given existing recruitment challenges and higher turnover driven by competition from neighbouring London boroughs; disaggregation into smaller units could exacerbate recruitment challenges. Countywide contracts for residential care, supported living, day opportunities and equipment would require novation, assignment or recommissioning, and clear accountability and funding arrangements would need to be established for cross-border placements and prison-related responsibility on Sheppey.

Interdependencies
- Centralised ASC functions: DoLS, AMHP, commissioning, business support - NHS, police, district councils for discharge, safeguarding, housing - Countywide care contracts; Mosaic systems; Sheppey prisons, London placements
Next Steps/ Actions
Now Confirm the geographic split, demand distribution, budgets and staffing allocations, including prison and cross-border placement responsibilities. Next Develop transition arrangements for safeguarding provision, shared ASC functions, contracts and prison-related responsibilities. Future Sustain safe, lawful delivery and retain AMHP and Best Interest Assessor capacity.

Scope:
Within ASCH's Long Term Support division, KCC's Thanet and South Kent Coast Community Teams deliver statutory adult social care and safeguarding across Thanet, Dover, and Folkestone and Hythe. Supporting around 6,000 people, they undertake Care Act assessments, safeguarding enquiries and support planning under the Care Act, MCA and MHA.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies. No whole-service hard constraint exists; delivery already runs through three geographically aligned Community Teams supported by a TSKC wide Safeguarding Team. Staffing and budgets sit at area level, and no legislation constrains geography. Complexity is relational - sustained high demand, coastal deprivation, complex needs and out-of-area placements - needing active management, not a barrier.

3.1.4 Thanet and South Kent Coast

Covering: TSKC Community Safeguarding Team, Thanet Community Teams 1 and 2, Dover CT 1 and 2, Folkestone and Hythe CT 1 and 2

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the three Amber-rated drivers: Demand, Delivery Model and Budget. Demand is among the highest in Kent across contacts, assessments, service commencements, care and support plan reviews and safeguarding activity, driven by coastal deprivation and a higher prevalence of learning disability, autism and mental ill-health. Delivery is a locality-based in-house model with three Community Teams (Dover, Folkestone and Hythe, and Thanet) and a Community Safeguarding Team, reliant on centralised ASC functions including business support, arranging support, ASC finance, Deprivation of Liberty Safeguards, AMHP services and commissioning, and on partnerships with NHS, police and district councils. Budget complexity reflects £9.6m staffing spend in 2025/26 and approximately £200m non-staffing spend, including care packages, as well as income and debt variation linked to deprivation. Financial complexity is further shaped by directorate-level savings targets delivered through practice across all community teams, including first reviews , reductions in residential and nursing placements , and a review of embedded teams in ASC. Staffing (Green) is a supporting rather than complexity driver, but recruitment for registered social workers, nurses, occupational therapists, AMHPs, Best Interest Assessors and Practice Educators is described as particularly acute in this geography due to housing costs and distance from London.

What are the potential risks of disaggregation that need to be considered?
The most significant risk is maintaining the safe, lawful and effective delivery of adult social care responsibilities following disaggregation, particularly given the area's demographic profile, high levels of need and the complexity associated with people placed into the area from elsewhere in Kent. Without countywide commissioning, there is a risk that services will continue to be utilised in areas outside unitaries based on the availability of accommodation and cost reduction opportunities. Recruitment challenges for regulated and specialist staff, described as particularly acute in this geography, would need to be actively managed through any transition. Sustained financial pressure driven by high volumes of complex care packages, out-of-area placements and client debt would also need to be managed, alongside continuity of statutory Care Act, MCA, MHA and safeguarding duties.

Interdependencies

- Central ASC functions: business support, DoLS, AMHP, finance, commissioning
- Countywide ASC contracts: non-residential, residential, nursing, supported living, equipment
- NHS partners for hospital discharge and mental health services
- Kent Police and district councils for safeguarding and housing

Next Steps/ Actions

Now
Confirm demand distribution, budgets and staffing allocations, including the impact of deprivation and out-of-area placements across the footprint.

Next
Develop transition arrangements for shared ASC functions, countywide contracts, partnership pathways and cross-boundary placements.

Future
Sustain safe, legal delivery and manage deprivation-driven demand and out-of-area placement pressures.

Scope:
Within ASCH Long Term Support, KCC's West Kent Area Teams delivers statutory adult social care and safeguarding across Maidstone, Sevenoaks, Tonbridge and Malling, and Tunbridge Wells. It undertakes Care Act assessments, safeguarding enquiries and person-centred support planning, supporting 4,350 people in receipt of care and support.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. Delivery already runs through locality-aligned Community Teams, budgets are identifiable at team level, and no legislative or asset constraints exist. Complexity is demand, market and finance driven—4,350 people, high residential costs exceeding £1,500 weekly, 46% non-contracted home care, and reliance on centralised ASC functions—all transition considerations.

3.1.5 West Kent Area

Covering: WK Community Safeguarding Team, Maidstone East Community team, Maidstone West CT, Sevenoaks CT, Tonbridge and Malling CT, Tunbridge Wells CT

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is driven primarily by demographic demand, local care market pressures and reliance on shared ASC functions and countywide arrangements. West Kent serves a diverse population across affluent towns, rural and commuter communities, alongside pockets of deprivation, with demand shaped by ageing, frailty, dementia, multi-morbidity and substance misuse. Delivery relies on a range of centralised ASC functions, including AMHP, Operational Support, Continuing Healthcare, Direct Payments, Arranging Support and Complaints services, together with countywide contracts for residential and nursing provision, supported living, day opportunities and equipment. Local care market conditions add complexity, including high residential care costs and significant reliance on non-contracted home care. Budget complexity is increased by multiple funding streams, variation in income and debt linked to deprivation, and incomplete 2026/27 budget information. Staffing, Assets/Systems and Legislative basis are not primary complexity drivers, although recruitment and retention remain challenging across the adult social care workforce across key professional and specialist roles. In West Kent, these challenges are influenced by geography, relatively high housing costs and proximity to London and surrounding counties. What are the potential risks of disaggregation that need to be considered? The principal risk is maintaining the safe, lawful and effective delivery of adult social care responsibilities while preserving service continuity across new organisational boundaries. The service remains dependent on centralised ASC functions, countywide commissioning arrangements and partnerships with health, police and district councils that would need to be reviewed under any successor authority model. Local care market pressures could be intensified if residential care purchasing and home care commissioning are undertaken at a smaller scale, particularly given existing reliance on non-contracted home care and relatively high residential placement costs. Workforce risks include sustaining recruitment and retention of registered social workers, nurses, occupational therapists and specialist statutory roles such as AMHPs, Best Interests Assessors and Practice Educators. Existing service debt, waiting lists and countywide contract arrangements would require clear decisions during transition.

Interdependencies
- Centralised ASC functions: AMHP, CHC, Direct Payments, Arranging Support - Countywide ASC contracts: non-residential, residential, nursing, supported living, equipment - Health partners for discharge and mental health services - Kent Police and district councils for safeguarding and housing
Next Steps/ Actions
Now Confirm demand distribution, budgets and staffing allocations, alongside countywide contract dependencies and future footprint alignment. Next Develop transition arrangements for shared ASC functions, countywide contracts, care-market arrangements and cross-boundary service dependencies. Future Sustain safe, legal delivery, manage care-market cost pressures and specialist workforce retention.

Scope:
KCC's Continuing Health Care (CHC) Liaison Team, within Adult Social Care and Health Long Term Support, provides specialist support to adults with complex health-related needs to ensure access to NHS Continuing Health Care or joint funding. It provides CHC pathway oversight, advice and dispute resolution. Delivered in-house through 6 FTE.

Does Disaggregation by default apply to this service? Yes
Why?

There is no reason the service is unsuitable for disaggregation by default. Budget, Assets/Systems and Legislative basis are Green: no specialist buildings, equipment or contracts, and no geographic legislative constraint. Red Staffing and Amber Demand/Delivery ratings reflect a small, regulated workforce with scarce CHC expertise, variable NHS-driven demand, and fundamental interdependence with the Kent and Medway ICB.

3.1.6 Continuing Health Care Team

Complexity Driver RAG Assessment					
Demand (A)	Amber	Delivery Model (A)	Amber	Staffing (R)	Red
Budget (G)	Green	Assets/ Systems (G)	Green	Legislative (G)	Green

Complexity Overview	Interdependencies
What makes this service complex to disaggregate? Demand varies across Kent rather than following a consistent geographic pattern, influenced by locality team capacity, training needs and NHS Integrated Care Board priorities, with increased activity in East Kent linked to ICB savings activity, and CHC processes must be completed within timescales set out in the CHC National Framework (2022). Delivery is fundamentally interdependent with the Kent and Medway ICB: the service's core purpose (support, advice and dispute resolution across the CHC pathway) is delivered jointly with NHS partners, making this external dependency central rather than incidental. Staffing complexity is driven by a small team of 6 FTE, all professionally regulated with HCPC, NMC or Social Work England, and a reported shortage of practitioners with in-depth knowledge and understanding of the CHC National Framework. This concentration of scarce specialist expertise limits resilience and flexibility if the workforce is fragmented across successor authorities. Green ratings for Budget, Assets/Systems and Legislative basis mean these are not complexity drivers, although the assessment notes limited detail on information governance and data-sharing arrangements underpinning joint CHC working with NHS partners.	• Adult Social Care community teams for linked casework • 6 FTE, professionally regulated, specialist CHC National Framework knowledge • Kent and Medway ICB for joint CHC delivery • NHS commissioning priorities influencing demand, notably East Kent
What are the potential risks of disaggregation that need to be considered? The primary consequence-bearing area is Staffing: a workforce of 6 FTE with scarce CHC National Framework expertise offers limited scope for substitution, redeployment or resilience through scale, meaning any loss of staff or dilution of roles could disproportionately affect service continuity, quality and compliance with nationally prescribed timescales. Fragmenting the countywide delivery model could also disrupt continuity of joint working with the Kent and Medway ICB, which is described as intrinsic to CHC processes rather than incidental. Demand variability driven by ICB priorities means workload is influenced by external factors that individual successor authorities may struggle to plan for at a smaller scale. The assessment does not evidence system, contract, budget or legislative risks material to disaggregation	Next Steps/ Actions Now Quantify CHC demand volume, trend and geographic distribution across Kent. Next Clarify information governance and confirm continuity of joint ICB working. Future Sustain CHC National Framework compliance and retain scarce specialist practitioners.

Scope:
Within ASCH's Long Term Support division, KCC's Direct Payments Team enables adults to manage a personal budget to meet their assessed care and support needs. It provides advice and support to set up and use direct payments, meet legal responsibilities, and employ personal assistants. Statutory under the Care Act 2014.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies to the Direct Payments Team. All six drivers are Green with no constraint: demand is consistent and non-specialist, delivery standardised countywide, budget centrally managed within ASC funding, workforce generalist and stable, no specialist assets, and the Care Act 2014 prescribes no geography. Countywide scale efficiencies are a consequence, not a barrier.

3.1.7 Direct Payments Team

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview	Interdependencies
What makes this service complex to disaggregate? All six complexity drivers are Green in the explicit RAG fields, indicating limited inherent barriers. The principal implementation consideration flagged by the assessment is the centralised countywide delivery model, which supports flexible deployment across North Kent, West Kent, TSKC and Ashford and Canterbury and delivers economies of scale for the c.3,195 active direct payments and 657 carer arrangements. Administrative functions (setup of payments, financial processing, helpline, compliance and fraud monitoring) and support functions (advice, PA recruitment and employment support, ongoing monitoring, liaison with Community Teams) are all delivered from a single countywide function. Evidence gaps relating to Mosaic system integration, data sharing and internal interdependencies with Community Teams are noted as requiring further due diligence. What are the potential risks of disaggregation that need to be considered? The assessment identifies the main consequence as loss of the current economy of scale that a countywide operation delivers, allowing resources to be deployed flexibly to where demand is greatest. Beyond this, no material risks are evidenced. The assessment flags a possible integration consequence with Community Teams if organisational structures change, and evidence gaps around Mosaic system access, data migration and continuity of records that would need to be resolved during transition rather than treated as confirmed risks. There is also an evidenced opportunity for closer integration with local teams undertaking care assessments and reviews.	• ASC Community Teams for operational liaison and changing needs • Mosaic system, shared across Adult Social Care • Kent Card purchasing mechanism • ASC safeguarding teams for referral of fund misuse
Next Steps/ Actions	
Now Map Mosaic and Kent Card integration and data-sharing dependencies. Next Plan workforce allocation and confirm budget approach from the countywide budget. Future Balance local integration with retention of countywide scale efficiencies and compliance.	

Scope:
Within Adult Social Care Operations, the Mental Health Forensic and Early Discharge Planning service is a countywide specialist team providing statutory social care oversight for adults in forensic mental health pathways or requiring coordinated discharge from secure, acute or specialist inpatient settings. Delivered in-house through 37 FTE.

Does Disaggregation by default apply to this service? Yes
Why?

Disaggregation by default applies. There is no statutory prohibition, contractual lock-in or single factor making it impossible; legislation prescribes no geographic model and budgets are countywide with no area allocation. However, material consequences need transitional arrangements: pathway continuity versus geographic accountability, costly duplication of Mosaic, RIV and KMCR licences, specialist AMHP and forensic workforce.

3.1.8 Mental Health Forensic and Early Discharge Planning

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in the delivery model and demand, Staffing, Budget and Legislative drivers. Demand is organised around inpatient mental health pathways and individual patient need, including out-of-county ICB-funded placements rather than by where residents live. Delivery is an in-house statutory service operating as an integrator across NHS, justice and public protection systems, with a hub-and-spoke Community Forensic Social Work model providing consultation, audits and upskilling to locality supervisors, plus centralised business support, Social Supervisors' Forums, Practice Assurance Panels and brokerage/placement sourcing. Staffing complexity reflects statutory training and re-warranting requirements (Social Work England registration, mandatory AMHP training with c.9-month qualification, annual forensic supervisor refresher), embedded AMHP capacity to support recall and CTO renewals, and evidenced retention challenges. Budget complexity arises from countywide-held staffing with some posts externally funded on an ongoing basis by the Kent Sussex Surrey Provider Collaborative and Section 117 joint funding with the Kent and Medway ICB. Legislative complexity comes from the fully statutory basis covering forensic supervision, Section 117 aftercare and discharge coordination, alongside Section 42 safeguarding referrals under the Care Act 2014. Assets/Systems is Green overall, but the assessment explicitly flags that duplicating Mosaic, RIV and KMCR licences would be costly.

What are the potential risks of disaggregation that need to be considered?
Risks include loss of specialist forensic expertise and consistency; potential challenges in maintaining current public protection arrangements; disruption to established multi-agency relationships (NHS Trust, ICB, MoJ, MAPPA, Forensic Outreach and Liaison Service, Victim Contact Scheme, secure hospitals); complexity in Section 117 and ordinary residence decision-making; workforce retention and professional identity risks; governance and quality assurance gaps; loss of discharge flow expertise in EDPT; fragmentation of system coordination; increased hospital delays and cost pressures; reduced ability to manage high-complexity cases; and workforce overload in locality teams.

Interdependencies

- KCC locality mental health teams for post-discharge handover
- Countywide budgets; Section 117 joint funding with ICB
- Mosaic with RIV and KMCR (costly to duplicate?)
- Kent and Medway MH NHS Trust, ICB, MoJ, MAPPA

Next Steps/ Actions

Now
Quantify the cost of duplicating Mosaic, RIV and KMCR licences.

Next
Map AMHP and forensic supervisor capacity and sequence multi-agency relationship transitions.

Future
Preserve pathway continuity and specialist forensic capability with sustained multi-agency governance.

Scope:
Within ASCH's Long Term Support division, KCC's Operational Support Service provides practical and administrative support to Adult Social Care. It assists people who have lost capacity to manage finances, preparing Court of Protection deputyship applications, protecting property including pets, and overseeing Temporary Financial Assistance. Statutory under the Care Act.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies. Five of six drivers are Green with no whole-service hard constraint. Demand is countywide and evenly distributed, budget is a small staffing-only allocation, and the Care Act prescribes no geography. The Amber Delivery Model due to the countywide delivery embedded within wider ASCH financial workflows suggests aligning to an ASCH footprint.

3.1.9 Operational Support Services

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in the Delivery Model. Delivery is a fully centralised, in-house countywide function embedded in wider ASCH workflows, including handling of loss of capacity, Court of Protection deputyship applications, property protection, Temporary Financial Assistance and coordination with debt recovery. Interdependencies with ASC Community Teams, the Financial Assessment and Income Unit and Income Recovery mean the service forms part of a broader operational and financial workflow rather than a standalone unit. The workforce is small and the assessment notes rising case complexity linked to self-neglect, hoarding and complex financial situations. The service lead flags that fragmentation could dilute specialist knowledge and result in teams too small to function effectively, and that a centralised team offers greater potential to reduce unsecured debt.
What are the potential risks of disaggregation that need to be considered? The service lead identifies the main consequences as dilution of specialist knowledge in Court of Protection, property protection (including pets) and Temporary Financial Assistance, and teams becoming too small to function effectively. Maintaining a centralised team is described as offering greater potential to reduce unsecured debt to the council. Disaggregating without preserving alignment to ASCH workflows would risk fragmenting integrated processes across Community Teams, the Financial Assessment and Income Unit and Income Recovery, particularly for capacity loss, Temporary Financial Assistance, deprivation cases and debt recovery. No external partner risks are evidenced. Safeguarding responsibilities focused on financial abuse would need to be maintained across any new footprint.

Interdependencies
• ASC Community Teams for operational casework and financial protection functions • Financial Assessment and Income Unit for deprivation and TFA • Income Recovery for debt recovery and reducing unsecured debt • Court of Protection for deputyship applications (external)
Next Steps/ Actions
Now Map operational links with ASC Community Teams and financial services against successor footprints. Next Agree alignment with Community Teams, FAI Unit and Income Recovery, and safeguarding accountability. Future Sustain specialist capability and integrated working to keep reducing unsecured debt.



Scope:
Within ASCH, KCC's CONTEST and Serious and Organised Crime service delivers two statutory functions. Prevent, a safeguarding duty under the Counter-Terrorism and Security Act 2015, leads Channel Panels across Kent and Medway. SOC provides strategic leadership, intelligence, governance and partner coordination on modern slavery, exploitation, fraud and organised crime.

Does Disaggregation by default apply to this service? No

Why?

The CONTEST and Serious Organised Crime function should remain countywide because it depends on a small vetted specialist workforce, single-point accountability and trusted police and safeguarding partnerships. Fragmentation would create sub-critical units and weaken governance. Continued countywide delivery is the clearest recommendation.

3.1.10 Prevent and Serious Organised Crime

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?
Delivery is highly centralised with no locality teams, flexibly deployed by threat and risk, and deeply embedded in multi-agency statutory governance. Staffing is 5 FTE (6 with the currently vacant Assistant Director), all requiring SC and NPPV3 security clearance and specialist safeguarding, counter-terrorism and intelligence expertise, with roles including Prevent and Channel Manager, Prevent Engagement Lead, Prevent Education Public Mental Health Coordinator, SOC Manager, Modern Slavery & Human Trafficking Coordinator and SOC Intelligence Analyst. Demand is countywide but uneven and risk-led, with higher volumes in coastal districts (Dover, Folkestone & Hythe, Thanet), urban areas (Medway, Maidstone) and locations with a UASC presence, where complexity is increasing due to evolving online influences, diverse ideological narratives, and wider social and community factors. Budget complexity arises from mixed funding sources which includes grants from Public Health and the Home Office. Assets/Systems complexity is driven by controlled access to Liberi, Synergy Gateway Mosaic, secure counter-terrorism systems (Knowledge Hub) and intelligence-sharing platforms, all requiring vetting. Legislative complexity spans the Counter-Terrorism and Security Act 2015, Modern Slavery Act 2015, Crime and Disorder Act 1998, and forthcoming reforms including the Crime and Policing Bill (cuckooing and CCE) and Renters' Reform.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies loss of specialist capacity and resilience, workforce and recruitment challenges, reduced consistency in safeguarding and decision-making, fragmentation of partnership working, impact on intelligence and risk management, increased cost and duplication, and loss of Kent's unique position as a Prevent priority area and council with a dedicated SOC function as the primary risks. The assessment reinforces that this is already a minimum-viable team with no capacity to absorb loss or division without direct impact on statutory delivery and safeguarding continuity, and that police and counter-terrorism partners specifically value having a single point of contact. Disaggregation would not divide a large team into smaller viable units but would fragment an already lean function into sub-critical components.

Interdependencies

- KCC CYPE, ASCH, Community Safety, Public Health and safeguarding boards
- Medway Council for cross-boundary Prevent delivery
- Kent Police, CT Policing South East, Home Office, Border Force
- Statutory Channel Panels, Prevent Duty Delivery Board, SOC Boards

Next Steps/ Actions

Now
Consider filling the Assistant Director vacancy and map security-vetted role transfer and access.

Next
Confirm countywide Prevent, Channel and SOC arrangements and Home Office grant treatment.

Future
Preserve a single partner contact, statutory governance and secure intelligence access.

Scope:
Within ASCH's Long Term Support division, KCC's Young People's Service supports young people (typically 17+) with learning or physical disabilities transferring from Children's Disability Services into Adult Social Care. It coordinates planned transfers and progresses Care Act workflows, delivering duties under the Care Act, MCA and MHA and leaving-care requirements.

Does Disaggregation by default apply to this service? Yes
Why?

Disaggregation by default applies. Delivery already runs through four locality-based teams, with staffing and budgets attributed at team level; no legislation mandates geography, and duties under the Care Act, MCA and MHA apply regardless of footprint. Reliance on centralised ASC functions, commissioning and the Children's-to-Adults transition pathway are implementation considerations, not structural barriers.

3.1.11 Young Peoples Teams

Covering: Young People's Team West Kent, North Kent, East Kent, South Kent

Complexity Driver RAG Assessment					
Demand (A)		Delivery Model (A)		Staffing (A)	
Budget (A)		Assets/ Systems (G)		Legislative (A)	

Complexity Overview

What makes this service complex to disaggregate?
Complexity is spread across Demand, Delivery Model, Budget, Staffing and Legislative. Demand is geographically uneven, with the highest volumes in the west of the county and lower volumes in the east, alongside deprivation-linked pressures in coastal communities. The need for support is consistently complex, built around the needs of young people with learning and physical disabilities who typically remain within the service between ages 18 and 26, requiring sustained support and coordinated transition planning. Delivery relies on centralised ASC functions, countywide commissioning arrangements and extensive interdependencies with Children's Services, SEND, Public Health, NHS partners, district councils, police and transport services. A single safeguarding role operates across the four locality-based teams, while continuity of the Children's-to-Adults transition pathway depends on effective multi-agency working across organisational boundaries. Budget complexity is increased by multiple funding streams, including grants, Better Care Fund income and client contributions, alongside provisional 2026/27 budget information and variation in income and debt linked to deprivation. Staffing complexity reflects a workforce of regulated professionals and specialist statutory roles, with recruitment challenges creating additional pressure. Legislative complexity arises from forthcoming changes to the Mental Health Act, Deprivation of Liberty Safeguards, SEND and leaving-care legislation rather than geographic constraints on delivery.

What are the potential risks of disaggregation that need to be considered?
The principal risk is maintaining the safe, lawful and effective delivery of statutory adult social care responsibilities while preserving continuity for young people transitioning from Children's Services into Adult Social Care. The service relies on strong relationships with Children's Services, SEND, health partners and other agencies, and these arrangements would need to be maintained across any successor authority model. Workforce resilience and access to specialist expertise are key considerations. Reliance on specialist commissioned services and countywide care markets may present challenges where demand is insufficient to sustain provision at individual unitary level. Financial uncertainty is increased by unconfirmed 2026/27 budgets and MTFP commitments. Continuity of Care Act, MCA, MHA, safeguarding and leaving-care responsibilities would need to be maintained across successor authorities.

Interdependencies

- Children's Services (CYPE) and SEND for the transition pathway
- Centralised ASC functions: commissioning, finance, AMHP services
- Countywide contracts: residential, nursing, supported living, equipment
- NHS learning disability services; Kent Police; district housing

Next Steps/ Actions

Now
Confirm 2026/27 budgets and clarify demand and cost across the four localities.

Next
Align with Children's Services footprints and map dependencies with SEND, NHS and partners.

Future
Preserve transition-pathway continuity, specialist workforce and equitable provision across differing demand.

Table of Contents – Short Term Support (ASCH)

Kent County Council – Divisional Groupings · click any entry to open its slide

3 ASCH

3.2 Short Term Support

[3.2.1 Adult Short Break Services](#)

[3.2.2 Adult Social Care Connect](#)

[3.2.3 Adults Sensory Services](#)

[3.2.4 Blue Badge Service \(including Mobility Assessors\)](#)

[3.2.5 Community Day Services](#)

[3.2.6 Kent Enablement at Home \(KEaH\)](#)

[3.2.7 Kent Enablement Services](#)

[3.2.8 Occupational Therapy Service](#)

[3.2.9 Performance](#)

[3.2.10 Quality Assurance](#)

[3.2.11 Shared Lives](#)

[3.2.12 Short Stay Services/Integrated Care Centres](#)

[3.2.13 Short Term Pathways](#)

[3.2.14 Strategic Safeguarding Unit](#)

[3.2.15 Strategic Safeguarding, Policy, Practice and Quality Assurance \(Excl. Strategic Safeguarding Unit\)](#)

[3.2.16 Technical Service](#)

[3.2.17 The Deprivation of Liberty Safeguards Service \(DOLS\)](#)

Return to table of
contents

Scope:
Adult Short Break Services provide planned and emergency CQC-registered residential support for adults aged 16+ with ongoing care needs, particularly learning disabilities, autism, physical/sensory impairments and behaviours that challenge. The primary purpose is respite for individuals and unpaid carers, preventing carer breakdown. Statutory where short breaks meet eligible needs.

Does Disaggregation by default apply to this service? Yes

Why?
Disaggregation by default applies. Each of the five services already operates with its own building, budget code, staffing establishment and CQC-registered manager, so core components are separable. Statutory duties sit with the local authority and no legislation prescribes geography. Balancing demand, dependency and workforce across sites is an important implementation consideration.

3.2.1 Adult Short Break Services

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (R)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity concentrates around demand, delivery, staffing and assets. Demand is countywide but uneven, with higher volumes from East Kent (Dover, Canterbury, Swale) and around one-third of placements crossing sub-regional boundaries, largely to accommodate North Kent residents where there is no local provision. Delivery is hybrid: five site-based services operate independently but rely on countywide coordination of placements, CQC nominated individuals and a shared on-call management rota. Staffing operates under a dependency-based model, so vacancies (20 posts open at reporting, with particular pressure at Rusthall) directly reduce usable capacity irrespective of physical beds. Assets are fixed and geographically uneven, with CQC-registered buildings and locally held specialist equipment (hoists, specialist baths, sensory equipment) that cannot easily be redistributed.
What are the potential risks of disaggregation that need to be considered? The main consequence is a potential reduction in the flexibility that currently allows demand, dependency and staffing capacity to be balanced across the five sites, increasing the likelihood of local variations between demand and available capacity. Reduced central coordination could make it more challenging to respond to changes in demand and to place people in the most appropriate provision, particularly for North Kent residents who currently benefit from cross-boundary placements. Because each site has a distinct offer shaped by its facilities, resources and staffing, disaggregation may reduce flexibility in matching people to the provision best suited to their assessed needs. Duplication of overheads is also identified, including CQC registration, compliance and quality assurance arrangements, alongside weaker system-wide oversight of the full short break offer. Safeguarding accountability and regulatory compliance across new organisational boundaries would need to be actively maintained.

Interdependencies
• Referrals from Adult Community Teams and Young People's Teams • Shared CQC nominated individuals, on-call rota, central Business Support • Transition with Children's Short Break Services at age 18 • NHS Summary Care Record • Medway provision for North Kent gap
Next Steps/ Actions
Now Map utilisation, unmet demand, cross-boundary placement flows and dependency-based capacity per site. Next Decide future model for the CQC nominated individuals, on-call rota and coordination. Future Preserve cross-boundary flexibility, safeguarding, CQC compliance and address the North Kent gap.

Scope:
Adult Social Care Connect (ASCC) is KCC's single, countywide front door for information, advice and referrals into Adult Social Care. Delivered in-house through East Kent Connect and West Kent Connect, it supports adults with care needs, carers and referring professionals using a strengths-based model, delivering statutory Care Act 2014 duties.

Does Disaggregation by default apply to this service? Yes
Why?

Disaggregation by default applies. Assets/Systems and Legislative are Green, with no contracts, specialist equipment or geographic legislative requirement. Amber Demand, Delivery and Staffing reflect deprivation-driven demand clustering, reliance on flexible countywide deployment, complex partner interdependencies, and regulated, judgement-based roles—shaping sequencing rather than preventing disaggregation.

3.2.2 Adult Social Care Connect

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is concentrated in three Amber-rated drivers that interact. Demand is broadly consistent between East and West Kent but clusters in areas of higher deprivation and complexity — Thanet, the Isle of Sheppey, Dartford and Gravesham and Maidstone – pressures are currently absorbed by a countywide model that would likely become more acute within smaller units. The delivery model relies on centralised support, mutual on-call cover, and flexible deployment across East and West to manage peaks, absence, and waiting lists as well as interdependencies with other ASC services and external partners including NHS, SECAMB, Police, District and Borough Housing teams, and Voluntary Sector partners. The recent consolidation from four teams to two directly responded to CQC findings on inconsistency, so any split would need to protect that progress. Staffing complexity reflects reliance on Registered Practitioners, Senior Practitioners, Team Managers, and Senior Contact Assessment Officers whose expertise is judgement-based and resource-intensive to develop.

What are the potential risks of disaggregation that need to be considered?
Fragmentation of partnerships is highlighted as material consequence given the complexity of interdependencies with hospital discharge pathways, emergency services, and community and voluntary sector partners, who would be expected to engage with multiple ASC front doors following disaggregation. The service lead identified loss of consistency and the risk of variation in access and outcomes between areas, as a significant concern, directly linked to the reasons behind the recent CQC-driven consolidation. Reduced workforce flexibility and resilience is a further consequence, since capacity is currently redirected across localities to manage demand peaks, absence, and waiting lists. Opportunities have also been identified, including greater localised decision-making, clearer accountability, and potential for service innovation.

Interdependencies

- Hospital discharge pathways and integrated discharge/therapy teams
- ASC teams: Short Breaks, OT, locality teams for routing
- Centralised Business Support and flexible cross-locality staff deployment
- NHS, SECAMB, Police, Housing and Voluntary Sector partners

Next Steps/ Actions

Now
Map partner interdependencies and regulated roles, and model demand clustering on smaller footprints.

Next
Confirm shared systems, information governance and allocation of experienced staff across successors.

Future
Protect threshold consistency, specialist front-door capacity and NHS, police and VCS partnerships.

Scope:
The Adult's Sensory Service supports adults aged 18+ who are Deaf, hard of hearing, sight impaired or deafblind. It delivers statutory Care Act 2014 duties alongside preventative and wellbeing activity, providing specialist assessment, care and support planning, enablement interventions and safeguarding enquiries.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies, with a stronger caveat than most. Legislation prescribes no geography, the budget is a pooled countywide allocation, and no asset lock-in exists; Care Act and deafblind duties apply regardless of footprint. A scarce specialist workforce, pooled low-volume delivery and countywide contracts ending 2027 mean cooperation between successors is needed.

3.2.3 Adults Sensory Services

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in the Delivery Model and Staffing drivers. Demand is uneven and progressive rather than volume-led, with higher concentrations of Deaf and BSL-using populations in South East Kent and increasing complexity from acquired deafblindness linked to ageing. Delivery is a small, integrated countywide team relying on pooled specialist capacity and flexible deployment, supplemented by commissioned Sensory Wellbeing and Interpreting and Communication Services contracts both ending in 2027. Staffing complexity reflects the small service establishment with individual specialisms and specialist qualification thresholds, some of which are only held by a small number of staff, Social Work England registration requirement and evidenced recruitment difficulty. Budget is pooled countywide and modest. Assets/Systems includes service-level licences for Convo UK video interpreting, Widget software and BSL Widget, plus specialist equipment via Medi-equip or Argenti contracts. Legislative complexity spans statutory Care Act 2014 duties (including specific deafblind duties) and Section 42 safeguarding, which depend on specialist competence rather than geography.

What are the potential risks of disaggregation that need to be considered?

The most decision-relevant consequences are loss of economies of scale in a low-volume, uneven-demand service; reduced flexibility to respond to demand variability; duplication of specialist roles, management and interpreting costs; increased workforce fragility and single-point-of-failure risk; and reduced service quality, resilience and consistency of practice. The consequences of full separation, particularly given the scarce specialist labour market and the concentration of qualifications in a very small number of staff. Where deafblind assessment expertise sits in one successor authority but demand arises in another, formal cooperation arrangements would be required to ensure statutory duties can be discharged consistently across all areas.

Interdependencies

- ASC finance, charging, commissioning, purchasing and safeguarding functions
- Pooled specialist workforce flexed to demand countywide
- Commissioned providers KAB, Hi Kent and 3D Care
- Sensory Wellbeing and Interpreting contracts ending 2027

Next Steps/ Actions

Now

Map scarce specialist deafblind and BSL qualifications against successor authority capacity.

Next

Coordinate recommissioning of the 2027 contracts and agree cross-boundary cooperation arrangements.

Future

Sustain the specialist workforce pipeline and consistent Care Act deafblind assessment.

Scope:
Within ASCH Short Term Support, KCC's Blue Badge Service administers applications and eligibility decisions for disabled parking badges for adults and children with mobility impairments, under the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000. KCC is England's largest Blue Badge issuing authority.

Does Disaggregation by default apply to this service? Yes
Why?

Disaggregation by default applies. Legislative basis and Demand are Green—statutory duty applies to each authority individually and the residency rule gives a clean geographic basis. Amber Delivery, Staffing, Budget and Assets/Systems reflect a fully countywide model, only 5.4 FTE clinical assessors, mixed funding, and DfT-held platforms not KCC-contracted.

3.2.4 Blue Badge Service (including Mobility Assessors)

Complexity Driver RAG Assessment					
Demand (A)	Green	Delivery Model (R)	Amber	Staffing (G)	Amber
Budget (G)	Amber	Assets/ Systems (A)	Amber	Legislative (R)	Green

Complexity Overview

What makes this service complex to disaggregate?
Delivery model complexity reflects a fully countywide operation with no locality bases, five Gateway/Library clinic locations across Kent, dependence on centrally coordinated commissioning and KCC corporate HR/payroll support, and enforcement already sitting separately with the 12 district, borough and city councils under a local agreement with the GET Kent Parking Manager. Staffing complexity is driven by scarce professionally regulated capacity (5.4 FTE HCPC/NMC/GMC-registered Blue Badge Eligibility Assessors and 1 Senior Practitioner OT) and difficulty recruiting Occupational Therapists. The service depends on a mix of shared budgets, national systems and partner-led arrangements, creating operational and contractual dependencies that would make disaggregation challenging. Demand data is currently recorded by ward rather than by district, borough or city council, meaning data translation would be needed to support successor authority allocation, although the residency rule provides the underlying legal basis.

What are the potential risks of disaggregation that need to be considered?
Loss of economies of scale (KCC is the largest issuing authority in England), insufficient resource to manage or deliver effectively if split into multiple areas, increased investment required to run multiple services, and greater variation in processes and service delivery across areas. Requests already outweigh resource. Clinical assessment capacity is the binding constraint at 5.4 FTE for the whole county, and that a viable minimum clinical capacity per successor authority is a live question. A further consideration is the timing of existing contractual arrangements. Several key contracts and system agreements are due for renewal over the coming years, meaning any disaggregation would need to be carefully coordinated with these milestones to avoid unnecessary cost, duplication or disruption. The service lead identifies an opportunity of disaggregation: a Blue Badge Service in a new authority with stronger links to Parking Enforcement services.

Interdependencies

- Countywide workforce of 15.6 FTE, only 5.4 FTE clinical assessors
- IEG4 case management system, contract ending August 2027
- DfT-held Valtech and APS platforms, re-tendering 2026/2027
- District/borough enforcement via GET Kent Parking Manager; Medway non-IEG4

Next Steps/ Actions

Now
Re-cut demand data from wards to successor footprints and confirm income apportionment.

Next
Decide single hosted or independent model and allocate scarce clinical assessor capacity.

Future
Align IEG4, Valtech and APS decisions with contract timelines and consistent eligibility standards.

Scope:
Community Day Services is an in-house, countywide adult social care service supporting adults with learning disabilities, including complex and profound needs, to live independently, maintain wellbeing and stay connected to their communities. Delivered Monday to Friday through building-based, community outreach and digital activities, it underpins KCC's statutory Care Act duties.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies. Delivery is entirely in-house through a countywide model with clear East/West Kent management, hub-based operations and locality coordination, so structure is divisible; budgets run East/West, staffing is locally deployed with no barrier roles, and no legislation impedes geography. However, a mixed distributed estate, uneven specialist environments and lease arrangements need careful management.

3.2.5 Community Day Services

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (R)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

The dominant complexity driver is Assets and Systems (Red). The service operates from a complex, mixed estate that includes KCC buildings, District and Borough council premises with mixed lease or peppercorn-rent arrangements, creating multi-party interdependencies and limiting reconfiguration flexibility. Specialist environments such as Changing Places toilets and sensory rooms are unevenly distributed across localities. Demand (Amber) is geographically uneven and shaped by a dependency-based capacity model, meaning provision cannot be flexibly rebalanced without corresponding estate and specialist equipment in place. Delivery model complexity (Amber) arises from these asset and demand interdependencies, together with co-location arrangements and the service's dependence on the Kent Communities Programme and District/Borough partners.

What are the potential risks of disaggregation that need to be considered?

The uneven distribution of specialist facilities, including Changing Places provision, sensory rooms and accessible personal care suites, creates a risk that future investment decisions by successor authorities could lead to greater geographic variation in access. This may disrupt continuity of service provision for residents who currently rely on services located across future local authority boundaries, potentially affecting access to specialist support and established care arrangements. Fragmentation of leadership, safeguarding oversight, quality assurance arrangements and dependency-based capacity management could also reduce consistency of practice and decision-making across Kent. In addition, asset, lease and estates commitments, particularly Crawford House and any S106-related obligations, will require careful management where responsibilities transfer between authorities. Operational resilience may be further affected as cross-boundary staff deployment and mutual aid arrangements is difficult, limiting flexibility to respond to demand pressures, vacancies and sickness while maintaining seamless support for residents.

Interdependencies

- KCC Infrastructure and Property Teams manage the buildings used
- Kent Communities Programme for co-location in KCC buildings
- District and Borough Councils host hubs; centrally managed S106
- NHS therapy partners; out-of-area/CHC funded attendees; 17 vehicle leases

Next Steps/ Actions

Now

Map estate, lease commitments and co-location arrangements across all hubs.

Next

Confirm which authority retains Crawford House and other lease and vehicle commitments.

Future

Sustain equitable specialist provision, consistent safeguarding and quality assurance across localities.

Scope:
Kent Enablement at Home (KEaH) is a KCC in-house Adult Social Care service providing short-term, home-based support to help adults remain safe and independent following illness, injury or hospital admission. It rebuilds daily living skills, confidence and routines, covering East, West and North Kent, including KEaH+ for acute-hospital discharges.

Does Disaggregation by default apply to this service? Yes
Why?

KEaH can reasonably be treated as disaggregation by default. Despite complexity across demand, delivery, budget and staffing, none evidences a whole-service constraint. Locality-based teams already operate across East, West and North Kent; workforce, assets and legislative basis are broadly replicable. Complexity in shared central functions, cross-boundary deployment and demand variation needs sequencing, not exception.

3.2.6 Kent Enablement at Home (KEaH)

Covering: KEaH West Kent (including KEaH+) and KEaH East Kent

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

A delivery model (Red), which combines locality-based teams with centralised Business Support functions covering rostering, allocation and countywide out-of-hours cover, alongside Flexi Locality Organiser and Permanent Relief Enablement Support Worker capacity operating across team boundaries. Demand (Amber) varies markedly across the county, reflecting the legacy of the 2024 transfer of a previous contract into KEaH. West and North Kent are heavily reliant on Discharge to Assess pathways (over 85% of demand in some areas) and operate a predominantly acute discharge-focused model, while East Kent draws from a broader referral mix alongside Health-funded Home First provision. Rising complexity in mental health, self-neglect and multiple long-term conditions cuts across all areas. Staffing (Amber) is broadly replicable but depends on cross-locality flexibility and management oversight, with a 17% overall vacancy rate and persistent recruitment difficulty in West Kent South (27%). Ongoing transformation, including the rostering system replacement, Oracle Cloud changes and Home First developments in West and North Kent, adds sequencing considerations for any disaggregation.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies loss of flexibility to deploy staff across localities in response to demand and operational pressures as a key risk, alongside potential loss of flexibility of the current core management structure — including Operational Managers, Operational Support Managers and Flexi teams which underpin resilience and continuity. Reduced flexibility of the Business Support Team is also flagged. Disaggregation may require changes to existing CQC registrations and governance arrangements. The extent to which deregistration, variation, or new registration applications would be required should be confirmed with the CQC based on the final organisational and geographic design. Disaggregation would also need to preserve KEaH's role as provider of last resort where commissioned care arrangements break down, given its contribution to wider system resilience. Opportunities noted include creating a more responsive offer for Health partners through a rebalanced referral mix and expanding the scope of CQC registrations to better align with Home First.

Interdependencies

- ASC Community Teams, OT and Purchasing for care pathways
- ASC Business Support: rostering, allocation, countywide out-of-hours cover
- Consolidated CQC governance across five registrations
- Acute/community hospitals for discharge; Cygnum rostering contract; Mediequip

Next Steps/ Actions

Now

Complete rostering system recommissioning and confirm licensing ahead of May 2026.

Next

Establish the full budget baseline and map staffing and cross-locality deployment across teams.

Future

Preserve provider-of-last-resort function, discharge integration and CQC alignment to future footprints.

Scope:
Kent Enablement Services (KES) is a single, integrated, in-house countywide Adult Social Care service delivering short-term, outcome-focused enablement to adults aged 18+ whose needs have emerged or changed. It includes the Intensive Intervention Service and the Home from Hospital pathway, underpinning statutory Care Act duties on prevention, wellbeing and safeguarding.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies. Demand is geographically balanced, delivery is in-house with no contractual, statutory, asset, budget or workforce-regulation constraint on reconfiguration. Amber Demand and Delivery reflect reliance on pooled countywide capacity and NHS, Police and community partner interdependencies—implementation considerations to manage through transition, not barriers to disaggregation.

3.2.7 Kent Enablement Services

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is driven principally by the Amber-rated Demand and Delivery Model drivers. The assessment evidences that the service's ability to manage short-term peaks, demand variability and workforce gaps depends on countywide pooling of capacity, and that localised delivery would lack the resilience to absorb such surges. The hybrid delivery model relies on flexible cross-Kent deployment of staff to respond to fluctuating and time-critical demand, particularly within the Intensive Intervention Service and the Home from Hospital pathway. Delivery complexity is heightened by operational interdependencies with NHS partners for psychiatric hospital discharge, alongside partnership working with Police, Community Wardens, Social Prescribers, Probation Service and Prevent. Staffing, Budget, Assets/Systems and Legislative drivers are Green-rated and are not evidenced as creating material implementation constraints.

What are the potential risks of disaggregation that need to be considered?
The assessment identifies that reduced ability to pool capacity countywide could weaken operational flexibility and responsiveness to short-term peaks in demand and workforce gaps, with localised services described as lacking resilience to absorb such pressures. Disaggregation could make coordination across the Home from Hospital pathway more complex, particularly for people leaving psychiatric hospitals and mental health wards who require timely support. Coordination across NHS, Police, Community Wardens, Social Prescribers, Probation Service and Prevent could become more complex where organisational or geographic boundaries diverge from partner footprints, given the service is described as system-critical within Adult Social Care. Existing recruitment difficulties in West Kent and North Kent could be exacerbated if flexible cross-county deployment is reduced.

Interdependencies

- System-critical within Adult Social Care pathways
- Flexible cross-Kent staff deployment and countywide capacity pooling
- NHS partners for Home from Hospital psychiatric discharge
- Police, Community Wardens, Social Prescribers, Probation, Prevent

Next Steps/ Actions

Now
Map workforce deployment and rotas under reduced cross-Kent flexibility, and disaggregate service data.

Next
Clarify NHS and Police interfaces across footprints and agree cross-system governance.

Future
Protect continuity of system-critical pathways and localised model resilience.

Scope:
The Occupational Therapy Service provides Care Act-compliant assessments for adults with long-term conditions, supporting independence, safety and quality of life at home. Using a strengths-based approach, it covers assessment, moving and handling, equipment, and minor and major home adaptations, including the statutory duty to recommend Disabled Facilities Grants.

Does Disaggregation by default apply to this service? Yes
Why?

There is no reason the service is unsuitable for disaggregation by default. The community function already runs through ten area-based teams aligned to district footprints; Legislative basis and Assets/Systems are Green with no geographic constraint. Amber Demand, Delivery, Staffing and Budget reflect countywide clinical leadership, flexible deployment, centralised equipment budgets and workforce resilience—which are considered implementation consequences to address, rather than barriers.

3.2.8 Occupational Therapy Service

Covering: Principal Occupational Therapist, OT West Kent, OT East Kent

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Demand is unevenly distributed, with some areas experiencing significantly higher activity than forecast - Ashford, for example, is currently running around 18% above its five-year average. Rural areas such as Ashford, Tunbridge Wells and Sevenoaks also face greater travel-related capacity pressures that are not reflected in referral volumes alone. The delivery model combines ten area-based teams with countywide functions, including the Principal OT, Practice Development Officer, high-cost equipment sign-off and OT Risk Panels, and depends on flexible countywide deployment of staff. Staffing complexity reflects a generalist-specialist model in which a broad HCPC-regulated skillset is embedded in every practitioner, combined with recruitment difficulties for senior OTs in West and North Kent, NHS pay competition and an ageing senior workforce. Budget complexity arises from an East/West Kent split, countywide equipment budgets subdivided by cohort, and unevenly distributed Better Care Fund income for DFG posts concentrated in five districts. The Assets/Systems and Legislative drivers are Green and are not identified as material implementation issues.

What are the potential risks of disaggregation that need to be considered?

The service lead identifies fragmentation of a dedicated, generalist OT model as the principal risk, concerned that integrating OTs into broader social care or housing teams would reduce flexibility, dilute end-to-end support from a single practitioner and lose specialist capability that other professional groups cannot substitute for core OT functions such as equipment, adaptations and advanced moving and handling. Loss of countywide clinical leadership, sign-off arrangements and OT Risk Panels could weaken governance of complex and high-cost cases, which are identified as a core and routine components of delivery rather than exceptions. Workforce consequences are material: recruitment is already difficult for senior and experienced OTs, particularly in West and North Kent, and replicating this specialist workforce across multiple successor organisations would place additional pressure on retention, succession and NHS pay competition. Redistribution of centrally managed equipment budgets and unevenly distributed BCF-funded DFG posts would require careful governance to preserve equity and sustainability across new organisations. Conversely, opportunities identified include closer alignment with district housing systems.

Interdependencies

- Countywide clinical leadership (Principal OT) and OT Risk Panels
- District councils for DFG administration and BCF-funded posts
- Medequip for countywide Community Equipment Service
- NHS partners; KMCR shared records; TBOT equipment support

Next Steps/ Actions

Now

Map senior and specialist OT workforce risks across Kent and Medway footprint

Next

Confirm equipment contract, BCF-funded DFG posts and KMCR access across successor organisations.

Future

Consider how future design models can preserve the benefits of the current generalist-specialist model particularly where shared governance supports high-cost equipment and complex cases.

Scope:
KCC's ASC Performance team provides assurance, insight and evidence to support delivery of statutory adult social care functions. It produces operational and strategic performance reporting, statutory data returns (DHSC, NHSE, ADASS), KPI reporting, Power BI dashboards, bespoke analysis, national surveys and CQC assessment preparation.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies. The team is not statutory and no statutory prohibition exists; Demand, Delivery, Budget and Legislative basis present no barriers—delivery is centralised with no external contracts. The recommendation is conditional: a small senior-weighted team holds concentrated knowledge of national statutory returns, shared reporting platforms raise ownership questions, and Day-1 continuity is required.

3.2.9 Performance

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Staffing complexity is driven by a small senior-weighted team of 9.6 FTE, with knowledge and experience relating to national statutory data returns concentrated within senior officers, meaning successor organisations would need to ensure equivalent capacity and expertise to fulfil statutory reporting obligations. Assets/Systems complexity centres on reliance on shared reporting infrastructure (SQL Server querying the ASC client system for daily refreshes, Power BI for visualisation, Power Automate for row-level extract and workflow management, and Fabric going live end of June 2026). Demand is countywide and driven by statutory and operational reporting obligations rather than by geography, and officers currently hold both specialist countywide roles (DoLS, Safeguarding, Connect, Short-Term Pathways) and area-based lead roles for NK, WK, A&C and T&SKC that would need to be replicated or coordinated.

What are the potential risks of disaggregation that need to be considered?
The concentration of knowledge and experience in senior officers, potential increase from two sets of statutory returns (Kent and Medway) to up to five separate sets increasing demand and reduced consistency, comparability and benchmarking if multiple methodologies exist are highlighted as primary risks. There may be further complexity where an operational service covers multiple geographical areas and requires performance data from across those areas, successor organisations will need to work together to ensure data is shared and coordinated effectively. Statutory continuity of national data returns is a Day-1 requirement rather than a delivery model prescription. There are opportunities to strengthen leadership capacity within individual councils, alongside ASC Performance knowledge being present across all new councils and the ability to focus on smaller geographies and more localised analysis.

Interdependencies

- ASC client system as primary data source
- Shared platforms: SQL Server, Power BI, Power Automate, Fabric
- Public Health, KMPHO, Analytics and other ASC services
- DHSC, NHSE, ADASS returns; CQC; SE ADASS peer network

Next Steps/ Actions

Now
Plan transfer or sharing of statutory data return expertise held by senior officers.

Next
Decide ownership, licensing and hosting for SQL Server, Power BI, Power Automate and Fabric.

Future
Sustain statutory return capability, methodological consistency and inter-organisational data sharing across authorities.

Scope:
Quality Assurance (QA) is an in-house, centralised, countywide function within ASCH Short Term Support providing independent assurance and improvement support across Adult Social Care Enablement & Support Services. Through remote audit, intelligence analysis and targeted onsite activity, it reviews practice, processes and outcomes, underpinning statutory Care Act 2014 duties.

Does Disaggregation by default apply to this service? Yes
Why?

No strong evidence to exempt QA from disaggregation by default. Complexity across demand, delivery, staffing and legislative context is described as implementation and transition considerations, not structural or legal barriers. The service holds no dedicated assets or contracts. The main consideration is workforce concentration in two senior specialist roles which may be difficult to replicate.

3.2.10 Quality Assurance

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in staffing, where the entire function is delivered by two senior specialist posts whose effectiveness depends on accumulated professional judgement, safeguarding expertise, regulatory knowledge, and detailed system understanding that the assessment describes as difficult to develop quickly or replicate at scale. Demand adds further complexity because it is specialist and non-routine, driven by risk, governance concerns, and emerging intelligence rather than predictable, geographically distributed workload, which limits the applicability of simple area-based allocation. The centralised, countywide delivery model reinforces this, as activity is prioritised flexibly across the whole system rather than through fixed locality structures, meaning consistency and system-wide oversight are intrinsic to how the service operates. The legislative context contributes indirectly, with regulatory expectations around independence, consistency, and system-wide visibility shaping how any alternative arrangement would need to be designed to sustain statutory adult social care and safeguarding responsibilities.
What are the potential risks of disaggregation that need to be considered? The assessment identifies that disaggregation by locality or service line could erode the independence, consistency, and system-wide oversight that underpin the function's value, weakening the ability to detect cross-service themes, repeated governance failures, and emerging risk across Enablement & Support Services. Splitting a two-FTE specialist team across multiple unitary authorities would dilute expertise, constrain capacity, and create resilience challenges, with a stated risk of shifting the function from a preventative to a reactive posture. The assessment also flags heightened safeguarding and regulatory exposure during the period of organisational change, particularly given continued national emphasis on adult safeguarding, prevention, and CQC system-level assurance.

Interdependencies
- Service-level audit material and safeguarding intelligence across ESS - Engagement with service managers across Enablement & Support Services - Shared systems: Mosaic, Power BI, Copilot, Magic Notes (Beam) - No external partner or contract dependencies identified
Next Steps/ Actions
Now Map continuity risks tied to the two specialist posts and baseline current activity. Next Decide whether QA aligns with the ESS footprint and clarify post-boundary system access. Future Preserve independence, specialist capacity and system-wide visibility aligned to CQC expectations.

Scope:
Shared Lives provides personalised long-term, short break and day support for adults with eligible care needs, delivered through approved carers offering care within their own family homes. It recruits, trains, assesses and approves carers, matches adults to placements and provides ongoing monitoring, supporting 228 adults including 117 care leavers.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies; no single complexity factor prevents it. Complexity stems from uneven countywide demand and carer supply, a specialist regulated delivery model, pooled budgets and income, and a small CQC-registered workforce reliant on scale and cross-district matching. The assessment does not show the service could not operate through disaggregated authorities with potential collaborative arrangements.

3.2.11 Shared Lives

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Demand is spread unevenly across Kent, with some districts generating high referral volumes despite comparatively low local carer supply, meaning the service depends on cross-district matching to secure suitable placements. The delivery model is organised on a single countywide basis, with flexible staff deployment, centralised referral management, a single CQC-registered leadership structure and countywide Carer Agreements that together support management of this uneven demand. Staffing complexity reflects a small workforce of 20 FTE with a high proportion of specialist and regulated roles, including social work-qualified officers and a CQC-registered Manager, all organised countywide rather than by locality. Budget, assets and systems, and legislative basis are rated Green, but the assessment notes that pooled budgets, corporate system access and statutory continuity would still need to be reconfigured across any new footprints. Any disaggregated model may also require formal cross-boundary protocols to maintain matching flexibility where local demand and approved carer supply do not align.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies the loss of economies of scale as a primary consequence, with statutory and specialist roles, including the Registered Manager, Assistant Manager and referral and recruitment functions, needing to be duplicated across multiple footprints. Duplicating CQC-registered leadership, assessment capacity and quality assurance arrangements is described as raising regulatory and quality risk and the potential for inconsistency between areas. Replicating specialist roles across smaller footprints creates workforce risk given recruitment pressure on regulated posts and could reduce overall system resilience. Reduced ability to flex resources is highlighted as a risk to managing uneven demand and higher-complexity cases, including care leavers with established placements, with potential delays or placement instability. The assessment also notes financial consequences from duplication costs and erosion of the reported £4.81m in annual savings compared to residential or supported living provision, alongside a risk that fragmentation of teams and systems could destabilise carer payments and long-term placements. Any disaggregated model may also require formal cross-boundary protocols to maintain matching flexibility where local demand and approved carer supply do not align.

Interdependencies

- ASC teams provide referrals, funding and statutory responsibility
- Central commissioning, legal, HR; Oracle, Mosaic, Liberi systems
- Single CQC-registered Manager and Assistant Manager
- Out-of-county authorities for placement income; NHS CHC funding

Next Steps/ Actions

Now

Map out-of-county placements, income streams and CQC-regulated roles against future footprints.

Next

Decide independent or collaborative operation, CQC registration ownership and potential cross-boundary matching governance.

Future

Preserve scale, specialist capacity and out-of-county income under any future model.

Scope:
Short Stay Services, delivered through four Integrated Care Centres, provide short-term residential care for adults across Kent who cannot temporarily remain at home. Supporting assessment, recovery, enablement, respite and hospital discharge, stays typically last up to six weeks in CQC-registered settings under a statutory Care Act duty.

Does Disaggregation by default apply to this service? Yes
Why?

There is no reason the service is unsuitable for disaggregation by default. Delivery is already distributed across four sites with locally allocated budgets aligned to acute hospital catchments, and statutory Care Act, safeguarding and CQC-registered roles apply at site level. Countywide funding flows, shared workforce and PFI arrangements need transition, not exception.

3.2.12 Short Stay Services/Integrated Care Centres

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (R)	●	Assets/ Systems (R)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity arises from the interaction between countywide demand flows and a distributed but interconnected delivery model. Demand is uneven, concentrated in East Kent districts (Folkestone & Hythe, Canterbury, Ashford, Thanet and Dover) and closely tied to acute hospital discharge pathways, meaning service users routinely cross district boundaries. Three of the four centres (Gravesham Place, Westbrook House and Westview) are subject to PFI contracts running to 2031-2033, which tie provision to specific buildings and constrain reconfiguration. Budgets are site-based but dependent on 85% occupancy assumptions and external ICB and CHC income, making financial performance sensitive to activity levels. Staffing includes cross-site deployment managed centrally, alongside a 10% vacancy rate and recruitment pressures in frontline care roles. Shared functions including Quality Audit, safeguarding and DoLS operate service-wide rather than site-by-site.
What are the potential risks of disaggregation that need to be considered? The assessment identifies financial, demand-flow and PFI-related contractual risks as the most material consequences. Allocating funding by geography, where admissions and income are tied to acute hospital catchments, could expose successor authorities to income loss during periods of void beds or lower occupancy, particularly at sites serving East Kent hospital flows. The assessment notes that this could create a significant funding and debt risk for the hosting unitary authority and reduce the quality and outcomes of the service. PFI obligations at three sites represent a further consequence, as contractual, legal and financial responsibilities running to 2031-2033 would need to be managed across successor bodies and may require transitional arrangements. Continued reliance on cross-boundary hospital discharge pathways means any split configuration will need to preserve system-wide flow to avoid disruption to acute discharge performance.

Interdependencies
- Short Term Pathways, locality teams, OT for assessment and enablement - East Kent acute hospitals and Darent Valley discharge flows - PFI partners GFM and Shaw Healthcare (three sites to 2031-2033) - ICB and CHC income; KCHFT co-located at two sites
Next Steps/ Actions
Now Map cross-site staffing, PFI liabilities and ICB/CHC income across sites and areas. Next Agree funding split, PFI apportionment and void-bed risk across successor authorities. Future Preserve hospital discharge integration and plan for PFI expiry and estate configuration.



Scope:
The Short Term Pathways service delivers statutory Care Act 2014 assessments for adults following an acute health episode, supporting timely hospital discharge and recovery at home or in short-term residential settings. It uses a strengths-based approach with individuals, families and carers to maximise independence, safety and wellbeing.

Does Disaggregation by default apply to this service? Yes
Why?

There is no reason the service is unsuitable for disaggregation by default. It already operates through three geographically aligned teams (East, West, North Kent), delivery is fully in-house, and Budget, Staffing, Assets/Systems and Legislative basis are Green. Complexity concentrates in Red Demand—uneven distribution, variable pathway mix, cross-boundary hospital catchments—and Amber Delivery, shaping implementation rather than feasibility.

3.2.13 Short Term Pathways

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is the primary complexity driver. Referral data for April 2025 – March 2026 shows materially uneven volumes and pathway mix across Kent, with East Kent carrying a disproportionately high proportion of Pathway 3 activity (1,371 cases, 49.96% of non-acute discharges), while West and North Kent volumes are inflated by Pathway 1 flows that largely function as gateways into KEaH+. Hospital catchments are countywide and include patients from outside Kent, and discharge locations are not aligned to a person's area of ordinary residence, including edge cases such as Human Rights Act assessments for individuals unknown to any service. Delivery adds further complexity: business support is centralised, staff are flexibly redeployed across areas under Operational Pressure Escalation Levels, and partner relationships (NHS trusts, ICBs, SECAMB, KEaH/KEaH+) are complex and configured differently in each geography. The outcome of the recent service review, repositioning teams into acute hospitals, may further shift complexity depending on the LGR footprint and distribution of acute sites. What are the potential risks of disaggregation that need to be considered? Several directly evidenced consequences are identified. Established multi-agency working relationships with NHS trusts, SECAMB, ICBs and housing partners could be destabilised by new organisational boundaries, and cross-boundary activity with Bexley, Bromley, East Sussex and Medway would need to be re-governed. Resilience is a specific concern: the current model relies on flexible cross-area deployment to absorb vacancies and demand spikes, which would be harder to sustain in smaller successor footprints. Accountability gaps are also evidenced for out-of-area and complex cases (e.g. individuals with no leave to remain presenting at acute sites), where no successor authority would have a natural lead. Recruitment and retention pressures in East and parts of West Kent, together with identified skills gaps (learning disability, autism, dementia, S117, homelessness, addiction), could be exacerbated by workforce fragmentation.

Interdependencies
- STP OT, KEaH/KEaH+, Enablement and Short Stay Services - ASC community teams and centralised business support - NHS acute/community partners, ICB and mental health services - SECAMB, Police, CGL, district housing; Sunrise, RIO, KMCR systems
Next Steps/ Actions
Now Quantify cross-boundary and out-of-area caseloads and map hospital-specific partner relationships and system access. Next Agree accountability for out-of-Kent and no-clear-lead cases and health-funded post arrangements. Future Align to Neighbourhood Health footprints and sustain cross-area resilience and cross-boundary discharge governance.

Scope:
 The Strategic Safeguarding Unit (SSU) is a KCC in-house team within ASCH Short Term Support providing strategic leadership, assurance and coordination for adult safeguarding. As KCC's lead safeguarding function, the SSU supports KCC in fulfilling its role as a statutory partner of the Kent and Medway Safeguarding Adults Board and coordinates Safeguarding Adults Reviews and related statutory reviews.

Does Disaggregation by default apply to this service? Yes
Why?

There is no reason the service is unsuitable for disaggregation by default. Safeguarding legislation places duties on each authority but prescribes no geographic model; Budget and Assets/Systems are Green with no contract or bespoke technology. Red ratings for Demand and Legislative factors, and Amber ratings for Delivery and Staffing reflect a specialist statutory function with concentrated expertise and deep KMSAB interdependencies.

3.2.14 Strategic Safeguarding Unit

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?

Demand is specialised rather than high volume, fluctuating countywide by review type and locality, with 34 ongoing SARs and 26 ongoing DARDRs distributed across Kent. Individual reviews are resource-intensive and extend over long periods, requiring specialist understanding of the Adult Social Care legal framework, organisational history, safeguarding practice and independent interrogation of Mosaic records. The delivery model is a single, centralised, countywide team of 8 FTE, with resources flexed against demand rather than aligned to localities, and officers holding links to teams in the four localities for training and awareness. Staffing complexity arises from reliance on a small senior-weighted team of professionally qualified nurses and social workers whose accumulated knowledge underpins statutory review and assurance activity. Legislative complexity spans multiple statutory duties under the Care Act 2014 (Sections 42, 43, 44), the Domestic Violence, Crime and Victims Act 2004, the Children Act 2004 and the Counter-Terrorism and Security Act 2015, with statutory accountability remaining with the local authority regardless of delivery model. Anticipated national reforms, including the Casey Commission's National Safeguarding Board and the Public Office Accountability Bill, may increase scrutiny and reporting expectations.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies the main risk as loss of the specialist knowledge and experience of the system, practice, processes and specialist areas of expertise that would be hard to replicate within smaller teams, and loss of the current team's ability to work to priorities and respond to unpredictable demand across Kent. The assessment reinforces that individual localities are unlikely to sustain the specialist review activity given the low volume but high complexity of cases. Fragmentation of the countywide coordination role could disrupt continuity of ongoing SARs, DHRs and DARDRs, and interfere with the SSU's formal interface with the Kent and Medway Safeguarding Adults Board and partner agencies (Kent Police, NHS, SECamb, Community Safety Partnerships and the Children's Partnership). Continuity of statutory representation at MARAC, MAPPA and Channel would also need to be maintained. Statutory accountability and liability remain with each local authority regardless of delivery model, meaning any shared or hosted arrangement would still carry individual authority accountability.

Interdependencies

- ASC operational teams for SAR/DHR/DARDR coordination and learning
- Performance colleagues for safeguarding data; Mosaic system access
- Kent and Medway Safeguarding Adults Board formal interface
- Police, NHS, SECamb; MARAC, MAPPA, Channel representation

Next Steps/ Actions

Now

Confirm a continuity plan for ongoing SARs, DHRs, DARDRs and Child Reviews.

Next

Map KMSAB and partner interdependencies and assign statutory accountability across successor authorities.

Future

Sustain specialist assurance, single KMSAB interface and readiness for national safeguarding reform.

Scope:
Within ASCH's Short Term Support division, this service provides countywide professional leadership, policy development and quality assurance across Adult Social Care. It supports lawful, consistent practice through specialist policy advice, quality assurance, workforce development and statutory roles including the Principal Social Worker and oversight of the Assessed and Supported Year in Employment (ASYE) programme.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies; no whole-service hard constraint exists. Complexity arises from specialised, non-geographic demand, a centralised countywide model and concentrated specialist staffing rather than budget, assets or statutory geography—legislation prescribes no geographic model. Specialist MHA, Section 117, charging, AMHP and ASYE expertise is embedded in individual posts; Tri.x contracted to 2027.

3.2.15 Strategic Safeguarding, Policy, Practice and Quality Assurance

Covering: Practice Development Officers, Policy and Quality Assurance Team, Principal Social Worker, Newly Qualified Social Workers Supervisors

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? The workforce is small and highly specialist, with recruitment challenges due to the specific mix of practice experience, legal literacy and advanced analytical and writing skills, and expertise in Mental Health Act compliance, Section 117 aftercare, finance and charging policy (including Disability Related Expenditure), AMHP and ASYE assessment embedded within individual posts. Demand is countywide and driven by legal complexity and workforce experience rather than geography, with substantial non-geographic corporate and statutory activity including Ombudsman investigations, complaints, Member enquiries and Freedom of Information requests, and North Kent and Thanet and South Kent Coast identified as areas of higher specialist demand. Delivery is a centralised, countywide function reliant on flexible deployment of specialist staff, with evidence that redeployment reduces core policy and quality assurance capacity. Legislative complexity arises from upcoming reforms including Mental Health Act reform, Liberty Protection Safeguards, changes to charging and financial assessment policy, and Adult Social Care reform following the Casey Commission, all of which are expected to increase demand for specialist policy interpretation. What are the potential risks of disaggregation that need to be considered? The assessment identifies the most significant consequences of disaggregation as the loss of scale and resilience within a small specialist function. Disaggregation could dilute concentrated expertise, reduce the ability to flex resources in response to emerging legal, policy and quality assurance demands, and weaken oversight across Adult Social Care. The service also acts as a key source of specialist advice and as a gatekeeper to legal services, helping to resolve complex issues at an early stage and manage legal expenditure. Disaggregation could fragment policy ownership and governance, leading to duplicated activity, inconsistencies in policy development and maintenance, and weaker oversight of practice standards. It may also reduce the service's ability to identify cross-cutting risks, themes and improvement opportunities through coordinated quality assurance activity. Further consequences could include reduced inspection readiness, less coordinated responses to CQC, Ombudsman and complaints activity, and weaker organisational learning through less coordinated audit and improvement programmes. The assessment also highlights potential inefficiencies through duplication of specialist functions and the loss of economies of scale.

Interdependencies
- Operational ASC teams and CHC liaison for policy and QA - Invicta Law legal gatekeeping; Tri.x policy platform to 2027 - Kent and Medway ICB and Partnership Trust; Medway joint arrangements - Social Care Development Team for ASYE; district housing; Police
Next Steps/ Actions
Now Map specialist expertise embedded in individual posts against successor authority capacity. Next Decide the Tri.x contract route before July 2027 and confirm Medway joint arrangements. Future Sustain specialist policy expertise and uphold high quality policy and practice assurance.



Scope:
KCC's Technical Service, within ASCH Short Term Support, delivers and fits equipment and technical solutions enabling adults to live independently at home, under the Care Act 2014, the Housing Grants, Construction and Regeneration Act and (for children) the Chronically Sick and Disabled Persons Act.

Does Disaggregation by default apply to this service? Yes
Why?

No legislation prescribes a countywide model; statutory duties can be discharged independently, and the service already includes geographically aligned technician patches with two stores (Ashford and Broadstairs) serving East and West Kent. The recommendation is conditional—Delivery, Budget and Assets/Systems reflect countywide oversight, centrally held budgets, the shared NHS equipment contract, a re-tendering rail contract.

3.2.16 Technical Service

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (G)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

Delivery model complexity centres on countywide oversight combined with locality-aligned technician patches, cross-cover across East and West Kent by two Senior Technicians, and reliance on centralised commissioning, HR, payroll, performance systems and OT clinical oversight. Budget complexity arises from a countywide-held budget (£584,900 staffing plus £287,800 non-staffing) split across multiple holders (Service Manager, Assistant Director and Medequip joint arrangement). Assets/Systems complexity involves two privately rented sites (Ashford and Broadstairs) via KCC Property, van fleet leased through KCC Commercial Services on staggered 4-year leases, fuel cards on the KCC corporate contract, and shared digital systems (Mosaic, Power BI, Granicus) requiring licensing and access resolution. Demand shows notable district-level variation (Maidstone 1,463 visits vs Tonbridge 301 in 2024/25) which affects operational allocation but not statutory divisibility. Staffing complexity is modest but noteworthy: 1 Service Manager (part-share OT role, HCPC-registered), 2 Senior Technicians with trade qualifications, and a 12 FTE County Technician establishment (not fully filled), with recruitment and retention challenges arising from a competitive labour market, alongside an experienced workforce with a significant proportion approaching retirement age.

What are the potential risks of disaggregation that need to be considered?

The service lead identifies loss of economies of scale in smaller services with higher leadership oversight cost, reduced efficiency where smaller services cannot cover peaks or absence, and operational complexity for referrers navigating postcode areas and potentially different provisions and processes across localities. Successor organisations would need to sustain leadership oversight, clinical governance, referral pathways and access to shared assets and contracts to avoid disruption. Contract sequencing is a further consideration given the Kent Integrated Community Equipment contract shared with the NHS, the galvanised rail contract currently being re-tendered, and staggered van lease renewals. Workforce risk is material given recruitment challenges and the ageing profile of Senior Technicians and technicians. There are opportunities identified alongside these risks, specifically pooling NHS and Social Care provision with one provider and joining with District housing services.

Interdependencies

- TBOT back-office; ASC, Children's Services and OT clinical oversight
- Central commissioning, HR, payroll; Mosaic, Power BI, Granicus
- KCC Property (two stores); Commercial Services (van leases)
- NHS Kent Integrated Community Equipment contract; galvanised rail re-tender

Next Steps/ Actions

Now

Confirm the full cost base and map equipment and rail contract values and dates.

Next

Decide continuity for the shared NHS equipment contract, stores, vans and digital systems.

Future

Sustain leadership oversight and clinical governance, exploring NHS pooling and district housing integration.

Scope:
The Deprivation of Liberty Safeguards service is a statutory function delivered by KCC as Supervisory Body under the Mental Capacity Act 2005. It protects the human rights of adults aged 18+ who lack capacity to consent to care arrangements amounting to a deprivation of liberty in hospitals or care homes.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. No legislation mandates a geographic model; Assets/Systems and Budget are Green. The recommendation is conditional, Red rated Delivery and Staffing, Amber rated Demand and Legislative basis. Particular considerations include the requirement for statutory independence of BIAs from locality teams, small and specialist team, reliance on countywide commissioned services (SEMAS, advocacy), a very limited BIA and S12 pool.

3.2.17 The Deprivation of Liberty Safeguards Service (DoLS)

Complexity Driver RAG Assessment					
Demand (A)	Orange	Delivery Model (R)	Red	Staffing (R)	Red
Budget (G)	Green	Assets/ Systems (G)	Green	Legislative (A)	Orange

Complexity Overview

What makes this service complex to disaggregate?

Demand is uneven across Kent, ranging from 1,204 applications annually in Tunbridge Wells to 75 in Faversham. Hospital-driven activity accounts for around 30% of demand and requires rapid, time-critical assessments through a dedicated hospital pathway. Approximately 35% of cases are high priority, with specialist expertise routinely required rather than used occasionally, including for complex neurological conditions. Service delivery must remain operationally independent from locality teams to meet Mental Capacity Act requirements and relies on countywide commissioned services (SEMAS S12 doctors, The Advocacy People, and independent Best Interest Assessors - BIAs), alongside a dedicated 12-strong central ASCH Business Support Team that flexibly manages workload and backlog. The workforce comprises 13.1 FTE, within a constrained market for BIAs and S12 doctors. Forthcoming Liberty Protection Safeguards reforms will replace the BIA role with AMCAP and redistribute responsibilities between social care and health, although the scale and timing of these changes remain uncertain.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies the primary risks as managing hospital demand, availability of BIAs, S12 doctors and advocacy provision, and loss of centralised oversight that enables resource to be deployed against demand and specialism. The assessment also highlights that individual localities are unlikely to generate enough specialist cases to sustain expertise, meaning disaggregation could produce skills gaps for high-priority cases. Delivery model risks include potential conflicts of interest, or the perception of them, if DoLS practitioners also work in locality teams, which could risk breaching the Code of Practice requirement for independent assessment. Countywide contracts for SEMAS, advocacy and independent BIAs would need to be varied, novated or temporarily shared. A further consequence is the need to allocate the existing backlog of assessments across successor authorities, alongside handling cross-boundary and out-of-county placements where responsibility is not yet defined. Liberty Protection Safeguards reform also raises a risk that health rather than social care needs are prioritised in any integrated arrangement.

Interdependencies

- BIAs and DoLS-trained managers from across ASCH for sign-off
- Dedicated 12-strong central ASCH Business Support Team; Mosaic system
- SEMAS S12 doctors, The Advocacy People, independent BIAs
- Seven Kent acute hospitals; Medway DoLS; out-of-county placements

Next Steps/ Actions

Now

Map BIA and specialist practitioner distribution and confirm hospital workflow ownership across ASCH.

Next

Decide backlog allocation, contract arrangements for SEMAS and advocacy, and pooling model.

Future

Preserve statutory independence, central coordination for hospital demand and Liberty Protection Safeguards alignment.

Scope:
This service commissions adult care and support services across Kent to meet assessed needs and improve outcomes, discharging statutory Care Act 2014 duties for market shaping and sustainability. It includes the Technology Enhanced Lives service supporting around 6,000 people.

Does Disaggregation by default apply to this service? Yes

Why?
Disaggregation by default applies; no statutory, contractual, financial or asset barrier prevents separation. Care Act 2014 market-shaping duties relate to sustainability rather than geography, demand is countywide with local variation, workforce constraints are matters of expertise not regulation, and countywide budgets carry no pooled governance preventing redistribution. Complexity is an implementation consequence, not a barrier.

3.3.1 ASCH Commissioning

Staffing (Prevention, Living and Ageing Well and Assurance) - Brokerage and Technology Enabled lives

Complexity Driver RAG Assessment					
Demand (G)			Delivery Model (R)		
Staffing (G)					
Budget (A)			Assets/ Systems (G)		
Legislative (G)					

Complexity Overview

What makes this service complex to disaggregate?

The red rating for delivery model reflects an in-house, countywide commissioning function in which core activity is organised centrally and supported by shared Finance, Legal, Performance and CPD functions, alongside partnership working with the NHS ICB. Disaggregation would therefore need to unpick a set of centralised operational supports and cross-boundary partnership mechanisms that currently underpin delivery. The Amber budget rating adds further complexity: the service manages a £5.7m staffing budget and oversees significant commissioned spend, as well as managing Technology Enhanced Lives, time-limited ICB funding for Joy platform and Feebris, central government grants running to 2028/29, and multiple MTFP savings commitments. Although staffing is rated Green, the concentration of specialist commissioning and contract management knowledge in long-standing senior commissioners should be noted as a delivery risk that could complicate replication or division of roles.

What are the potential risks of disaggregation that need to be considered?

Loss of economies of scale, increased duplication, and service variation across localities as separate commissioning approaches emerge. Dividing commissioning resources fairly is described as difficult, and there is a risk of losing specialist and historic knowledge of services and contracts held by senior staff. Providers operating across Kent would face an increased burden through the need to engage with multiple successor commissioning arrangements. Set against these consequences, there are also opportunities, including more localised services, deeper insight into demographic trends and community assets, stronger relationships with NHS, housing and VCSE partners, greater agility to pilot new approaches, and improved coproduction. Taken together, these represent implementation consequences to be managed rather than evidence of a whole-service constraint on disaggregation.

Interdependencies

- Centralised Finance, Legal, Performance and CPD functions
- Experienced senior commissioners holding specialist contract knowledge
- MOSAIC system; ownership and licensing to clarify
- ICB and Better Care Fund; Joy and Feebris ICB funding

Next Steps/ Actions

Now

Map contract portfolios, values and end dates across the three commissioning areas.

Next

Decide Better Care Fund and ICB partnership governance and countywide budget allocation.

Future

Preserve market-shaping capability and senior commissioning knowledge across successor commissioning bodies.

Table of Contents – Business Support (ASCH)

Kent County Council – Divisional Groupings · click any entry to open its slide

3 ASCH

3.4 Business Support (ASCH)

3.4.1 Business Support Unit

3.4.2 Mosaic Provider Portal

3.4.3 Systems

Return to table of
contents

Scope:
The Adult Social Care and Health (ASCH) Business Support Unit provides administrative, operational and business support to the three ASC divisions — Short Term Support, Long Term Support, and Adults Commissioning & Partnerships — underpinning statutory and operational service delivery across Kent.

Page 231
Does Disaggregation by default apply to this service? Yes
Why?

All six complexity drivers are rated Green and there is no reason the service is unsuitable for disaggregation by default. Business Support is an enabling in-house function with no statutory or safeguarding duties of its own; budgets are organised by function not geography, and no contractual, legislative or system barrier is identified. Workforce concentration risks are actively mitigated.

3.4.1 Business Support Unit

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview	Interdependencies
What makes this service complex to disaggregate? No critical complexity factors were identified, however the assessment flags some implementation considerations including: workforce concentration in specific knowledge holders nearing retirement age, single points of failure in some areas, and continued reliance on shared ASC specialist systems (Mosaic, IEG4, CACI Certa) - but none are rated as material complexity drivers and each is either mitigated or deferred to service-specific returns. The hybrid geographic footprint follows the services supported rather than imposing a Business Support-specific constraint. What are the potential risks of disaggregation that need to be considered? Considerations around workforce concentration and reliance on shared ASC systems are noted in the narrative but are not framed as material disaggregation risks; where they raise unresolved questions they are captured as clarification points in Next Steps rather than confirmed risks.	• Supports all ASCH services; demand follows those services • Shared ASC systems: Mosaic, IEG4 and CACI Certa • Staff co-located in buildings used by supported services • Limited external dependencies, restricted to shared operational sites
Next Steps/ Actions	
Now Map workforce distribution, system access and interdependencies across ASC services and future boundaries. Next Decide whether Mosaic, IEG4 and Certa stay shared, and confirm 2026/27 budgets. Future Design a governance model retaining flexible deployment and protecting statutory ASC outcomes.	

Scope:
Within ASCH Business Support, the team supports, develops and continuously improves the Mosaic Provider Portal, enabling collaboration between Adult Social Care and external care providers. Activity spans routine user support, complex system configuration for commissioning models, provider payments, audit resolution and disputed cases. Delivered in-house countywide.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies; all six drivers are Green. Demand is countywide with no geographic variation; delivery is a single in-house centralised function; budgets are countywide with no MTFP commitments; staffing is small with no regulated roles; asset dependency is limited to the portal; no direct statutory duties. Disaggregation must align with wider ASC operating model decisions.

3.4.2 Mosaic Provider Portal

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Although all drivers are rated Green, implementation considerations have been identified that make disaggregation non-trivial. The portal is embedded within wider ASC delivery, with extensive operational interdependencies across Financial Assessment & Income, Finance Revenue and Payments, ASC Performance, Commissioning, Arranging Support, Direct Payments, Long and Short Term support teams, the ASC Systems team, and DCED Technology which funds the system. Specialist knowledge combining ASC finance, Mosaic configuration and provider engagement is described as niche and takes time to build, with implications for replication or redistribution of roles if organisational structures change. Fluctuations in demand are event-driven, linked to commissioning change, system developments and provider digital capability rather than geography. Disaggregation of the portal must align with wider ASC system and operating model decisions rather than being progressed in isolation.

What are the potential risks of disaggregation that need to be considered?
The lead officer identified loss of consistency in approach and system use as a direct consequence of disaggregating the portal, given its role across the provider management and payment lifecycle. Furthermore, while roles do not require specialist training, qualification or regulation the niche combination of MPP software knowledge with arranging support and commissioning understanding is time-consuming to replicate, creating a knowledge continuity consequence during transition. Because the portal underpins financial and commissioning processes rather than statutory duties, the most material consequences relate to operating model coherence and provider-facing continuity, not statutory delivery. Any disaggregation decision therefore carries a consequence for how ASC financial and commissioning workflows are structured across future entities.

Interdependencies

- Financial, Finance, Performance, Commissioning, Arranging Support, Direct Payments teams
- ASC Systems team for configuration and administration
- DCED Technology funds the Mosaic Provider Portal system
- Mosaic Provider Portal contract and external care providers

Next Steps/ Actions

Now
Map critical ASC processes reliant on the Mosaic Provider Portal.

Next
Confirm portal ownership, contract scope and continued ASC use post-disaggregation.

Future
Align portal decisions with wider ASC operating, commissioning and finance models.

Scope:
The Adult Social Care Systems team administers and maintains ASCH's core case management systems — Mosaic, Kent and Medway Care Records (KMCR) and Certa. Operating countywide across all ASC areas, it manages user documentation, support requests, data amendments, provider and contract records, and access controls. Delivery is primarily in-house.

Does Disaggregation by default apply to this service? Yes

Why?

No strong reason prevents disaggregation by default. Complexity concentrates in Delivery and Staffing (Amber): a centralised countywide structure, contract ownership split between Systems and Technology, and a small 15.6 FTE workforce weighted to specialist KSG-and-above roles taking six months to build. Demand, Budget, Assets and Legislative are Green, with no direct statutory duties.

3.4.3 Systems

Complexity Driver RAG Assessment					
Demand (G)		●	Delivery Model (A)		●
Staffing (A)		●	Budget (G)		●
Assets/ Systems (G)		●	Legislative (G)		●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in Delivery Model and Staffing. The service is designed around a single, centralised, countywide function that configures, maintains and governs core ASC systems such as MOSAIC, KMCR and Certa, with contracts split between Systems and Technology and multiple supplier arrangements underpinning delivery. Extensive operational interdependencies exist across Financial Assessment & Income, Finance Revenue and Payments, ASC Performance, Commissioning, Arranging Support, Direct Payments and the Long and Short Term teams, as well as with Medway via KMCR. Staffing complexity arises from a small team with a high concentration of specialist roles requiring MOSAIC and ASC domain expertise that is difficult to recruit and takes at least six months to develop. Information was not provided regarding licensing structures, hosting models or technical constraints on system separation, which limits certainty over how cleanly the system estate can be split.
What are the potential risks of disaggregation that need to be considered? Concentration of specialist workforce knowledge and experience as a key consideration, noting that replicating this expertise across multiple organisations would present recruitment challenges, risk insufficient capability within smaller teams, and reduce resilience where knowledge is currently concentrated. Splitting the function could also reduce the ability to prioritise demand across the system, leading to duplication of effort and a less responsive service. Risks highlighted include divergence in system setup, data standards, processes and reporting across successor organisations, increasing governance, audit and reporting risk. Managing the same systems across multiple organisations could weaken strategic supplier relationships and add complexity to contract management, upgrades and change delivery, with the replication of system administration and governance likely to increase costs compared with the current single model. Transitional or shared arrangements are likely to be required at Vesting Day to maintain continuity of system governance, access management, configuration and contract oversight.

Interdependencies
• ASC finance, performance, commissioning, support teams rely on Systems team • Technology (DCED) holds majority of system contracts • The Access Group (Mosaic), CACI (Certa), Graphnet (KMCR) • Medway Council shares Kent and Medway Care Records
Next Steps/ Actions
Now Map contracts across Systems and Technology and clarify separation implications. Next Assess licensing, hosting and technical constraints and plan specialist workforce retention. Future Confirm successor system architecture and governance across ASC and Technology.

Table of Contents – CED – Public Health

4.1. Public Health

[4.1.1 Additional Public Health Functions – BSU](#)

[4.1.2 Additional Public Health Functions – Training](#)

[4.1.3 Portfolio Covering Public Health: Children, Young People, Families and Carers](#)

[4.1.4 Portfolio Covering Public Health: Healthcare and Long-Term Conditions](#)

[4.1.5 Portfolio Covering Public Health: Health Intelligence, Education and Training
and Research and Innovation](#)

[4.1.6 Portfolio Covering Public Health: Health Protection and Health Inequalities](#)

[4.1.7 Portfolio Covering Public Health: Lifestyle Services](#)

[4.1.8 Portfolio Covering Public Health: Sexual Health Services](#)

[4.1.9 Portfolio covering Public Health: Strategy and Partnerships](#)

[4.1.10 Portfolio covering Public Health: Substance Misuse and Mental Health](#)

[4.1.11 Public Health Commissioning](#)

Scope:
Within CED's Public Health division, Public Health Business Support provides administrative support across the Public Health function. It covers meeting management, recruitment administration, event coordination, emergency response correspondence, multi-agency coordination, and supports programmes including co-occurring conditions referrals and alcohol licensing. Delivered in-house countywide with hybrid working.

Does Disaggregation by default apply to this service? Yes
Why?

Disaggregation by default applies; all six drivers are Green. There is no statutory, contractual, asset-based or workforce barrier — a centrally delivered in-house administrative function with no complex contracts, no specialist regulated roles, and no legislative constraint on geography. Risks are operational rather than structural: maintaining consistent governance, avoiding duplication, protecting a small 7 FTE team.

4.1.1 Additional Public Health Functions: Business Support Unit

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

There is low complexity across all six drivers, so there are no material Red or Amber drivers to explain. Practical implementation considerations include the small 7 FTE team size (where any split risks sub-critical capacity or reduced resilience), operational interdependency with corporate Finance, HR, MRX and Analytics functions whose own disaggregation would need to be sequenced alongside this service, and shared digital arrangements including mailboxes, permissions and template libraries. Some coordination activity (emergency response support, multi-agency meetings, large events, supplier onboarding, external data sharing) is process-driven rather than geographically constrained, so it is not itself a barrier but would need consistent standards to be preserved across successor organisations.

What are the potential risks of disaggregation that need to be considered?

The service lead identifies four principal risks: teams being left without essential administrative support that impacts service delivery, duplication of processes across multiple smaller teams, inconsistent standards for governance and templates, and increased complexity for shared mailboxes and permissions. The operational sequencing risk given interdependency with corporate Finance, HR, MRX and Analytics functions, will need to be carefully considered. The service lead identifies opportunities alongside these risks, specifically clearer standard operating procedures and improved digital workflows and templates.

Interdependencies

- Corporate Finance, HR, MRX and Analytics functions
- Sessions House for storage, mailings, printing, events
- Recruitment software, Adobe Acrobat, shared mailboxes and permissions
- NHS/ICS, districts and providers for multi-agency meetings

Next Steps/ Actions

Now

Codify standard operating procedures and template libraries.

Next

Map shared mailbox, permissions and system access, sequenced with corporate functions.

Future

Maintain central coordination capacity and consistent standards across successor organisations.

Scope:
Within CED's Public Health division, the Public Health Training function designs and delivers workforce development across the internal workforce and system partners. Programmes include Making Every Contact Count (MECC), Public Health Champions training, alongside South East regional forums and NHS England partnership activity. The service is discretionary.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies. Demand is countywide and uniform, the budget is small and non-staffing focused, assets are standard, and the function is discretionary with no statutory duties or geographic mandate. Staffing is the main complexity: a small 4.5 FTE team including two NHS England-funded regional roles, where disaggregation risks sub-critical capacity and reduced resilience.

4.1.2 Additional Public Health Functions: Training

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in the Amber-rated Staffing driver, with the other five drivers Green. The team is very small at 4.5 FTE (2.5 KCC-funded, 2 NHS England-funded); two specialist posts deliver South East-wide workforce development programmes directed by NHS England but line managed by KCC, requiring teaching or training qualifications, substantial public health background and Public Health Practitioner Registration for one role. Capacity is already under pressure due to NHS England funding reductions across the South East. The Public Health Champions training contract (up to £30k per year, delivered twice annually across East and West Kent) runs until March 2027, with intent to recommission to vesting day. Budget is countywide and small, funded through Public Health reserves plus ad hoc NHS England and OHID grants. Systems complexity is minimal, limited to Slido as an interactive training tool. Legislative complexity is nil: MECC is aligned with the NHS Long Term Plan, NHS Contract and Kent and Medway ICB strategy rather than mandated by statute.
What are the potential risks of disaggregation that need to be considered? The service lead identifies the consequences as possible creation of multiple roles across different areas leading to increased staffing costs and duplication; smaller, fragmented teams less able to share expertise and maintain consistency; increased commissioning costs due to duplication; variation in quality and availability of training; and challenges maintaining a consistent regional presence and influence. The disaggregation of the small team could create sub-critical capacity, reduce resilience, and complicate the NHS England hosting arrangement for the two regional posts. Financial apportionment is a consideration given reliance on Public Health reserves and variable NHS England / OHID grants.

Interdependencies
- KCC Learning & Development team for training delivery - NHS England funds and directs two regional posts - Medway Council and Kent and Medway ICB for MECC - Public Health Champions training contract to March 2027
Next Steps/ Actions
Now Clarify impact of NHS England funding reductions on the regional posts. Next Confirm hosting of regional posts and sequence Champions contract recommissioning before 2027. Future Sustain consistent training access and the regional workforce development footprint.



Scope:
Kent County Council commissions a portfolio of 0-19 public health services within CED Public Health, delivering the National Healthy Child Programme through health visiting, school health, specialist infant feeding, therapeutic support, supervised toothbrushing. It also carries safeguarding leadership, quality assurance and the statutory Kent and Medway Child Death Overview Panel.

Does Disaggregation by default apply to this service? Part 237 Why?

The Child Death Overview Panel should remain a Kent and Medway arrangement because statutory guidance requires sufficient population scale to review child deaths effectively. Retaining the countywide panel best preserves compliance, expertise and continuity, while the wider 0–19 portfolio can follow the broader disaggregation approach.

4.1.3 Portfolio Covering Public Health Children, Young People, Families and Carers

(Including Children’s Safeguarding, Oral Health and Learning Disabilities)

Complexity Driver RAG Assessment					
Demand (A)			Delivery Model (R)		
Budget (A)			Assets/ Systems (G)		
			Staffing (R)		
			Legislative (R)		

Complexity Overview

What makes this service complex to disaggregate?
Demand is countywide but uneven, with early-years hotspots in Maidstone and Swale (circa 16,000 births per year countywide), population churn pressures in Dartford and Maidstone, higher National Child Measurement Programme (NCMP) follow-on need in Thanet, Swale, Folkestone & Hythe, Dover, Dartford and Gravesham, and supervised toothbrushing targeted in deprived areas. The delivery model is predominantly outsourced through NHS and voluntary sector providers, tightly integrated with the Family Hub network and underpinned by long-term contracts including a six-year health visiting, Family Partnership Programme and specialist infant feeding contract at £26.2m per year running to December 2031, plus school health (£5.3m/yr), therapeutic support (£1.07m/yr), targeted relationships (£212k/yr to September 2027), oral health promotion (£160k/yr), PAIRs (£443k rising to £530k/yr from March 2026) and MOUs on Integrated CYP Family Hubs (£4.5m/yr) and Youth Justice (£306k/yr). Legislative complexity is driven by mandated health and development reviews, the National Child Measurement Programme, CDOP statutory requirements, and forthcoming national reforms. Budget complexity focusses on a substantial £40.36m portfolio funded primarily through the ring-fenced Public Health Grant (£38.59m), Best Start in Life DfE grant (£1.74m/yr to 2028/29), and an MTFP commitment to increase CYP MOUs by £1m per annum for 2026/27 to 2028/29.

What are the potential risks of disaggregation that need to be considered?
The service lead identifies increased delivery, infrastructure and management costs within a constrained budget as a primary risk, with the possibility that smaller successor services become financially unviable and provision narrows to mandated elements. Loss of flexibility and resilience is flagged as reducing the ability to meet demand and maintain business continuity. Fragmentation, siloed working and inequitable access are identified as risks even under place-based models, alongside potential disruption to partnership working and care pathways. Digital and information governance burden could increase materially through multiple data-sharing agreements and DPIAs, and triage and referral systems (notably therapeutic support) may be destabilised if not managed across whole services. Workforce capacity and stability risks would be exacerbated by organisational change. For CDOP specifically, disaggregation is evidenced as unable to meet statutory guidance on scale, which is why a countywide arrangement is recommended for that part of the service.

Interdependencies

- Public Health Commissioning, Finance, Performance, Analytics, Procurement functions
- MRX communications team; Strategic Financial Advisor, Analytics
- Family Hubs and Libraries as critical shared community estates
- NHS providers (£26.2m/yr to 2031);
- Medway and ICB for CDOP

Next Steps/ Actions

Now
Map contractual flexibility across all commissioned 0-19 contracts and MOUs.

Next
Plan Family Hub estate continuity and confirm data-sharing, DPIA and retention arrangements.

Future
Preserve CDOP statutory scale, specialist workforce and safeguarding leadership across successors.

Scope:
The Public Health portfolio led by Sarah Crouch provides professional advice and system leadership across Kent to improve population health and reduce inequalities. It covers Healthcare Public Health, Long Term Conditions, Elderly Care, the Adult Social Care Prevention Framework, Gypsy Roma Traveller inclusion work and wider system leadership.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies; no statutory, contractual, financial or asset barrier prevents separation, and legislation sets no fixed geographic delivery requirement. The hybrid model combines countywide strategic leadership with place-based delivery tailored to local need. Ongoing Social Prescribing transformation (Jan 2026–Jan 2027) and Medway’s separate DPH and Public Health team are considerations.

4.1.4 Portfolio Covering Public Health Healthcare and Long-Term Conditions (Including Elderly Care and Prevention Framework)

Complexity Driver RAG Assessment		
Demand (A)	Delivery Model (A)	Staffing (R)
Budget (A)	Assets/ Systems (A)	Legislative (G)

Complexity Overview
What makes this service complex to disaggregate? Demand is countywide but uneven, with higher intensity in deprived and coastal areas (Thanet, Swale, Dover, Folkestone and Hythe) and urban areas with larger older populations, alongside less visible rural demand linked to access and isolation, and complex needs including multimorbidity, frailty, mental health and social isolation. Delivery is a hybrid model combining in-house strategic leadership and commissioning with partnership delivery, dependent on multiple internal and external partners (NHS ICB, PCNs, Adult Social Care, districts, VCSE, communications, finance and analytics). Staffing complexity reflects 8 Public Health Consultants (7.4 FTE) and 17 Public Health Specialists whose roles require Master’s-level qualifications, UKPHR or GMC registration, 5-yearly revalidation and up to 5 years to train, alongside specialist shortages and recruitment challenges. Budget complexity reflects centrally managed funding, mainly the Public Health Grant (£6.16m staffing) plus NHS funding, PH reserves and external income (£522k), deployed flexibly by need rather than fixed geographic allocation. Assets/Systems complexity centres on shared digital platforms (Joy Connect, Joy Marketplace, Joy Insights, Kent Connect to Support, ReferKent) and reliance on data-sharing agreements, DPIAs and governance protocols across NHS, councils and VCSE. What are the potential risks of disaggregation that need to be considered? Fragmentation and inconsistency, loss of countywide leadership and economies of scale, reduced alignment across the system, variation in local capacity and increased inequalities, workforce and delivery pressures, and increased complexity in digital, data and governance arrangements are the primary risks. A disaggregated structure could strengthen local ownership but may reduce economies of scale and make it harder to sustain consistent partnership working, intelligence and prioritisation across the system. Specialist workforce risk is material given shortages of Public Health specialists, revalidation requirements and up to 5-year training pathways, meaning the current at-scale but narrow model would need to shift to local but broad expertise across successor authorities. Contractual sequencing is a further consequence given end dates spanning February 2027 (Joy), March 2028 (University of Greenwich) and April 2028 (Involve Kent). The presence of a separate Medway DPH and Public Health team, and the current £300k MRX-embedded Public Health communications team, add cross-authority coordination consequences that would need to be resolved.

Interdependencies
- Adult Social Care, transport, planning, housing, Active Kent, districts - MRX communications team; Strategic Financial Advisor, Analytics - NHS partners (ICB, PCNs); Medway Council unitary - VCSE, districts and shared digital platforms (Joy, ReferKent)
Next Steps/ Actions
Now Map live contract end dates and sequencing constraints (February 2027–April 2028). Next Assess Consultant and Specialist distribution and plan digital platform separation or sharing. Future Sustain specialist capacity and balance countywide leadership with place-based partnership delivery.

Scope:
Within CED's Public Health division, this portfolio combines Health Intelligence, Education and Training, and Research, Innovation and Improvement to provide an integrated, system-wide evidence base supporting decision-making, commissioning and population health improvement across Kent. It includes the Kent Public Health Observatory, applied research and workforce development, delivered in-house countywide.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies; no statutory, contractual or operational barrier mandates a single countywide structure, and analytical, research and education functions are not tied to fixed geographies. Complexity sits in transition: the operating model, potential loss of critical mass, weakened evidence base, and scarce regulated staff. Medway operates its own analytics team.

4.1.5 Portfolio Covering Public Health Intelligence, Education and Training and Research and Innovation

Complexity Driver RAG Assessment			
Demand (G)		Delivery Model (A)	
Staffing (R)			
Budget (A)		Assets/ Systems (G)	
		Legislative (G)	

Complexity Overview

What makes this service complex to disaggregate?

Delivery is through a countywide, in-house model, with all functions reliant on the central Public Health team, DPH and Public Health Consultants. KPHO is hosted by Kent Analytics. Research, innovation and improvement (RII) operates via project-specific MoUs and contracts and is fully externally funded. Education and Training depends on partnerships with deaneries, universities, NHS trusts and training programmes, supporting 30–40 placements annually. Budget is managed on a countywide basis, with £7.7m of 2026/27 staffing funding across Public Health, financed through the Public Health Grant, external income and reserves. Non-staffing budgets are minimal (£11k for KPHO); RII is fully externally funded, and Education and Training has no non-staffing allocation. Assets/Systems complexity, though Green-rated, includes analytical software (SPSS, R, Stata, NVivo, Qualtrics, REDCap, Stella Architect at c.£3,500 per year for 5 licences), the Kent and Medway Care Record pseudonymised linked dataset, partner-hosted data environments and UK GDPR-compliant data sharing agreements. Forthcoming Data (Use and Access) Act 2025, CQC assurance framework (from 2026), PH grant settlement changes and national research system reforms will increase governance and assurance requirements.

What are the potential risks of disaggregation that need to be considered?

The service lead identifies the consequences as loss of critical expertise; reduced ability to meet demand; recruitment and retention challenges; increased costs and duplication; reduced success in securing external research funding; inconsistent approaches and increased risk; and reduced negotiating power with NHS, academic and training partners. Medway Council's existing analytics team creates further consideration for any disaggregation or shared service option.

Interdependencies

- Central analytics reporting into Public Health team, DPH, Consultants
- Kent Analytics hosts KPHO; MRX communications team
- NHS, academia, NIHR, ARC, HIN and training bodies
- KMCR linked dataset; externally funded RII contracts

Next Steps/ Actions

Now

Map specialist workforce against successor authority capacity.

Next

Confirm governance for KMCR access, software licensing and externally funded RII activity.

Future

Preserve integrated evidence base, analytical quality and partnership relationships.

Scope:
This portfolio covers Deputy Director of Public Health leadership; Health Protection, Infection Prevention and Control, Emergency Preparedness, resilience and response (EPRR) and pandemic planning; Wider Determinants of Health; Inequalities and the Marmot Coastal Region Programme; and Pharmacy and Quality. Delivery is countywide, with statutory duties spanning health protection, EPRR, the Pharmaceutical Needs Assessment and licensing.

Does Disaggregation by default apply to this service? Yes

Why?

No whole-service statutory, contractual, financial or asset barrier exists. Staffing is Red because specialist, professionally regulated roles — Consultants in Public Health, Public Health Specialists, clinical IPC staff and pharmacy expertise — are concentrated in few individuals, but this is an implementation consideration, not a barrier. Delivery, Demand, Budget and Legislation are Amber.

4.1.6 Portfolio Covering Public Health Protection and Health Inequalities

(Includes Emergency Preparedness, resilience and response, Marmot Programmes, Wider Determinants and DDPH role)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Staffing is the primary complexity driver. The service depends on a small, professionally regulated specialist cohort including 8 Consultants in Public Health (7.4 FTE) and 17 Public Health Specialists with UKPHR and/or GMC registration, five-year revalidation, and lengthy training pathways, alongside noted recruitment challenges and the need to consider Medway's existing Director of Public Health and Public Health team in any future arrangement. Delivery is coordinated centrally and depends on flexible deployment to reactive areas such as health protection, infection prevention and control, and emergency preparedness alongside an out-of-hours rota staffed by consultants and the DPH/DDPH. Demand is countywide but uneven, concentrating in coastal communities, areas of inequality and high-risk settings such as care homes and refugee accommodation, and combines universal work with specialist reactive response. The legislative context adds further complexity through statutory responsibilities across health protection, EPRR, Pharmaceutical Needs Assessment and licensing.

What are the potential risks of disaggregation that need to be considered?

The service lead identifies loss of capacity and unclear accountability, slower decision-making, and amplification of existing pressures in Health Protection and EPRR as the primary risks of separation. Loss of scale and efficiency, along with duplication of infrastructure and overheads, are identified consequences of replicating specialist teams across smaller footprints. Fragmentation of evidence and evaluation, through inconsistent data collection across successor bodies, is flagged as a specific consequence, alongside loss of scale and impact for the Marmot Coastal Region Programme. Replication of specialist pharmacy capacity and further complexity in the pharmacy commissioning environment are also noted. Diversion of capacity during transition is identified as a further risk. The assessment notes opportunities in increased local ownership and interventions tailored more closely to local need.

Interdependencies

- Adult Social Care, Children's Services, Resilience & Emergency Planning
- MRX Public Health communications team; Strategic Financial Advisor, Analytics
- NHS, UKHSA, Environment Agency, Kent and Medway Resilience Forum
- UCL Institute of Health Equity contract, ending December 2026

Next Steps/ Actions

Now

Map specialist consultant, IPC nurse and pharmacy roles against successor footprints.

Next

Confirm how emergency response capacity, statutory Health Protection and EPRR responsibilities will be maintained through transition.

Future

Sustain specialist capability, deprivation-based targeting and reactive health protection capacity including accountability during incidents spanning multiple authorities.



Scope:
The Healthy Lifestyles and Communities team provides countywide public health system leadership across Kent, developing strategy, health intelligence and research, commissioning services and coordinating whole-system partnerships to address smoking, obesity, physical inactivity and wider inequalities. Provision is universal but targeted toward areas of deprivation, delivered in-house alongside commissioned services.

Does Disaggregation by default apply to this service? Yes

Why?

No statutory, contractual, financial or asset barrier prevents separation. Legislative duties shape delivery without prescribing a single organisational model; budgets are grant-funded and centrally managed rather than indivisible, and provider assets sit largely outside the core team. Separation requires careful implementation: countywide leadership, specialist capacity, ring-fenced grant conditions, high contract volume and extensive NHS dependencies.

4.1.7 Portfolio Covering Public Health Lifestyle Services

(Including Primary Care, Stop Smoking Services and Communities)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? The service depends on a small, professionally regulated specialist cohort with UKPHR and/or GMC registration, five-year revalidation, and lengthy training pathways, alongside noted recruitment challenges. The current PH model of delivery works through single Consultants as portfolio subject specialists working across the whole of Kent. Delivery model complexity reflects a countywide operating structure underpinned by centralised needs assessment, epidemiology, commissioning advice, quality assurance, surveillance and clinical governance, supported by shared analytics, procurement, MRX communications and business support. Contract volume adds further complexity, including around 100 GP and pharmacy contracts and multiple large provider arrangements. Budget complexity arises from a ring-fenced Public Health Grant with deprivation-based targeting rather than area-based allocation, while demand complexity (Amber) reflects the need to combine universal countywide reach with targeted intervention in higher-need places. What are the potential risks of disaggregation that need to be considered? Disaggregation carries a risk of duplicating strategy and policy development across successor authorities, with associated pressure on an already stretched specialist workforce and further recruitment challenges for Public Health specialists. There is a specific risk of losing health intelligence capability and the systems that underpin it, which would weaken the ability to assess need and target investment. Established relationships with the ICB and other Kent-level organisations could be disrupted, affecting partnership delivery across NHS and system-wide programmes. Economies of scale in commissioning and specialist expertise may be reduced, with a consequent impact on commissioning efficiency and contract management capability. These consequences suggest a need to explore how specialist capability, continuity and consistent standards could be sustained across any future operating model.

Interdependencies
- Public health analytics, commissioning, procurement, corporate finance, HR - MRX Public Health communications team; Strategic Financial Advisor, analytics - Around 100 GP and pharmacy contracts delivering services - Kent LMC and LPC; OHID and NHSE
Next Steps/ Actions
Now Map around 100 GP and pharmacy contracts against 2028–2031 review dates. Next Clarify workforce transfer arrangements and continued regulation and professional oversight of Public Health Consultants, taking account of existing capacity within Medway’s PH function Future Confirm arrangements required to preserve effective countywide leadership, health intelligence and needs-based targeting of resources in future models.



Scope:
The Sexual Health portfolio is a statutory public health function delivering open-access sexual and reproductive health services across Kent, including STI testing and treatment, contraception, and advice. Services are commissioned via clinical providers with strong NHS interdependencies, while an in-house team leads commissioning, needs assessment, partnerships and system-wide coordination.

Does Disaggregation by default apply to this service? Yes

Why?

The service can be disaggregated. Complexity concentrates in transition: a hybrid commissioning model with large live East and West Kent contracts, a specialist professionally regulated workforce facing recruitment pressures, open-access statutory duties that must be preserved regardless of residency, and NHS partnership arrangements including shared HIV commissioning. Disaggregation requires careful sequencing and governance redesign.

4.1.8 Portfolio Covering Public Health Sexual Health Services

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Delivery model is the strongest complexity driver: commissioning, contract management, performance monitoring, and strategic oversight sit countywide, while clinical delivery is split geographically through large East and West Kent Integrated Sexual Health Services contracts, alongside subcontracted countywide services (online testing, condom programme, psychosexual therapy) and NHS interdependencies including a Section 75 agreement for HIV. Staffing complexity is equally material, with delivery reliant on Consultants in Public Health, roles that are professionally regulated and require up to five years of specialist training. The current PH model of delivery works through single Consultants as portfolio subject specialists working across the whole of Kent. Demand adds a further layer of complexity, being countywide but uneven across districts and shaped by both population need and clinic distribution, with tailored pathways for young people, LGBTQ+ communities, homeless populations, and those with co-occurring mental health or substance use needs. Budget complexity is moderate: Public Health Grant funding, NHS funding for HIV, activity-based payments, and cross-charging for out-of-area use, combined with staffing budgets held at divisional rather than service level, reduce transparency for service-place specific costing.

What are the potential risks of disaggregation that need to be considered?
The loss of scale and efficiency is the primary consequence, alongside workforce sustainability challenges given the specialist and regulated nature of key roles. Duplication and reduced viability of services are flagged where separation could undermine the clinical mass needed to sustain specialist provision, and inequality of access, is identified as a direct risk to open-access statutory duties. Fragmentation of the open-access system, reduced operational flexibility, and increased governance burden are also raised as material consequences of separating a portfolio currently held together through countywide commissioning and NHS partnership. Estate limitations are noted as they are reliant on Provider arrangements, reflecting the need to access distributed clinical sites, some located in NHS or leased properties rather than KCC estate.

Interdependencies

- Commissioning, safeguarding, finance and analytics functions
- MRX Public Health communications team for campaigns
- NHS England, Kent and Medway ICB, primary care
- Section 75 HIV agreement; NHS Property Services; district councils

Next Steps/ Actions

Now
Map contract terms, expiry dates and recommissioning timelines against transition milestones.

Next
Confirm assignment of open-access statutory duties and shared HIV Section 75 arrangements.

Future
Preserve clinical viability, equitable access and specialist workforce pipelines across districts.

Scope:
This portfolio delivers place-based public health leadership across Kent to improve health outcomes and reduce inequalities. It supports local strategies, prevention and the wider determinants of health, focusing on Local Health Alliances, Neighbourhood Health and the Neighbourhood Health Plan, and underpins Health and Wellbeing Board development.

Does Disaggregation by default apply to this service? Part
Why?

The District Partnership Coordination function of the portfolio is contingent on the current two-tier model of local government, which will no longer apply. Consideration will need to be given to how this element of the service should be managed through the LGR process. Future partnership coordination arrangements could be re-established across the new unitaries as required.

4.1.9 Portfolio covering Public Health Strategy and Partnerships

(New Models of Care, Health and Wellbeing Board development and District/Borough implementation)

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

The complexity is primarily associated with the District Partnership Coordination role within this portfolio, which has been designed to support the current two-tier model of local government. As these arrangements will no longer apply under a unitary structure, consideration will be required to determine how partnership coordination responsibilities are transitioned into future arrangements. This complexity is driven by both Staffing and Service Delivery factors, reflecting the specialist relationship-management skills within the team and the current delivery model, which is aligned to district-based partnerships and networks. While the other functions of this portfolio are disaggregatable, complexity exists in extensive partnerships, including with the NHS and specialist Public Health Consultant capacity due to the time needed to develop expertise, professional regulatory and revalidation requirements.

What are the potential risks of disaggregation that need to be considered?

The principal risk identified is that a straightforward disaggregation of the District Partnership Coordination element would not effectively fit the future operating environment: the function's current design reflects the existing two-tier model. Careful consideration will be needed to determine how the activity this function supports is delivered in future. There may continue to be a requirement for coordination across the new unitary authorities, or for place-based partnership arrangements operating at town, locality or neighbourhood level to support health and wellbeing priorities and local health alliances.

Interdependencies

- Wider Public Health function and MRX communications team
- Strategic Financial Advisor and Analytics via Public Health Grant
- District, borough and Medway councils steer local work
- NHS partners; Health and Wellbeing Board; OPCC, KALC, VCSE

Next Steps/ Actions

Now

Confirm the post-LGR Public Health operating model for Kent and Medway.

Next

Determine the most appropriate future arrangements for Partnership Coordination, taking account of new governance and partnership requirements

Future

Sustain system leadership, Neighbourhood Health and accountability for outcomes across new unitaries.

Scope:
This portfolio delivers consultant-level public health leadership for public mental health, substance misuse, suicide prevention and gambling harms across Kent and Medway. It covers needs assessment, surveillance, quality improvement, prevention, governance and partnership leadership across the NHS, criminal justice, housing and VCSE sectors, combining in-house leadership with externally commissioned delivery.

Does Disaggregation by default apply to this service? Yes

Why?

No evidence of a whole-service hard constraint against default disaggregation. Operational delivery is already partly disaggregated by place — Live Well Kent & Medway commissioned through four geographic lots, and adult drug and alcohol treatment let through separate East and West Kent contracts — so place-based delivery is established. Complexity sits at the strategic layer.

4.1.10 Portfolio covering Public Health Substance Misuse and Mental Health

(Includes Domestic Violence, Adult Safeguarding, Gambling Harms)

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (R)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Demand is geographically uneven and linked to deprivation, with concentrated volume and complexity in East Kent, Medway and Swale, and hidden need in rural areas; much activity involves co-occurring mental health and substance misuse, safeguarding, homelessness and criminal justice involvement, requiring specialist, trauma-informed responses. Funding is pooled and multi-source, particularly for Live Well Kent & Medway, drawing on KCC Public Health and Adult Social Care, the ICB, Medway Council and the Mental Health NHS Trust, creating financial interdependence rather than standalone budgets. The hybrid model combines centralised strategic leadership with hyperlocal delivery and material interdependencies with NHS, criminal justice and safeguarding partners, including a tri-council inpatient detoxification consortium with Oxfordshire and Surrey. Legislatively, substance misuse services are statutory under Public Health Grant conditions and mental health functions carry statutory safeguards under the Mental Health Act 1983 and NICE suicide prevention guidance, requiring clear accountability and governance.

What are the potential risks of disaggregation that need to be considered?

There is a risk of reducing the ability to compare need across areas, tackle inequalities coherently, maintain consistent quality standards and coordinate countywide issues such as suicide prevention, safe communications and real-time surveillance. It would also challenge the consultant public health role in providing peer-to-peer advice across the NHS, local government and wider partnerships. For substance misuse, unified oversight of treatment quality, provider market sustainability, medicines-related risk, recovery pathways and drug and alcohol death prevention could be undermined by fragmented accountability. Suicide rates are sensitive to small numerical changes, meaning aggregated intelligence and system-wide interpretation matter when redistributing strategic functions. Financial interdependence with the ICB, NHS Trust and Medway Council for Live Well Kent & Medway also means disaggregation carries transitional consequences for pooled funding.

Interdependencies

- Public Health Commissioning, Analytics, Strategic Financial Advisor, communications team
- Adult Social Care, children's services, domestic abuse, housing
- Kent & Medway ICB and Mental Health NHS Trust
- Oxfordshire/Surrey tri-council inpatient detoxification consortium, Bridge House

Next Steps/ Actions

Now

Map contract end dates (2027–2029) for novation, variation or expiry.

Next

Design transitional governance for suicide surveillance, drug-death reviews and safeguarding oversight.

Future

Sustain specialist leadership, pooled funding continuity and system-wide learning across organisations.

Scope:
Within CED's Public Health division, the Public Health Commissioning team commissions a wide range of public health services for Kent residents focused on prevention, early intervention and reducing inequalities. Services span all ages, including lifestyle, substance misuse, sexual health, domestic abuse, mental wellbeing and children and young people's services.

Does Disaggregation by default apply to this service? Yes
Why?

Disaggregation by default applies; there is no whole-service hard constraint or statutory prohibition. The single countywide arrangement reflects flexibility, scale and specialist capability rather than legal requirement. Feasibility depends on the wider Public Health operating model for Kent and Medway, alongside ASC and CYPE Commissioning, and on managing c.60 five-year contracts referencing LGR.

4.1.11 Public Health Commissioning

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is spread across Demand, Delivery, Budget and Staffing. Demand is not geographically driven but is consistently complex and non-standardised, spanning universal, clinical, mandated and safeguarding-related activity across CQC-registered provision and interventions from tiers 1 to 4, and shaped by the commissioning cycle stage, performance issues, inspections, provider failure, emerging events and time-limited funding pressures. Delivery is a centrally coordinated in-house function with staff organised thematically rather than geographically, reliant on matrixed centrally funded specialist and embedded partnerships with NHS, ICB, Police, Probation, districts and Medway Council, including jointly funded posts, shared referral pathways and single points of access such as domestic abuse. Budget complexity comes from mixed Public Health Grant (ringfenced), KCC base contributions, ASCH management contribution, Department for Education Best Start for Life grant and partner income from the ICB (including Section 75 arrangements for HIV services), with time-limited posts extending beyond LGR go-live. Staffing complexity reflects a substantial workforce with 34.8 of 39.8 FTE at KSG and above, recruitment challenges for Commissioner and Senior Commissioner roles and a reliance on experiential knowledge and thematic specialisms. The contract landscape adds further complexity: c.60 five-year contracts predominantly going live January or April 2026 with LGR clauses, two Kentwide GP and pharmacy frameworks with hundreds of localised call-offs, and a combined annual value of approximately £89.7m.

What are the potential risks of disaggregation that need to be considered?
The service lead identified dilution of expertise, reduced continuity, increased costs and duplication; loss of economies of scale, market instability, increased contract management burden, interoperability risks, workforce disruption and fragmented pathways. Recent Public Health Service Transformation Programme contracts have just gone live making further changes to delivery models or contracts at this stage disruptive and premature. Legislative consequences include potential challenges under the Procurement Act best-value requirement if contracts are split in a way that undermines economies of scale, effective partnership working or the overall public benefit, and Equality Act / Public Sector Equality Duty concerns if fragmentation disadvantages certain groups or areas..

Interdependencies

- Legal, Commercial and Procurement, Performance, Analytics, KPHO functions
- ASC Commissioning, CYPE Commissioning; safeguarding across ASCH, CYPE, GET
- NHS and ICB for jointly funded posts (Section 75)
- Police, Probation, districts and Medway Council as partners

Next Steps/ Actions

Now
Map matrixed specialist support roles (Performance, Analytics, Procurement, KPHO) and separability.

Next
Align decisions with the wider Public Health operating model and contract go-lives.

Future
Sustain specialist commissioning capability, embedded partnerships and Equality Act compliance.



5.1 CED/DCED

[5.1.1 Arranging Support Team](#)

[5.1.2 Capital and Strategic Projects](#)

[5.1.3 Domestic Abuse Service](#)

[5.1.4 Early Years Funding](#)

[5.1.5 Facilities Management to Schools](#)

[5.1.6 Finance Operations - ASC Finance Assessment](#)

[5.1.7 Finance operations – Exchequer](#)

[5.1.8 Finance Operations – Schools Funding and High Needs Funding](#)

[5.1.9 Home to School Transport Appeals](#)

[5.1.10 Kent and Medway Safeguarding Adults Board \(KMSAB\)](#)

[5.1.11 Kent Safeguarding Children Multi-agency Partnership \(KSCMP\)](#)

[5.1.12 MRX: Customer Service Delivery](#)

[5.1.13 Permanent School Exclusion Appeals](#)

[5.1.14 Portfolio Management - Financial Hardship Programme](#)

[5.1.15 Portfolio Management - Refugee Resettlement Programme](#)

[5.1.16 Portfolio Management - Ukraine Refugee Response Programme](#)

[5.1.17 Resilience and Emergency Planning](#)

[5.1.18 School Appeals](#)

Return to table of
contents

Scope:
KCC's Arranging Support service sources, purchases and sets up agreed care and support for adults following assessment and support planning. Operating countywide across community, hospital discharge and placements pathways, it arranges home-based care, residential and nursing placements and other commissioned services. Statutory activity supports Care Act duties. Flexible countywide deployment enables the service to respond to provider failure, care home closures and hospital discharge pressures.

Does Disaggregation by default apply to this service? Yes

Why?

Disaggregation by default applies to Arranging Support. No legislative, asset, systems or contractual constraint prevents separation; staffing is broadly non-specialist and non-regulated, and assets/systems are modular using standard infrastructure. Red ratings on Demand and Delivery reflect uneven, volatile demand, reliance on flexible countywide deployment and unevenly distributed care-market capacity—consequences to manage during transition, not barriers.

5.1.1 Arranging Support Team

Complexity Driver RAG Assessment					
Demand (R)	●	Delivery Model (R)	●	Staffing (G)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview
What makes this service complex to disaggregate? Demand is uneven and volatile: activity is materially higher in Thanet & South Kent Coast and West Kent than in Ashford and Canterbury, and can spike rapidly due to provider handbacks, care home closures and hospital pressures. Over the last five months the service has responded to six care home closures affecting approximately 50 people. Complex placements, including bariatric, mental health, learning disability and physical disability provision can be difficult to source due to limited specialist market capacity and restrictions arising from safeguarding concerns, sanctions or CQC ratings. The delivery model depends on flexible, countywide deployment of staff and countywide referral allocation, meaning smaller footprints could weaken the ability to redistribute capacity in response to localised spikes. Budget presents an evidence gap, with staffing and non-staffing budgets for 2026/27 unconfirmed pending the service's move from ASCH, limiting assessment of financial implications. The Joint Brokerage Team's health-funded status until November 2027 introduces a time-limited partnership dependency relevant to transition sequencing. Staffing, assets and legislative drivers do not, on the evidence available, add material complexity in their own right. What are the potential risks of disaggregation that need to be considered? Ring-fencing capacity to defined geographic areas could reduce the service's ability to redeploy staff rapidly during localised demand spikes, with the assessment noting potential delays in arranging care and increased risk of delay in arranging care for people with urgent needs, which successor arrangements would need to mitigate. Determining the correct workforce capacity for each future area is challenging because staff currently undertake a range of roles across pathways and geographies. Smaller operating footprints may not align with the geographic distribution of care market provision, creating mismatches between assessed needs and locally available placements, greater reliance on cross-boundary placements, reduced choice and delays in securing suitable support. The Joint Brokerage Team's health-funded partnership until November 2027 creates a sequencing consequence, as arrangements for hospital discharge purchasing may need to be revisited alongside any structural change. The absence of confirmed 2026/27 budget figures limits confidence in modelling the financial consequences of separation.

Interdependencies
• ASC assessments and support planning generate demand • Commissioning colleagues shape provider contracts for sourcing • Care home providers, homecare providers and specialist placement providers determine available capacity • CQC ratings, safeguarding concerns and provider sanctions can significantly impact sourcing options • NHS Joint Brokerage (health-funded to Nov 2027); out-of-county placements
Next Steps/ Actions
Now Confirm 2026/27 budgets following the move from ASCH. Next Map care market supply against footprints and clarify Joint Brokerage transitional governance. Future Preserve responsiveness to demand spikes and continuity of Care Act sourcing.



Scope:
Oversees KCC's major capital investment and strategic programmes supporting education, children's services and all statutory functions requiring a place-based corporate estate. The service delivers Major Works (typically over £1m), Minor Works (c £10k–£1m) and Strategic Programmes (from £10k), covering cross-service delivery across schools, specialist provision, in-house residential care and public buildings.

Does Disaggregation by default apply to this service? Yes

Why?

The service can be disaggregated: countywide delivery reflects project volume, nature and specialisation, not a structural obstacle. Staffing, capital programmes, funding streams and estate can be allocated between successor authorities, subject to workforce and procurement design.

5.1.2 Capital and Strategic Projects

Complexity Driver RAG Assessment			
Demand (A)	●	Delivery Model (A)	●
Staffing (A)	●		
Budget (A)	●	Assets/ Systems (G)	●
Legislative (A)	●		

Complexity Overview
What makes this service complex to disaggregate? Demand is countywide, uneven in geographic distribution (higher concentration of community assets in west Kent, variable estate size and condition) and specialist by project type, spanning Minor Works, Major Works, Strategic Programmes and Quality Assurance, each with distinct technical, legal, governance and safeguarding requirements. The delivery model is centrally coordinated and depends on scale - the Skanska FM contract, KCC Construction Partnership Framework and KCC Construction Consultancy Framework leverage KCC's buying power, and how these arrangements operate in a multi-unitary scenario is unclear. Staffing complexity arises from concentrated specialist knowledge, competition with the London employment market and stated single-points-of-failure. Budget complexity reflects mixed funding streams (internal capital, DfE grants, PSDS, s106, pooled CIL) and the absence of a detailed place-based breakdown. Legislative complexity arises from the range of active and forthcoming policy changes (NPPF revisions, BNG, Families First, SEND/SEMH, school-based nursery provision, building regulations, ICB integration, DfE enhanced condition data) that successor authorities would need to interpret and apply consistently. What are the potential risks of disaggregation that need to be considered? Potential loss of economies of scale is a primary risk, given KCC's current buying power in construction procurement frameworks and the direct link between scale and cost efficiency in the Skanska FM contract. Fragmentation of pupil place planning across successor authorities is identified as an operational risk, with an explicit comparison drawn to the current KCC/Medway boundary experience. Loss of specialist knowledge is a material workforce consequence: subject-matter experts in heritage, care accommodation, M&E and building fabric defects may sit in only one successor authority, and three successor authorities recruiting simultaneously would intensify recruitment and retention pressures already noted against the London market. Increased administrative burden and duplication of roles across smaller geographies is highlighted as a further consequence.

Interdependencies
• Infrastructure business support, in-house Legal, Procurement and Quality Assurance teams. • Supports all place-based statutory services and KCC estate. • Skanska FM contract; Construction Partnership and Consultancy Frameworks. • DfE and education partners; districts, Local Planning Authorities, ICB
Next Steps/ Actions
Now Map specialist roles, single points of failure and retirement risk. Next Agree how capital programmes, grants and development contributions will be allocated and governed. Future Determine future operating arrangements for KCC procurement frameworks and Skanska FM contract.

Scope:
Kent County Council's Domestic Abuse portfolio provides strategic leadership, partnership coordination, commissioning and oversight of domestic abuse services across Kent. Frontline provision covers community-based and accommodation-based support for adults and children, underpinned by statutory duties in the Domestic Abuse Act 2021.

Does Disaggregation by default apply to this service? No
Why?

Domestic Abuse should remain countywide as the transformation of KIFDAS embeds from April 1st 2028. Statutory safeguarding duties, pooled funding and multi-agency governance make disaggregation high risk at this time. The recommendation is to maintain a countywide arrangement through procurement and mobilisation, preserving continuity until the integrated service is fully operational.

5.1.3 Domestic Abuse

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (G)	●
Budget (R)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in the Red-rated Delivery Model, Budget and Legislative drivers, reinforced by an Amber Demand rating. Delivery operates as a single interconnected system: countywide integrated contracts (KIDAS, SASS and SAFER), pooled funding, shared governance and multi-agency pathways such as MARAC mean the service cannot be readily separated into discrete units without disrupting established referral routes and provider arrangements. A time-critical transformation to the Kent Integrated Family Domestic Abuse Service (KIFDAS) is already underway and is moving through Governance, with procurement launching in October 2026 and full operation required by 1 April 2028, which itself constrains the scope for parallel disaggregation. The pooled countywide budget, combining ringfenced MHCLG grant, KCC core budgets and contributions from OPCC, ICB, KFRS, District Councils and Public Health, is managed and reported centrally, with no area-based allocation to unpick. Statutory safe accommodation duties under the Domestic Abuse Act 2021, together with wider safeguarding legislation, require system-wide needs assessment, commissioning and reporting, and demand is unevenly distributed across Kent with higher prevalence and complexity in urban and deprived areas of North and East Kent. What are the potential risks of disaggregation that need to be considered? Disaggregation would risk breaking established countywide referral pathways and integrated service models, producing a less seamless experience for victims at a point of acute risk. Divergent service models, eligibility criteria and funding levels across successor bodies could create variation in access and outcomes between areas, while reduced commissioning scale threatens provider market stability and value for money. The coordinated community response with Police, Health, Housing and VCSE partners could be weakened where governance, commissioning and accountability are split, and duplication of commissioning, analytics and procurement roles would increase overheads. Specialist expertise held by a small senior team is highlighted as vulnerable to dilution if fragmented across multiple organisations. Most acutely, restructuring during the KIFDAS transition period carries a specific service disruption risk for high-risk victims and could adversely affect the Council's ability to meet its statutory safeguarding duties.

Interdependencies
• ASC, Children's Services, Public Health, Community Safety, Kent Analytics • MHCLG £4.1m ringfenced grant and statutory reporting • OPCC, ICB, KFRS and nine District Councils co-funding • Commissioned providers (KIDAS, SASS, SAFER); MARAC multi-agency data
Next Steps/ Actions
Now Confirm that KIFDAS procurement proceeds ahead of reorganisation and map commissioned service supply and demand distribution across Kent districts. Next Confirm interim safeguarding governance. Future Preserve countywide pathways, MARAC and pooled funding while enabling local responsiveness.



Scope:
Early Years Funding is KCC's Finance function responsible for administering Dedicated Schools Grant payments to early years providers delivering the government's free childcare entitlements, including the universal and extended offers. It calculates and issues payments to providers in line with national funding rules and local funding rates.

Page 220

Does Disaggregation by default apply to this service? Yes

Why?

There are no significant barriers to disaggregating the function. Five of six complexity drivers are rated Green, reflecting a straightforward, countywide function delivered by a small in-house finance team using standard funding processes. While legislative requirements are rated Amber, requiring each new authority to establish separate governance and funding arrangements, these are implementation considerations rather than barriers to disaggregation.

5.1.4 Early Years Funding (Finance)

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is primarily driven by legislative and governance requirements. Under the Schools and Early Years Finance (England) Regulations, each new authority would need its own DSG allocation, its own local funding formula and its own Schools Funding Forum, which introduces governance and compliance obligations that must be replicated rather than shared. Kent currently operates a single Schools Funding Forum comprising 35 representatives from across the county (excluding Medway), and it is unclear whether existing membership could be distributed across successor Forums or whether additional school leaders would need to be recruited, with separate officer capacity also required to establish and administer each new Forum. Internal operational interdependencies with MIU (data validation) and TEP (provider engagement) also add implementation complexity, with these operating arrangements needing to be reconfigured within new unitary structures. All other drivers indicate the service itself is straightforward to split.
What are the potential risks of disaggregation that need to be considered? The assessment identifies increased costs, reduced efficiency and a requirement for additional staffing (the current team operates with just 2 FTE) as the main consequences of disaggregation, reflecting the loss of scale from operating as a single countywide finance function. The replication of statutory governance structures - particularly separate Schools Funding Forums for each new authority - is highlighted as a further consequence, requiring more school leader involvement and additional officer capacity to service multiple Forums. The assessment also flags a potential loss of consistency across Kent in school funding and policy if successor authorities adopt diverging approaches.

Interdependencies
• Management Information Unit (MIU) validates provider data before it is passed to Finance for payment. • The Education People (TEP) deliver early years activity and provider engagement. • Statutory DfE framework governs DSG administration. • Government intends to transition to a 'hard' National Funding Formula.
Next Steps/ Actions
Now Establish transitional governance arrangements for new Schools Funding Forums and map MIU-TEP-Finance flows. Next Confirm Year 1 DSG allocations, Forum membership and officer capacity for each new authority. Future Assess implications of moving to a 'hard' national funding formula.

Scope:
The Facilities Management to Schools service ensures school buildings across Kent are safe, compliant and fit for purpose. It focuses on landlord-funded statutory inspections (gas, asbestos, legionella, fixed electrical), health and safety compliance, and management of outsourced Hard FM, Soft FM and PFI contracts. KCC acts as statutory Duty Holder for school premises.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. The function is primarily focused on contract management, compliance monitoring, and oversight of outsourced providers, rather than direct service delivery. The principal challenges relate to transition arrangements, notably the management of long-term contractual commitments, including PFI agreements extending beyond Vesting Day 2028, and the need to replicate specialist capabilities and expertise.

5.1.5 Facilities Management to Schools

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? The service is rated Amber across all complexity drivers. The delivery model is highly centralised, relying on countywide outsourced contracts and specialist contract management, compliance assurance and PFI expertise operating at county scale, which would be difficult to replicate across smaller authorities without increased overhead or contract fragmentation. Budget arrangements are pooled and interdependent between schools, Corporate Landlord functions and Education for PFI, meaning disaggregation could require complex budget separation and reapportionment. Staffing depends on specialist, professionally qualified roles underpinning statutory compliance, with recruitment challenges explicitly acknowledged. Long-term contractual arrangements extend well beyond the expected Vesting Day of April 2028. The statutory Duty Holder obligations under health and safety legislation must be fully discharged by any successor authority.
What are the potential risks of disaggregation that need to be considered? Disaggregating the contracts could increase the cost of services and management overheads. Contract clauses reference KCC policies (for example asbestos policy) that would require amendment once KCC ceases to exist, with any changes to process or frequency borne at the successor authority's cost. Because premises are not evenly distributed geographically, disaggregation could raise costs in some areas and remove the economies of scale KCC currently uses to drive prices down. Service consistency is a further consequence, as all Kent schools currently receive the same contractually defined service, which could diverge under different successor authorities. Continuity of the statutory Duty Holder role, and the overriding priority of keeping children, staff and site users safe, must be maintained throughout any transition. PFI contracts, which are between KCC, the PFI providers and the DfE, would require legal review to determine how they novate to a new entity.

Interdependencies
- Schools and Corporate Landlord budgets interconnected; PFI recharged to Education - Small central contract management and PFI oversight team - Outsourced providers: Skanska (Hard FM), waste, catering - PFI companies and DfE; contractor CAFM system
Next Steps/ Actions
Now Undertake contractual due diligence on novation, termination and assignment provisions. Next Determine PFI novation route and separation of pooled schools and Education budgets. Future Preserve Duty Holder accountability, specialist capability and economies of scale across successors.



Scope:
KCC's Financial Assessment and Income service delivers statutory functions for the financial aspects of Adult Social Care. It undertakes means-tested assessments to determine care contributions, provides charging and welfare benefits advice, manages Kentcare invoicing, income collection and recovery, and supports residents through DWP appointeeship or Court of Protection deputyship.

Does Disaggregation by default apply to this service? Yes

Why?

There is no reason the service is unsuitable for disaggregation by default. Legislation prescribes no geographic model, and the statutory framework can be delivered through alternative arrangements provided consistency, specialist capacity and safeguarding are maintained. All six drivers are Amber, reflecting integration rather than a barrier-specialist workforce, corporate systems, uneven demand and statutory duties- need management.

5.1.6 Finance Operations - ASC Finance Assessment

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in the specialised and legally governed nature of the work rather than in transactional volume. Financial Assessment and Benefits, Income Recovery and Financial Affairs each rely on staff with detailed knowledge of charging legislation, statutory guidance and, in some cases, specific legal qualifications, with up to two years required to train financial assessment staff to the required standard. Demand for Income Recovery and Financial Affairs is unevenly distributed across the county, with material concentrations in Thanet & South Kent Coastal and West Kent. Delivery is underpinned by an integrated set of corporate and specialist systems including Mosaic, Oracle Cloud, Dynamics 365, Luware, ServiceNow and Caspar Cloud many of which are held corporately and configured for countywide use. Statutory and safeguarding duties under the Care Act 2014 and Mental Capacity Act 2005 apply throughout, requiring consistent application of complex rules and legally authorised decision-making across cases.

What are the potential risks of disaggregation that need to be considered?

The principal consequences relate to the loss of scale, consistency and specialist resilience that a single countywide functional model currently provides. Fragmentation of specialist teams and case ownership across financial assessment, income recovery and financial affairs could reduce resilience and consistency, particularly for legally or procedurally complex casework. Smaller delivery units may struggle to sustain niche specialist functions, recruit and retain experienced staff, and absorb demand peaks such as the four-weekly Kentcare billing cycle. Duplication of systems, management capacity, training and governance is identified as a further consequence, alongside an increased risk of variation in the application of charging rules, recovery approaches and customer handling without strong shared governance. The assessment also notes offsetting opportunities, including closer alignment with district council Revenues and Benefits functions and the potential to retain specialist capacity through shared service arrangements.

Interdependencies

- Adult Social Care teams generate assessment, charging and billing demand
- Legal Services for recovery, deferred payments, Court of Protection
- Corporate finance systems, Procurement, customer care functions
- DWP, Court of Protection, Land Registry, Office of Public Guardian

Next Steps/ Actions

Now

Review imminent procurements and contract renewals that could constrain future options.

Next

Map specialist roles, system access and income recovery debt across geographic areas.

Future

Sustain specialist consistency, exploring alignment with district Revenues and Benefits functions.

Scope:
Kent County Council's Exchequer service is a core finance operations function responsible for effective processing of financial transactions. It delivers accounts payable, sundry debt invoicing, supplier and customer master data management, and administration of the corporate purchase system, processing 780,569 invoices worth £3.3bn during 2025 through a countywide in-house model.

Does Disaggregation by default apply to this service? Yes
Why?

No reason or evidence that disaggregation by default does not apply. Although the service relies on integrated procurement-to-payment processes, specialist skills, multiple systems and a strong control environment, these are design considerations rather than barriers. Design must preserve end-to-end processes, compliance, system dependencies and resilience; high-volume transactional activity is lower risk to disaggregate than specialist functions.

5.1.7 Finance: Finance operations - Exchequer

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (G)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?
Complexity is driven primarily by the delivery model, staffing profile, systems landscape and compliance requirements. Exchequer operates through integrated procurement-to-payment processes, central financial controls, audit-related activities and shared corporate systems. Specialist knowledge is concentrated in a small number of experienced staff with expertise in Oracle Cloud administration, compliance, fraud prevention, payment control design and high-risk case handling. Delivery depends on multiple financial, banking, fraud analytics and CRM platforms, some of which may require additional licences if services are separated. Decisions on finance systems to be used in the future will shape future design of this service. Legislative and audit requirements require consistent financial controls, documentation and compliance regardless of future organisational structure.

What are the potential risks of disaggregation that need to be considered?
The principal risks identified are loss of consistent financial controls, increased complexity in managing payments and VAT compliance, reduced resilience during demand peaks, fragmented handling of complaints and escalations, and weaker end-to-end procurement-to-payment controls. These consequences are most relevant where integrated processes, specialist expertise and governance arrangements are disrupted. Specialist functions may benefit from mutual support arrangements or phased disaggregation across the new unitaries initially. Transition decisions will need to preserve compliance, control effectiveness and operational continuity. There are also opportunities - disaggregation could improve local responsiveness for lower-risk transactional activity, provide clearer service-level ownership of income and expenditure, and enable closer alignment between service delivery and financial administration.

Interdependencies

- Procurement-to-payment workflows across procurement and finance functions
- ICT, Internal Audit and directorates for systems, governance
- Shared finance, payment, banking and CRM systems
- Supplier and partner relationships; sensitive payment arrangements

Next Steps/ Actions

Now
Factor in Oracle transformation implications in service design and map specialist workforce and critical knowledge.

Next
Review system licensing and contract impacts and identify procurement-to-payment dependencies.

Future
Sustain financial control and compliance and design resilient procurement-finance integration.

Scope:
KCC's Finance function for Schools and High Needs Funding administers the Dedicated Schools Grant Schools and High Needs blocks, calculating payments in line with national funding rules and local funding rates. It serves all schools across Kent, ensuring payments are timely, accurate and compliant with DfE requirements.

Does Disaggregation by default apply to this service? Yes

Why?
There are no significant barriers to disaggregating the function. Five of six complexity drivers are rated Green, reflecting a straightforward, countywide function delivered by a small in-house finance team using standard funding processes. While legislative requirements are rated Amber, requiring each new authority to establish separate governance and funding arrangements, these are implementation considerations rather than barriers to disaggregation.

5.1.8 Schools and High Needs Funding (Finance)

Complexity Driver RAG Assessment					
Demand (G)	●	Delivery Model (G)	●	Staffing (G)	●
Budget (G)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? The main source of complexity arises from the legislative requirement for each new authority to have its own separate DSG allocation, local funding formula and Schools Funding Forum, which is a statutory decision-making body currently operating on a Kent-wide basis(excluding Medway) with 35 representatives. It is not yet clear whether existing representatives could be split across new forums or whether further school leaders would need to be recruited, and additional officer time would likely be required to manage multiple forums. There is currently consistency across Kent in school funding and policy, and multiple forums and formulae could introduce variation for schools and pupils across different unitaries. Beyond legislative governance, no complexity is identified in demand, delivery model, staffing, budget or assets and systems.
What are the potential risks of disaggregation that need to be considered? The assessment identifies the main risks as increased costs, additional staffing requirements, loss of consistency across Kent, and replication of governance structures such as Schools Funding Forums. The replication of statutory Schools Funding Forums for each new authority is a specific consequence, carrying both cost and governance implications and requiring additional officer capacity to support multiple forums. Loss of consistency in school funding and policy across the county is also identified as a potential consequence for schools and pupils. The assessment also notes uncertainty around how the transition to a "hard" National Funding Formula will interact with disaggregated local arrangements.

Interdependencies
• All maintained schools for DSG funding and payments. • Statutory Kent-wide Schools Funding Forum, which will need to be reconstituted for each new authority. • The Education People (TEP) for budget queries and training. • DfE-set DSG framework governing funding rules. Government plans to transition to a 'hard' National Funding Formula.
Next Steps/ Actions
Now Assess officer capacity and establish transitional governance for new Schools Funding Forums pre-Vesting Day. Next Confirm Year 1 DSG allocations, Forum membership and officer capacity for each new authority. Future Assess implications of moving to a 'hard' national funding formula.

Scope:
Home to School Transport Appeals is a subcommittee of KCC's Regulations Committee, providing an independent, fair route for parents and carers to challenge home to school transport decisions, operating under the Local Government Act 1972, DfE statutory guidance and KCC's Home to School Transport Policy. The service is managed in-house by Democratic Services and delivered countywide, with hearings held centrally at Sessions House in Maidstone.

Does Disaggregation by default apply to this service? Yes
Why?

The Appeals function should be disaggregated to ensure alignment with each successor authority's own transport service, policies and eligibility criteria, ensuring consistency between transport decisions and appeal outcomes; retaining a countywide model across multiple authorities with differing policies risks inconsistency. However, the small, experienced team and Member-led panels mean successful disaggregation requires substantial workforce capacity building and panel training.

5.1.9 Home to School Transport Appeals

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is driven by the staffing and delivery model. The service is delivered by a very small team of 3 FTE, meaning there is insufficient scale to support standalone teams without significant recruitment. Specialist clerking expertise is critical to lawful conduct of hearings and would be difficult to replicate quickly across multiple successor authorities. The Member-led panel model adds a further layer of complexity, requiring political proportionality, trained elected Members, and sufficient panel capacity, all of which are vulnerable to loss following election cycles. Budget visibility is also limited because the service is funded from the wider Democratic Services envelope with no discrete allocation, and the legislative framework requires each successor authority to maintain some form of appeals mechanism with an early decision on Member-led versus officer-led panels required.

What are the potential risks of disaggregation that need to be considered?

Disaggregation is expected to exacerbate existing panel capacity and Member availability challenges. Following shadow unitary elections, a newly elected Member cohort would need to be trained afresh for panel duties, temporarily reducing panel capacity and continuity until training is complete. To ensure the service is fully operational by vesting day, successor authorities will need to undertake significant transition activity. This includes recruiting and training additional staff to establish standalone appeals functions, with emphasis on securing sufficient clerking capacity to support legally compliant decision-making and panel administration. Authorities will also need to determine their preferred appeals panel model and implement associated governance and training requirements. Whether panels are Member-led or officer-led, those determining appeals will require a strong understanding of local Home to School Transport policies, eligibility criteria, and statutory requirements to ensure consistent, robust decision-making. In parallel, each authority will need to establish independent appeals processes, systems, documentation, and administrative arrangements to ensure service readiness from vesting day and support effective management of any transitional caseload.

Interdependencies

- The same team also administers school appeals and school exclusion appeals, so disaggregation must be considered across all three functions collectively.
- CYPE HTST provides initial eligibility decisions, evidence and costings.
- SEN Team supports EHCP-related appeal cases.
- Local Government Ombudsman interaction required when complaints arise, though this is rare.

Next Steps/ Actions

Now

Recruit clerks and enable knowledge transfer from the existing countywide team.

Next

Confirm Member-led or officer-led panel model and design local case management processes.

Future

Establish independent appeals functions aligned to each authority's transport policies and eligibility criteria.



Scope:
The Kent & Medway Safeguarding Adults Board is a statutory multi-agency partnership coordinating adult safeguarding across Kent and Medway under Section 43 of the Care Act 2014. It protects adults at risk of abuse or neglect through system-wide assurance rather than frontline delivery, and commissions Safeguarding Adults Reviews.

Does Disaggregation by default apply to this service? No

Why?

The Kent and Medway Safeguarding Adults Board should remain a combined countywide arrangement because its Care Act duties require continuous system-wide assurance, supported by a single Business Unit, pooled partner funding and commissioned SAR capacity. Retention best protects statutory compliance, resilience and partnership coherence.

5.1.10 Kent & Medway Safeguarding Adults Board (KMSAB)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (R)	●
Budget (R)	●	Assets/ Systems (G)	●	Legislative (R)	●

Complexity Overview

What makes this service complex to disaggregate?

Complexity is concentrated in the Red-rated Delivery Model, Staffing, Budget and Legislative drivers, which together shape a system-critical safeguarding assurance function that is not readily separable. Delivery operates as a statutory multi-agency partnership supported by a single centralised Business Unit, with independent chairing and Safeguarding Adults Reviews commissioned externally and embedded in partnership governance. Staffing complexity reflects a small, team of 5.6 FTE and reliance on a commissioned pool of Independent SAR Chairs and authors, where national shortages and the need for established relationships make replication at smaller scale more difficult. Budget complexity arises from pooled countywide funding drawn from Medway Council, health partners, the Office of the Police and Crime Commissioner, Kent Fire and Rescue Service and District Councils, with the 2026/27 District Council contribution still to be confirmed. Legislative complexity reflects continuous, non-delegable statutory duties under the Care Act 2014 that are time-critical and sensitive to disruption, further amplified by an active national reform agenda affecting safeguarding partners.

What are the potential risks of disaggregation that need to be considered?

The principal risk identified in the assessment is maintaining effective safeguarding assurance and oversight. The Board provides a critical statutory function, bringing together partners to identify risks, challenge practice, coordinate learning and oversee safeguarding performance across the system. Disaggregation could create additional complexity in maintaining this oversight and ensuring safeguarding intelligence, learning and assurance continue to operate effectively across organisational boundaries. Capacity, resilience and business continuity may also be more challenging in smaller arrangements, particularly given the reliance on a small central Business Unit and nationally scarce Independent SAR Chairs and authors. Partner agencies operating across Kent and Medway, including Police, Health and Probation, could face increased demands if required to engage with multiple safeguarding arrangements. Given the assessment's recommended candidate pathway of a continued countywide arrangement, the practical consequence of disaggregation would be the loss of the integrated safeguarding assurance mechanism that currently supports statutory continuity and system-wide oversight.

Interdependencies

- KCC, Medway Council, Kent and Medway ICB and Kent Police as statutory partners
- Central KMSAB Business Unit (5.6 FTE) and peer support
- NHS providers, probation and wider safeguarding partners
- Commissioned Independent SAR Chairs; pooled partner funding

Next Steps/ Actions

Now

Confirm continued countywide Safeguarding Adults Board arrangement and Day 1 governance.

Next

Map statutory continuity requirements and commissioning route for Independent SAR Chairs.

Future

Sustain independent scrutiny, SAR capacity and multi-agency governance at any scale.

Scope:
Kent Safeguarding Children Multi-Agency Partnership (KSCMP) coordinates statutory multi-agency arrangements to safeguard and promote the welfare of children across the Kent local authority area, delivering partnership leadership, learning, Section 11 audits, Local Child Safeguarding Practice Reviews and independent scrutiny.

Does Disaggregation by default apply to this service? Part 257 Why?

KSCMP's core statutory safeguarding coordination and governance should remain countywide because partner engagement, pooled funding and consistent scrutiny are central to effectiveness. Fragmentation would increase oversight complexity and weaken coherence. A continued countywide arrangement, potentially transitional with Medway, is the strongest recommendation.

5.1.11 Kent Safeguarding Children Multi-agency Partnership (KSCMP)

Complexity Driver RAG Assessment					
Demand (G)			Delivery Model (A)		
Staffing (A)			Budget (A)		
Assets/ Systems (G)			Legislative (R)		

Complexity Overview

What makes this service complex to disaggregate?

Complexity is driven primarily by the Red-rated legislative basis and the Amber-rated delivery model, budget and staffing. Statutory safeguarding duties must operate at local authority area level, with shared legal duties across the local authority, police and health, meaning fragmentation would require partners to engage across multiple governance structures and could reduce coherence. The delivery model relies on a centralised Business Team supporting audits, learning, reviews and statutory processes with no area-based footprint, and Working Together 2026 has extended partnership responsibilities to operational effectiveness, with unclear implications for future resourcing of a small team. Financial interdependence is significant, with approximately 94% of funding pooled from the three statutory partners and the remainder from relevant agencies, managed on a countywide basis. The staffing profile is small and mainly consists of specialist safeguarding, partnership and data analysis roles that the assessment describes as feasible but potentially challenging to recruit to.

What are the potential risks of disaggregation that need to be considered?

The assessment identifies loss of economies of scale, potential divergence in safeguarding practice if multiple partnerships are established, and the risk of partner disengagement if statutory partners are required to operate across multiple unitary arrangements. Increased political and governmental oversight is noted, alongside sensitivity to changes in government direction testing the current operating model and resource capacity. Fragmenting independent scrutiny arrangements is flagged as a legal and accountability consideration, and pooled partner funding means that any governance change would carry financial consequences for the partners as well as the council. The recommended countywide pathway is intended to preserve statutory compliance, partner coherence and continuity of independent scrutiny; a divergent pathway would carry the corresponding reverse consequences.

Interdependencies

- Children's Social Care; Lead Safeguarding Partners (DCS, Chief Executive)
- Education, Public Health via Section 11 audits
- Kent Police and Kent and Medway ICB statutory duties
- Contracted Independent Scrutineer; joint working with Medway

Next Steps/ Actions

Now

Confirm continued countywide arrangement for coordination, scrutiny and partnership leadership functions.

Next

Establish Medway's position on aggregation and clarify Working Together 2026 resourcing implications.

Future

Preserve economies of scale, consistent practice and independent scrutiny without disruption.

Scope:
Customer Service Delivery provides Kent County Council's main resident access and assurance functions through the Contact Centre, Customer Feedback Service and Gateway network, supporting telephone, digital and face-to-face access to council services. Demand is high-volume and countywide, with approximately 510,000 contacts per annum handled through the Contact Centre, alongside 15,500 annual Customer Feedback cases and locally distributed Gateway footfall at six locations. The services also manages statutory complaints and Ombudsman requirements.

Does Disaggregation by default apply to this service? Yes

Why?

No statutory or structural barrier to disaggregation. Demand is population-aligned, legislation does not prevent separation, and parts — particularly Gateway provision — have place-based characteristics. However, front-door responsibilities, statutory complaints handling and 24/7 access create transition complexity. Complexity is driven by the operating model, contracts, systems and integration, so disaggregation is a viable end state.

5.1.12 MRX: Customer Service Delivery

Covering: Customer Feedback, Gateways and Intelligent Client (Contact Centre)

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?

The principal complexity arises from the service's role as the corporate front door for most council services and its reliance on an integrated operating model. The Contact Centre is delivered through a large outsourced contract operating at countywide scale, while Customer Feedback provides specialist statutory functions requiring consistent governance, escalation and complaints handling. Gateway services involve multiple partnerships, tenancy arrangements and physical locations. The service also depends on tightly integrated systems, large volumes of customer and case data, and continuous 24/7 provision for emergency and safeguarding-related contacts. These factors do not prevent disaggregation but increase the amount of redesign, coordination and transition planning required.

What are the potential risks of disaggregation that need to be considered?

While there are no statutory or structural barriers to disaggregation, the service operates through a number of highly integrated functions that could create practical risks if separated immediately. Key risks include disruption to the corporate front door and 24/7 emergency response and safeguarding arrangements, challenges arising from a scale-dependent contact centre contract, and potential impacts on statutory complaints handling, where specialist expertise and consistent governance are required. In addition, shared systems, contracts and large datasets would require complex migration and reconfiguration, creating risks to service continuity, compliance and performance. A phased approach to disaggregation may therefore be required to ensure continuity.

Interdependencies

- Corporate front door to most KCC services; complaints handling
- Shared systems, information governance; Property for Gateway buildings
- Contact Centre contract (Capita); ICasework contract (Civica)
- NHS, Police, Medway, districts and Gateway partners

Next Steps/ Actions

Now

Assess Contact Centre contract flexibility, novation and sequencing requirements.

Next

Plan system separation and map workforce implications for specialist complaints roles.

Future

Maintain complaints, safeguarding and 24/7 access, and define long-term Gateway model.

Scope:
The service administers Independent Review Panels for challenges to permanent school exclusions, ensuring compliance with statutory DfE guidance. It arranges hearings, manages documentation and provides procedural support to enable lawful, impartial panel decisions across Kent schools, with commissioned provision for some Medway and London schools.

Does Disaggregation by default apply to this service? Yes

Why?
The service should be disaggregated to ensure alignment with existing education and attendance functions that will transfer to successor authorities. Local delivery would support service coherence, responsiveness, and compliance with guidance favouring in-person hearings within the school locality. However, successful implementation will require careful transition planning, particularly around workforce, clerking, recruitment and training. Given the low and variable volume of appeals, integration with wider appeals services (school appeals, home to school transport appeals) would provide greater efficiency and resilience.

5.1.13 Permanent School Exclusion Appeals

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
The service is delivered by only 3 FTE plus one part-time member of staff, which is too small to sustain multiple standalone teams across successor authorities without significant recruitment. Panel composition is strictly prescribed, comprising a Lay Chair, a Governor Member, and a serving or recently serving Headteacher. Panel members are required to undertake training delivered by an external barrister every two years, with recognised challenges in recruiting, training, and maintaining a sufficiently sized pool of suitably qualified panel members. Demand adds a further constraint: volumes are low and variable (rarely more than ten hearings per year across the whole county) and are geographically dispersed rather than clustered, creating scale sensitivity for any disaggregated model. The delivery model combines central coordination with locally delivered hearings and depends on volunteer panel members and externally sourced clerks during peaks, indicating reliance on pooled capacity that is not fully within organisational control. Budget complexity reflects the absence of a discrete staffing budget, with costs embedded in the wider Democratic Services envelope, which limits assessment of any financial implications.

What are the potential risks of disaggregation that need to be considered?
Disaggregation is expected to exacerbate existing panel capacity and recruitment challenges, given the strict eligibility criteria and limited pool of qualified members. Spreading a very small workforce across multiple new authorities risks a loss of clerking expertise and institutional knowledge, critical to lawful conduct of hearings. Annual demand is insufficient to sustain multiple dedicated teams, meaning stand-alone exclusion appeals functions may not be proportionate or efficient. To enable effective disaggregation, successor authorities will need to undertake workforce development, service design, and governance preparation during transition. Additional staffing capacity, particularly for clerking, will be required to ensure statutory compliance and lawful decision-making. Authorities will also need to recruit and maintain a sufficient pool of qualified and independent panel members, supported by training, clear governance, and strong stakeholder engagement to ensure hearings can be conducted effectively and impartially from vesting day.

Interdependencies

- The same team also administers school appeals and home-to-school transport appeals, so disaggregation must be considered across all three functions collectively.
- The service works with the Coordinated Admissions Team and KPAS on exclusions.
- Schools supply documentation and often host in-person hearings.
- SLAs with academies, free schools & out-of-area schools.
- Service relies on volunteer panel members.

Next Steps/ Actions

Now
Recruit experienced clerking capacity and begin proactive panel member recruitment through local schools.

Next
Establish training programmes and clarify SLA arrangements with academies, Medway and London.

Future
Integrate exclusion appeals with school and transport appeals for proportionate, resilient delivery.

Scope:
Kent County Council's Financial Hardship Programme is a grant-funded initiative supporting residents experiencing, or at risk of, financial hardship. It coordinates crisis support and interventions, including financial assistance, debt and income advice, and access to local and national schemes, transitioning to the Crisis and Resilience Fund from April 2026.

Page 200

Does Disaggregation by default apply to this service? Yes

Why?

No statutory or structural barriers to disaggregation; the service aligns with the default position. Frontline and housing-related delivery already operates at district level and gains from greater local visibility, ownership and flexibility. Transition complexity comes from the current countywide arrangements for governance, assurance, reporting, funding, the specialist workforce and shared systems.

5.1.14 Portfolio Management - Financial Hardship Programme

Complexity Driver RAG Assessment		
Demand (A)	●	Delivery Model (A) ● Staffing (A) ●
Budget (A)	●	Assets/ Systems (A) ● Legislative (G) ●

Complexity Overview

What makes this service complex to disaggregate?

The service has no structural barriers to disaggregation, but several factors increase the complexity. These include a countywide delivery model, centrally accountable grant funding with strict compliance requirements, a small specialist workforce, shared systems and data architecture, and strong interdependencies with district councils, NHS, Public Health and VCSE partners. Governance, funding, systems and workforce arrangements are closely aligned and rely on scale, consistency and central oversight. Shared systems, including ReferKent, Digital Kent and a new digital crisis-support solution mean separation needs planned licences and data-sharing agreements. While frontline and housing-related services are less complex to disaggregate, key functions such as specialist capability, systems and shared platforms may require transitional countywide arrangements initially, with longer-term decisions dependent on unitary service design and appetite for coordinated programme management.

What are the potential risks of disaggregation that need to be considered?

These are complexity challenges to manage during transition, not fundamental blockers. Disaggregation risks variation in eligibility and customer experience, which could be mitigated by common eligibility criteria, decision frameworks and reporting definitions across successor organisations. Replicating programme management, assurance, reporting and procurement adds coordination effort and resource. Dividing the small specialist team risks diluting capability and resilience. Statutory elements such as Healthy Start must be assigned from day one. Set against this, disaggregation could enable greater local visibility, ownership and flexibility.

Interdependencies

- KCC services: Public Health, CYPE, libraries, Digital Kent
- Central Commercial, Procurement, Counter Fraud, Information Governance, Democratic Services, Legal and Finance functions,
- All 12 district and borough councils deliver locally
- NHS, Public Health for Healthy Start; VCSE, colleges

Next Steps/ Actions

Now

Map interdependencies across all district and borough councils.

Next

Design the digital crisis-support solution for separation and manage specialist staff requirements.

Future

Maintain consistent eligibility decisions, workforce resilience and statutory continuity for Healthy Start.

Scope:
KCC's Refugee Resettlement Programme delivers government-funded refugee resettlement schemes across the county, coordinating arrivals and integration support for vulnerable refugees. It covers pre-arrival planning, housing, safeguarding and three-to-five-year casework support and currently coordinates seven Home Office schemes including Afghan resettlement and the UK Resettlement Scheme.

Does Disaggregation by default apply to this service? Yes

Why?

No specific, material reason prevents disaggregation as currently operated: participation is voluntary, funding is fully grant-based and net nil to KCC, staffing is small and broadly replicable, and no legislative or specialist asset barriers exist. The recommendation is qualified by viability questions — pooling across ten districts sustains low, uneven arrival volumes.

5.1.15 Portfolio Management - Refugee Resettlement Programme

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (R)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview

What makes this service complex to disaggregate?

The delivery model is the principal complexity: the service depends on extensive interdependencies with KCC functions (schools, adult and children's social care, safeguarding, education access and transport, adult education, financial hardship, resilience) and external partners including the Home Office, MHCLG, MoD, NHS, Kent Police, Counter Terror Policing, Kent Fire & Rescue and the South East Strategic Partnership for Migration. Demand is unevenly spread across the ten coordinated districts, with volumes ranging from 118 open cases in Folkestone & Hythe to zero in Tonbridge & Malling, making pooling of resources central to viability. Budget is entirely grant-funded and ring-fenced by Home Office Funding Instructions, with financial sustainability tied to maintaining sufficient volumes within the funding envelope. Staffing is small at 8 FTE, with dedicated roles for specific functions that do not naturally split across smaller footprints. Assets/Systems (Amber) include a bespoke Power Platform Case Management System and mandated Home Office and MHCLG platforms (MOVEit DMZ, DELTA) required for compliance. Legislative complexity reflects discretionary participation, but statutory duties are triggered once individuals arrive.

What are the potential risks of disaggregation that need to be considered?

Funding viability is the principal risk: pooling across ten districts is described as cost-effective because arrival numbers are relatively low, and smaller delivery footprints may not remain viable within the Home Office funding envelope. It also flags a risk of non-compliance if datasets and reporting to the Home Office are not maintained securely through transition. Continuity of service delivery for vulnerable families is highlighted as a risk, alongside the potential loss of key staff with experience and specialist knowledge during restructuring. Disaggregation would likely increase cost and complexity for partners working across multiple unitaries and could raise demand and cost pressures on statutory services if reimbursement through the grant becomes less efficient at smaller scale. Contracts run to 31 May 2028 (with a possible extension on the main integration support contract), meaning transition sequencing will directly affect commissioning.

Interdependencies

- District housing authorities (ten coordinated); housing most significant
- Children's and adults' safeguarding and education teams
- Home Office, MHCLG, MoD, SESPM; Police, NHS
- Commissioned integration and furnishings providers; Home Office/MHCLG platforms

Next Steps/ Actions

Now

Map contract positions to 31 May 2028, including novation or extension options.

Next

Plan secure data migration and confirm workforce arrangements across the 8 FTE.

Future

Sustain financial viability and explore integration with future service design across unitary structures including housing.

Scope:
The Ukraine Refugee Response Programme delivers the Government's Homes for Ukraine sponsorship and resettlement scheme locally, supporting Ukrainian nationals displaced by conflict. As the upper-tier authority, KCC manages grant funding, statutory safeguarding and accommodation checks, and wraparound integration support, including housing rematching, mental health support, ESOL and employment pathways.

Does Disaggregation by default apply to this service? Yes

Why?

No specific barrier prevents disaggregation. Grant funding follows the guest, making income and expenditure separable at district level, and the programme-specific skillsets are considered replicable. Delivery is already partially distributed - four districts run their own wraparound support, eight rely on KCC coordination. Viability questions remain: centralised coordination gives critical mass and cost efficiency.

5.1.16 Portfolio Management - Ukraine Refugee Response Programme

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
Demand is unpredictable and geographically uneven because sponsorship matches are determined externally by the Home Office. The current delivery model provides centralised financial control and statutory reporting and wraparound support in most districts, which evidence suggests has been the most efficient and effective way to manage resource and demand. The service depends on a small team covering safeguarding, reporting and grant compliance functions that would need replication in each successor body, as would interdependencies with Children's Services, Adult Social Care, District Housing and Finance. Current system interdependencies are Liberi, Mosaic, HR Connect and multiple national systems. None of these factors individually prevent disaggregation, but together they create material implementation considerations.

What are the potential risks of disaggregation that need to be considered?
Inefficient staffing models, reduced oversight, reduced resilience and specialist capacity, and data quality and reporting risks. Less efficient use of grant funding could prevent full reimbursement of costs to statutory council services, particularly as evidence suggests district-led delivery has been more expensive than the current centralised model. There is also a resilience consequence, given that commissioned providers previously could not scale to peak demand and the current in-house model was adopted specifically to enable a flexible response. Set against this, there are also opportunities in improved local responsiveness and stronger local integration.

Interdependencies

- District Housing teams (accommodation, property checks, homelessness prevention)
- District Finance and KCC Finance (s151) for grant compliance
- Children's Services and Adult Social Care for statutory safeguarding
- Home Office and MHCLG for matches, tariffs, reporting

Next Steps/ Actions

Now
Map dependencies with housing, finance and social care services.

Next
Confirm whether unitaries want a shared response and plan data migration.

Future
Sustain wraparound continuity, safeguarding accountability and resilience across delivery bodies.

Scope:
Kent County Council's Resilience and Emergency Planning Service ensures the council can prepare for, respond to and recover from incidents affecting Kent and Medway. It delivers statutory duties under the Civil Contingencies Act 2004 — risk assessment, planning, training, exercising and learning — and oversees business continuity across KCC services.

Does Disaggregation by default apply to this service? Yes

Why?
No strong reason prevents disaggregation. Civil Contingencies Act duties require local-authority capability, not a single countywide structure and delivery relies on partnerships, coordination, and shared or replicable systems. Transitional arrangements suit multi-agency coordination, Kent Resilience Team hosting and command capability.

Under devolution policy, function(s) performed by this service will be part of the powers and responsibilities that would sit under a Strategic Authority for Kent and Medway, should one be established in the future. This will need to be considered in future service design.

5.1.17 Resilience & Emergency Planning

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (A)	●
Budget (A)	●	Assets/ Systems (A)	●	Legislative (A)	●

Complexity Overview
What makes this service complex to disaggregate? Complexity is concentrated in a small specialist workforce and a dense multi-agency operating model rather than in transactional volume. Delivery is provided by 14 FTE, the majority of which hold Level 4, Level 5 or professional qualifications in resilience and emergency planning. Statutory duties span the Civil Contingencies Act 2004, COMAH 2015, REPIR 2019, the Pipelines Safety Regulations 1996 and the Reservoirs Act 1975, with high-risk sites distributed across the county. Delivery depends on structured partnerships – Kent and Medway Resilience Forum (KMRF), Local Authority Resilience Agreement, the Kent Resilience Team (3 KCC-funded FTE), Category 1 and 2 responders and central government - and on shared systems including Resilience Direct, Airwave and JCAD. Demand is volatile: baseline planning follows programmed cycles, but incident response redirects staff at short notice, with typical major incidents running around two weeks and 5–10 command meetings per day. Boroughs and districts currently resource emergency planning at very low levels. What are the potential risks of disaggregation that need to be considered? The Assessment identifies inconsistency of approach across successor authorities as a key consequence, with knock-on effects on mutual aid and partnership working. Dilution of specialist experience across smaller units, continued under-resourcing of emergency planning in boroughs and districts, and inability to meet statutory duties are recorded as material risks by the Service Lead. Ineffective incident response - including potential welfare impacts - is identified as a risk if sufficient leadership and capacity is not replicated in successor bodies. Transition consequences around Vesting Day include unclear leadership arrangements, capability gaps, inconsistent training standards and reduced access to KCC-wide services that are themselves in transition. Potential mitigations include possible development of a Shared Service or Joint Emergency Planning Unit, flexible staffing across multiple unitaries, consistency in planning and training, improved ability to meet statutory duties, establishment of 24/7 Duty Emergency Planning Officer capability and continued support to the Kent Resilience Team and KMRF partnerships.

Interdependencies
- Multi-agency delivery through KMRF, LARA and Kent Resilience Team - Category 1/2 responders: police, fire, SECamb, NHS, Environment Agency - Site operators: Dungeness B, COMAH sites, pipelines, reservoirs - Shared systems and contracts: Resilience Direct, Airwave, mortuary provision
Next Steps/ Actions
Now Map specialist capability across successor authorities and assign statutory compliance for high-risk sites. Next Clarify novation of Airwave, Continuity2 and mortuary contracts, and confirm shared-system interoperability. Future Establish a shared or joint emergency planning unit ensuring consistent, sustainably funded resilience.

Scope:
KCC's School Appeals function is a statutory service enabling parents and carers to challenge school admissions decisions under the School Standards and Framework Act 1998 and the School Admission Appeals Code. It administers appeals and convenes independent panels for primary, secondary and in-year cases. The service is delivered countywide on a fully virtual, paperless basis.

Does Disaggregation by default apply to this service? Yes

Why?
No strong reason prevents disaggregation. Admissions functions will likely be administered separately by successor authorities under their own admission schemes, so aligning the appeals service to mirror that structure supports coherence, legal robustness and local accountability; a countywide model spanning multiple admissions policies risks inconsistency. However, successful disaggregation depends on significant transition planning to expand capacity, build in-house clerking expertise and recruit and train panel members.

5.1.18 School Appeals

Complexity Driver RAG Assessment					
Demand (A)	●	Delivery Model (A)	●	Staffing (R)	●
Budget (A)	●	Assets/ Systems (G)	●	Legislative (G)	●

Complexity Overview

What makes this service complex to disaggregate?
The staffing profile is the primary constraint, rated Red. The service is delivered by only 3 FTE supported by a part-time member of staff, meaning there is insufficient scale to support standalone teams without significant recruitment. The Clerk to the Appeal Panel is identified as a specialist role critical to procedural accuracy and lawful conduct, while independent panels rely on trained volunteers whose availability is already an ongoing challenge. Demand (Amber) is uneven, with recurring hotspots in Dartford, Maidstone, Tunbridge Wells, Ashford, Canterbury and Dover linked to grammar school prevalence and constrained by statutory timescales of hearing appeals within 30–40 school days. The delivery model (Amber) combines a fixed core team with variable external clerking to absorb peaks, and the Budget rating (Amber) reflects the absence of a discrete staffing budget alongside income that fluctuates with appeal volume.

What are the potential risks of disaggregation that need to be considered?
There are clear capacity risks related to disaggregation. Splitting an already small team of 3 FTE across successor authorities would reduce service resilience and increase reliance on external clerks, while the shared volunteer panel pool would come under greater pressure as authorities compete for the same limited resource. Uneven geographic demand means some successor authorities would inherit disproportionately high volumes while others would see relatively little, creating imbalance in workload and statutory-deadline pressure. Income dependency on fluctuating appeal volumes creates further financial variability at authority level.

To ensure standalone appeals services are operational from vesting day, successor authorities will need to undertake a significant programme of transition activity focused on workforce expansion, capacity building and service readiness. This will include recruiting additional appeals and administrative staff, developing sufficient in-house clerking capacity to support legally compliant decision-making, and recruiting and training a suitable pool of appeals panel members.

Interdependencies

- The same team also administers school exclusion appeals and home-to-school transport appeals, so disaggregation must be considered across all three functions collectively.
- Coordinated Admissions Team provides admission data, case information and Kent Test information.
- Schools provide documentation; SLAs with academies and Medway Academy Trust schools.
- Service relies on volunteer panel members.

Next Steps/ Actions

Now
Plan and sequence recruitment of appeals officers and clerks before Vesting Day.

Next
Build in-house clerking capability and recruit and train volunteer panel members.

Future
Decide whether virtual hearings remain the default delivery mechanism for successor authorities.