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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
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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](#)