

CONSULTATION FEEDBACK DRAFT RESPONSES

PART 1

Kent Communities Programme Consultation Draft Feedback Responses

Feedback on the needs-based framework	
Looking at the feedback to the consultation set out in the Lake report, the majority of	
Feedback	KCC response
whether KCC's approach to need properly reflects the actual usage of services	Yes - we looked at the numbers of people using our services and this data formed a part of the need analysis when we were considering the proposals. This is detailed on pages 17 and 18 of the consultation document.
whether children's centre usage data has been properly taken into account and whether KCC's approach to need properly reflects the importance of children's centres to users	<p>Yes – we looked at the numbers of people accessing our children's centre services. Additional data sets setting out the need for children's centres includes number of children eligible for free school meals, 0-19 social care referrals and other data sets. These were all included on page 18 of the consultation document.</p> <p>The consultation questionnaire was used to gather feedback and the consultation included proactive engagement sessions with service users. Feedback included the impact people felt the proposals would have on them, thus highlighting the importance. This has been considered when reviewing the proposals following the consultation.</p>
likely future increases in need in particular areas (such as Dartford) as a result of forecast population growth or recent housing growth (such as in Faversham)	Forecast population of 0–5-year-olds in 2040 was included within our data analysis.

whether the pandemic (and reduction in service provision during the pandemic) has affected the reliability of the data	The Need Framework relied on pre-COVID data as there was an acceptance that COVID-era and immediately post-COVID data would not be adequately reliable.
whether KCC should have considered data about access to a car in different areas when devising its needs metrics	As people may not have access to a vehicle, travel times to alternative buildings were estimated using public transport information, not car travel times.
whether KCC has had regard to the option of travelling across district boundaries to access services	Yes. It was recognised in the proposals that the nearest alternative location for some individuals may be across a District boundary – for example page 67 of the consultation document, where Next Steps Children’s Centre (Gravesham) is identified as a nearest alternative to New Ash Green Children’s Centre (Sevenoaks).
whether KCC’s public transport data is out of date (and takes into account any recent or planned service cancellations)	The transport analysis that accompanied and fed into the Need Framework included all known proposed changes to the public transport network at the time of consultation and decision. The transport analysis and the need analysis will be regularly reviewed in coordination to determine future service provision.
whether KCC’s approach to need will have a disproportionate effect on small or rural communities	The proposed model does not consider ‘rurality’ as a specific factor and it is true that there are closures proposed to centres in more rural settings. However, the Need Framework did look at the travel time and catchment area of centres when building the proposed model. Our proposed outreach model does specifically consider how best to serve more rural communities regardless of whether there is a proposed closure in that location, or whether there was no centre in that location to begin with. A co-designed outreach offer will be guided by the Need Framework and not the historical estate context.

Feedback which goes to overall proposals

Concerns about co-location	
Feedback	KCC response
co-location of services for children with other services (e.g. libraries and services for adults with learning disabilities)	Service representatives have been involved in the planning of proposed co-location sites, and feasibility studies undertaken to ensure that any co-location is appropriate for the services included. This will include refurbishment works to make sure spaces can be used appropriately by all relevant services.
the effects of co-location on partners (e.g. nurseries) who currently share children's centre sites	<p>The proposals set out at consultation do not impact partners within co-location sites. Where there are partners within co-location sites, these spaces have been protected in our planning to ensure the widest range of service delivery possible from the location.</p> <p>The proposals set out at consultation do not impact existing occupiers at sites proposed for closure who occupy the property under a formal tenancy agreement, such as a lease. In these cases, the continued occupation will be subject to the terms of the lease and managed within existing estate management policy.</p>
whether co-location will inevitably lead to reduced service provision in some areas (e.g. because of a lack of facilities such as outdoor play areas at some sites)	Service representatives have been involved in the planning of co-location sites to ensure that space within sites is efficiently used and/or shared so that service provision is protected wherever possible. However, there are some instances, for example in terms of outside play space, where it will not be possible to include within all co-location sites and this will have an impact on how services are experienced.
concerns about privacy and confidentiality where buildings are	Privacy has been considered when exploring the suitability of co-locations to protect the confidential nature of some

multi-use	aspects of service delivery. This includes spaces for confidential conversations, as well as for activities such as breastfeeding. These spaces are being included in our early designs for co-location buildings.
the suitability of particular buildings for the co-location of the proposed services	There are 14 buildings which have been proposed for co-location of services. Each of these buildings has been individually assessed for its suitability for co-locating the proposed services. This process has included the input of the services themselves as they best understand the needs of their service users.

Concerns about impacts on people who may no longer be able to (or choose to) access services	
Feedback	KCC response
impacts related to the lack of service provision itself	The Need Framework and the input from the service team results in a proposed model that responds appropriately to the needs of different communities. In some instances, there are areas of high need, where the type of need or the community means that a permanent KCC building may not actually be the best method of service delivery – it may be more effectively for the service to ‘go to them’ in different community settings rather than require service users to come to our building in the first place. The Kent Communities model is designed to provide access to the right services in the right way in the right location. The Need Framework will necessarily need to be reviewed as communities evolve over time and need changes. By working with our partner agencies we would expect to be able to

	continue to adapt our service offer in the future to ensure we are meeting the changing need as best as possible given the financial constraints the Council faces.
broader impacts, such as impacts on mental health. KCC should also consider the impacts on those consultees who have described services as a “lifeline”, and others who may be particularly affected as a result of not accessing the relevant services	The Programme team have considered various factors in developing additional options following feedback from the consultation. The options put forward for member consideration include two models that have been amended to increase access to physical locations based on the ease of access on public transport. This is a helpful metric that has been objectively quantified to influence the development of the other options. Beyond KCC buildings delivering services directly, the outreach model will provide services out in communities depending upon need – it is proposed that this provision is co-designed with partners including District Councils. The universal digital offer will provide signposting and online services where appropriate.

Concerns about broader impacts of longer travel distances beyond difficulties accessing services	
Feedback	KCC response
Financial impacts	We appreciate that some people may face an increased cost in order to access an alternative KCC building. However, we propose an outreach model that seeks to deliver services in the heart of communities where the level and type of need (according to the Need Framework) suggests that outreach would be the most appropriate way of reaching those who need services.

Time	Journey times as well as service regularity across the public transport network have been considered within the options to be presented to members.
Impacts on ability to access work	Once a decision is made on the way forward, any implications will be discussed in detail with staff in line with the Council's standard HR practices. The registered Trade Unions have been briefed throughout the course of the Programme.

Whether KCC has considered using non-KCC buildings for service delivery	
Feedback	KCC response
...in relation to co-location and outreach	The current proposal focuses on the KCC estate and seeks to utilise our buildings to best meet the different levels of need identified through the Need Framework. This model does not preclude us working with other organisations in the future and utilising buildings outside of the KCC estate to deliver services, as long as any future solution continues to respond to the Need Framework. It is acknowledged that a co-designed outreach proposal will likely make use of alternative buildings owned and operated by other organisations dependent on the Need Framework and the co-design with partners.
Consultees have suggested that district councils may have buildings which would be more appropriate for the co-location of services	The One Public Estate (OPE) programme supports locally-led partnerships of public sector bodies to collaborate around their public service delivery strategies and estate needs. As part of the One Public Estate network in Kent, it makes sense to consider

	joint building networks between KCC, District council partners and other agencies such as NHS and Police. The Need Framework allows us to continually review the levels of service need within different communities and collaborate with partners in the future where appropriate and where possible.
KCC should ensure that it considers non-KCC buildings (such as village halls) when deciding where to locate outreach	This forms part of our outreach modelling which we anticipate will be co-designed with other partners.

Concerns about the impact on other KCC and partner services	
Feedback	KCC response
whether increased difficulty accessing certain preventative services (such as early years services) may lead to greater pressure in the future on other services (such as SEN services, social services, or health services)	The Family Hub model is built on the understanding that preventative services are an integral entry point to other service provision delivered by KCC and other agencies. The Family Hub model will provide for much greater integration between KCC services and services from other providers (e.g. NHS) regardless of the delivery method (permanent physical building, outreach session, digital).
the impacts of building closures on partners who currently use the relevant buildings (e.g. comments about the closure of children's centres which are used by KCC social services for meetings with parents and children)	The Implementation period for the programme, subject to decision by Cabinet, would span across a number of years. If there is a decision to make changes, the KCC Property team will work with partners within our buildings to notify them of the changes and the likely timeline for implementation that affects them. Any KCC service provision that is required (such as Family Time) will be delivered in alternative locations – which is currently delivered from

	a range of locations, including some of KCC's office estate.
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Important demographic trends in the responses	
Feedback	KCC response
<p>In particular, women, younger people, and those with children are much more likely to disagree with the proposals (overall, but also with specific aspects of the proposals, such as co-location and the reduction in the number of buildings). KCC should ensure it has thought about why this is the case and whether this means that consultees feel more strongly about particular services (e.g. children's centres) or whether the impact of certain building closures (again, possibly children's centres) may be significant than others. If KCC does think that there is particular opposition to the closure of children's centres, it should explain why it will not reduce the number of closures (including why it will not close more of the other types of buildings instead).</p>	<p>The largest set of changes in the consultation proposals are for children's centres and youth hubs. Young people, women, and people with children are the biggest users of these services. It correlates that these groups have responded more negatively about proposals for building closures than other groups as they will be more impacted by these proposals.</p> <p>This is addressed in detail in the Equality Impact Assessments that accompany the decision papers.</p> <p>The financial challenge faced by the Council means that difficult decisions need to be taken across all areas of Council business in order to make required savings and deliver a balanced budget. Alongside the mitigation factors set out in the EqIA and given the financial and policy context, the impact is considered to be justified.</p>

Concerns about outreach	
Feedback	KCC response

the need to ensure that outreach services are accessible	Accessibility and suitability of buildings will be a key factor in choosing where to deliver outreach services.
concern that outreach provision may be unsuitable for some services (e.g. services accessed on an unplanned or 'as needed' basis)	The proposal will seek agreement from decision-makers for a co-design approach to outreach delivery, drawing on the knowledge and perspectives of partners including district councils, health and community partners.
that the level of detail in the consultation raised concern about whether outreach would be sufficient to meet need	The Need Framework will play a key role in planning where outreach services are needed so that provision is sufficient for those that need it.
concern that outreach venues do not have the right facilities	Outreach will be delivered from venues with the necessary facilities to ensure safe and appropriate provision for service users. Specific venues for delivery will form part of the discussion and co-design with partners.
views that outreach services need to be regular and a "committed offer"	Yes – consistency within the offer, all the time that the need remains the same, is a key element of successful outreach delivery.
concerns that outreach may lead to a diluted service, that outreach is generally less well attended, and that some elements of service provision cannot be replicated via outreach (e.g. familiarity and relationships)	Outreach provision will be planned so that it is effective and meets needs. It will be appropriately promoted so that attendance is as anticipated. Outreach will be delivered by staff that also deliver services in KCC buildings, helping to support familiarity and relationships
particular concerns related to health visitors and outreach provision	The Health Visiting team has been involved in the planning of outreach so that requirements of the service can be incorporated into the proposals.
concerns about the impacts of outreach provision on particular types of service users (e.g. those with SEND may need reliability in terms of where outreach is delivered)	Wherever possible, reliability and consistency of delivery – in terms of location and team delivering the session - will be maintained and a co-design approach to outreach with our partners will

	<p>help achieve this. We appreciate that some service users may find change difficult. We aim to support service users manage this change so that they continue to feel as comfortable as possible accessing services during periods of change.</p>
<p>concerns about how particular areas of Kent have been dealt with in relation to outreach (particularly Sheppey)</p>	<p>The service view of the level of need in Sheppey was that the best way to meet the need is to deliver services via outreach directly in communities rather than making residents come to a KCC building in the first place. However, following feedback in the consultation, some of the revised options address this concern by proposing the retention of the Beaches site. The proposal will seek agreement from decision-makers for a co-design approach to outreach delivery, drawing on the knowledge and perspectives of partners including district councils, health and community partners.</p>

Concerns about digital	
Feedback	KCC response
<p>inclusivity and accessibility (including for particular groups, such as the elderly, and those with disabilities and mental health needs)</p>	<p>A universal digital offer is not proposed as a replacement, but more as an alternative service offer for those that choose to access provision in this way. The Need Framework highlights where the level of need is such that the universal digital offer is the appropriate level of service with areas of higher need being the focus for outreach and provision from permanent physical locations.</p>
<p>that four wards scored poorly in terms of digital connectivity</p>	<p>We are aware that there are areas of particularly poor digital connectivity across</p>

	<p>the county. Many of these areas of more rural locations currently unserved by physical buildings but that would potentially benefit from a co-designed outreach model. There are separate programmes of work that seek to address this issue in a number of ways. However, digital provision is not seen as a replacement, rather a choice for residents who are able to access information in this way.</p>
<p>concerns that digital delivery may be unsuitable for some services (such as services relating to domestic violence, mother-and-children services, and children’s services generally where concern has been raised about children’s “screen time”)</p>	<p>Face to face services will still be available across the county, directed by the Need Framework. Digital provision is offered as a choice, rather than a replacement. Digital provision will provide important signposting so that residents seeking services such as domestic abuse support will be able to find relevant information in one location rather than having to navigate through a range of different websites. Within the Family Hubs digital offer there is also the development of virtual services.</p>
<p>concern that some service users may in general prefer to access services face-to-face</p>	<p>Face to face services will still be available across the county, directed by the Need Framework. Digital provision is offered as a choice, rather than a replacement.</p>

<p>Feedback on Concerns about the broader environmental impact of the proposals</p>	
<p>Feedback</p>	<p>KCC response</p>
<p>for example as a result of more people having to travel further to access services</p>	<p>The modelling has considered the public transport network throughout so that the network is accessible without relying on private vehicles. A greater reliance on outreach provision will mean that residents from communities that would ordinarily</p>

	have required greater travel distances will be able to access service provision without needing to travel so far. The digital offer will mean that for those that choose to, information and virtual services will be available online.
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Feedback on Whether the costs of the proposals have been properly taken into account	
Feedback	KCC response
for example costs relating to the adaptation/refurbishment of buildings	Yes – these costs have been factored into the modelling and have been informed by feasibility studies.
observations made by some consultees that vulnerable children will not be able to access services they need, leading to greater future costs	The range of Family Hub services will be available to residents across a wide range of delivery methods, including face-to-face, outreach and digital provision. The model has been designed using a Need Framework, so services will be available where there is a need for them. The Family Hub model integrates more closely with partners and so families with vulnerable children will be able to access the services they need.

Whether KCC should make savings in other areas	
Feedback	KCC response
This will obviously require careful consideration and goes to the point about budgets we discussed last	The services in scope, including the Corporate Landlord service, are all required to make savings in line with the Council's

week.	Medium Term Financial Plan. The proposals set out at consultation contribute towards those savings whilst also responding to the strategic objectives set out in Framing Kent's Future. The final decision paper will include a 'Do Nothing' option, which will allow members the option to choose not to make savings here, but this will need to be balanced by making savings elsewhere across the council's budgets.
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<p>Accessibility</p> <p>you have been looking at accessibility as a key part of the feedback, and that an alternative option is being devised. It would be helpful to understand what elements of accessibility related feedback have been into account and how these have led to the updated building lists/the revised option which is being worked on. It seems to us that "accessibility" covers various points from the consultation feedback such as:</p>	
Feedback	KCC response
whether bus timetables have been considered	Yes – this has been considered and explicitly informs the options being considered by members.
whether the nuances of particular journeys to alternative provision have been considered (such as the accessibility of particular train stations)	Condition and accessibility of facilities outside of KCCs control has not been factored in to the KCP model. However, accessibility of alternative locations will help inform the specifics of a co-designed outreach offer, using the knowledge and input of other partners to inform the model.
the difficulties of using public transport, beyond additional journey times (such as carrying prams and reliability of services	Regularity of service has been factored in and explicitly informs the options being considered by members.

availability of parking	The modelling has considered the public transport network throughout so that the network is accessible without relying on private vehicles or parking provision.
difficulties arising as a result of the topography of particular alternative locations	Topography has not been considered within the KCP model as the Need Framework relies on identifiers of need such as the Indices of Multiple Deprivation and demographic data.

Outreach	
Feedback	KCC response
It also sounds like perhaps some changes to proposed outreach provision were being considered, and again it would be helpful to understand which elements of the consultation feedback this is a response to.	The feedback received around outreach centred primarily around the requirement for more detail. Additional detail on what services can be delivered through outreach was included within the Family Hubs service consultation. As a result of feedback to both consultations the KCP proposal seeks endorsement from members for a co-design approach to outreach delivery, drawing on the knowledge and perspectives of partners including district councils, health and community partners. This will mean greater flexibility in the delivery model that allows services to adapt to changing need in the future.

Feedback relating to specific individual buildings
Included as a separate document.

Equalities-related feedback

Addressed in suite of Equalities Impact Assessments submitted with Decision Paper.

Critical success factors

Feedback

KCC response

I have seen reference in the document you have sent me to KCC's critical success factors. It would be helpful to know how these factors and the weightings for these factors have been arrived at, taking into account that the factors include a weighting to be attributed to having a less costly estate. I also wanted to check whether these factor are designed to be a tool to assist decision makers in reaching a final decision on the proposals?

The Critical Success Factors are used to evaluate whether the proposals meet the four challenges set out in the KCP Rationale. These are:

- Need to lower revenue costs
- Need to reduce backlog maintenance cost liability
- Need to lower carbon emissions from KCC estate
- Need to provide more co-location sites to improve resident experience.

PART 2

Family Hub Consultation Draft Feedback Responses

<p>The importance of safe spaces for young people (separate environment needed for older children to enjoy activities with young people their own age), concerns raised around mixing children with vulnerable young people who are potentially at risk of exploitation (e.g., gangs, county lines etc.); a lot of comments on the need for safe spaces in terms of no judgement around gender identity, sexual orientation, disability</p>	<p>This is part of the service consideration, but where appropriate buildings will provide confidential spaces. Space can be timeshared between service so that sessions that would create a 'clash' are not held at the same time and the spaces can be arranged to suit the needs of the specific service uses.</p> <p>This is acknowledged in the relevant EqlAs as well.</p>
<p>References to importance of children's centres in rural communities and how will people be reached otherwise, causing further isolation in rural communities; with a number of specific comments around outreach to more villages as a need</p>	<p>Outreach in rural locations has been highlighted in the consultation and as a response 'rural communities' has been specifically identified as a category for outreach provision. The specific service offer for any given location will be subject to further agreement between the service and delivery stakeholders.</p>
<p>Appropriate spaces/appropriate purposes for the type of activities proposed (e.g., the same space could be used at different times for different purposes but is this appropriate and is the space adaptable enough/is appropriate investment being made) - e.g., the same space used for very young children is then not appropriate for young people who may want to see information about LGBTQ, substance misuse etc., and then for activities for vulnerable adults; questions around how can this be balanced given collocation of services</p>	<p>This is part of the service consideration, but where appropriate buildings will provide confidential spaces. Space can be timeshared between service so that sessions that would create a 'clash' are not held at the same time and the spaces can be arranged to suit the needs of the specific service uses</p>
<p>The size of a space – if a building hosts multiple agencies/services, it may lose the feel of a local Children's Centre</p>	<p>The Family Hub model brings together partners to offer a wider range of complimentary services in a single setting. Where the Family Hubs are proposed to be co-located with other service areas, the spaces will be</p>

	<p>designed so that Family Hub service users feel welcomed. The ability to access services outside of the Family Hub offer – for example library services – from the same location is proposed to enhance the user experience.</p>
<p>Feedback from respondents around rurality – link to outreach; some comments draw to the potential scenario where those living in rural locations will end up being affected the most as won't have access</p>	<p>Outreach in rural locations has been highlighted in the consultation and as a response 'rural communities' has been specifically identified as a category for outreach provision. The specific service offer for any given location will be subject to further agreement between the service and delivery stakeholders. The Kent Communities Programme has re-examined transport networks as a result of the consultation feedback received and this re-examination has been used to develop the alternative options for member decision.</p>
<p>Ease of access is vital for families, especially those without transport; a number of comments around how this will be mitigated and questions around how deprivation has been factored into provision (affordability of fares, transport timetables etc.)</p>	<p>The Kent Communities Programme has re-examined transport networks as a result of the consultation feedback received and this re-examination has been used to develop the alternative options for member decision. Deprivation data was used to inform the needs framework which underpins the Kent Communities model.</p>
<p>The use of venues already in the community as people will feel more familiar and be more comfortable in using these</p>	<p>The Kent Communities proposal focuses on meeting identified need within KCC's network of buildings. So long as any solution can be justified in terms of meeting need, there is no reason why in the future opportunities to use alternative locations cannot be considered.</p>
<p>Services need to be local or else they will not be accessed by those who most need them. Rural centres like Cranbrook are vital in rural areas. Families who need the services and support the most will not travel to Tunbridge Wells or</p>	<p>The proposal is to relocate the Children Centre in Cranbrook to share space within the Library – approximately 0.1 mile away from the existing Children's Centre. Both the Children's service and Library service have been involved in the</p>

<p>equality far hubs. keep childrens centres open. they are so important to new parents</p>	<p>assessment of the feasibility of this proposal and are agreed that the space is suitable for both service uses.</p>
<p>Locality to areas not a major hub out of area. People and children need to be able to access it easily.</p>	<p>The Kent Communities Programme has re-examined transport networks as a result of the consultation feedback received and this re-examination has been used to develop the alternative options for member decision</p>
<p>Depending on where they are located, it may become difficult for people to actually reach these hubs. It sounds like the services on our doorstep, within walking distance will be scrapped and we'll be forced to travel to a hub to access services- this will incur costs as well as time inconvenience and bad for the environment as I'll have to use my car instead of just walking.</p>	<p>The Kent Communities Programme has re-examined transport networks as a result of the consultation feedback received and this re-examination has been used to develop the alternative options for member decision. Services from permanent 'KCC' buildings are only one part of the service delivery model. Alternative methods of provision include Outreach where services are delivered in the heart of communities, and online provision also make up the service offer.</p>
<p>Accessibility in terms of proximity to and frequency of bus services and cost of getting to the hubs.</p>	<p>The Kent Communities Programme has re-examined transport networks as a result of the consultation feedback received and this re-examination has been used to develop the alternative options for member decision</p>
<p>The main thing that concerned me when reading the summary document, was that you are trying to make cuts to activities, groups and centres look like a good thing by covering it up with "family hubs". When in reality it is actually a huge cut to resources, the loss of childrens centres (which would then mean many families would lose access to these vital services if they don't drive for example, and with the cuts to the bus services on Romney Marsh too). I can see the sense in streamlining the services so everything is in one place to access, but this needs to be properly</p>	<p>The Kent Communities Programme has re-examined transport networks because of the consultation feedback received and this re-examination has been used to develop the alternative options for member decision. The Kent Communities Programme responds to the fact that Kent has too many buildings to manage effectively, and the services need to be able to staff the locations effectively and sustainably.</p>

<p>resourced, with enough staff and funding to make it effective. Otherwise residents are just going to lose access to vital services they need.</p>	
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