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Change Process Improvements update

1. Purpose

This paper provides an update on the feedback SECAS has received from participants in relation to the SEC Modifications Process. It also outlines the activities being undertaken and the next steps in delivering improvements and solutions to the issues identified.

2. Background

At the February 2019 Panel meeting[1] we highlighted our intent to engage with the wider industry to better understand any issues they had with the Modifications Process. We believed it important to truly understand the problems that needed fixing before attempting to fix them.

Since this meeting, we have met with a number of different Parties from each Party Category in an attempt to identify the key issues faced when dealing with the Modification Process. The aim is to rectify the concerns in order to give Parties the best possible experience of progressing change.

In this paper we have summarised the feedback received and set out the improvements that are being, or have been, delivered to help resolve the issues.

We would also like to take the opportunity to thank all those who have found the time to engage with us and share their experiences and ideas to help us create the best solutions possible.

3. Feedback

To make the feedback easier to digest we have summarised the key points and grouped them into the sections below. Each section also notes what work has been completed, or is underway, to rectify the issues highlighted.

A high-level plan for the delivery of the required activities can be found in Appendix A to this paper. As previously noted to the Panel, to help monitor the development and implementation of any improvements, the activities in the plan are split between the three core phases of the Modification Process: Define, Refine and Opine.

[1] Please see Panel paper SECP_65_1502_17 for further details.

3.1 Raising and defining Change

Parties agreed that one of the biggest issues with the Modifications Process was a lack of an up-front 'filter'. It was felt that a great deal of precious time and resource is put into progressing modifications that have little support from the wider industry and which are ultimately rejected. Lack of clarity over the problem a modification is trying to solve was also at the heart of this issue. Many felt that Working Groups wasted time discussing whether or not an issue really existed or trying to develop a solution for a proposal that was not clearly thought through. Whilst it was acknowledged that SECAS has little power to stop modifications being raised, it was felt that we could do more to help provide the critical friend role and shape modifications.

Some of the Parties we spoke to also felt that there should be a single, simple way to raise change. The combination of complicated proposal forms and multiple additional entry routes (such as issues, Issue Resolution Proposals (IRPs) and BEIS designations) made it all very confusing. It was felt clearer guidance could be provided to help those unfamiliar with the process.

What are we doing?

On 4 March 2019, the new Development Stage went live. The primary purpose of this new stage is to rectify the very issues highlighted by Parties. It seeks to ensure that all proposals have clearly defined problem statements and that the potential impacts of a modification are considered up-front. The Parties we spoke to are very supportive of this new process and are excited to see what it can achieve. This process has only just been introduced but its potential impact should not be overlooked; if delivered correctly it could really help resolve the issues identified.

Nominations for the Change Sub Committee (CSC), who will oversee the Development Stage, are due to close on 15 March. If no elections are required, we aim to hold an initial meeting of the group by the end of March; otherwise the first meeting will be in the week commencing 8 April.

SECAS providing the critical friend role is essential to make this process work. We intend to work with Proposers to help shape their proposals and assist in pulling together all the relevant information the CSC may require. We have already put in place new working practices with the DCC in order to drive earlier input into the change process and are hoping to see the benefit from the efficiencies we have introduced.

To help support the new stage we are also introducing new webpages and guidance to help Parties raise change and understand the process better. The guidance will be available as both a document and a short video to help those with document fatigue.

3.2 Working Groups

After the need for a Development Stage, the next biggest area of feedback was on the use of Working Groups and how to get greater industry input into modifications.

A number of those we spoke to feel the current concept of Working Groups to be fundamentally wrong. They believe that the current process favours larger Suppliers who could send representatives to all the meetings, which led to solutions being created by a handful of industry members. Others noted that, regardless of the size of their business, they struggled to attend Working Group meetings because they had to prioritise their time and lacked the bandwidth to attend multiple Working Groups as they appeared. It needs to be easier for those who are interested in a change to put their views forward without having to attend a Working Group meeting.

A key point that kept arising was getting the right people involved in the discussions at the right time, and that avenues should be explored to seek technical expertise outside of relying on the Working Groups to do all the development.

Some noted that the principle of getting subject matter experts took a back seat to bureaucracy that dictated burdensome quoracy rules. Some respondents shared that they had joined Working Groups simply to meet quoracy thresholds and to get the changes moving through the process. This should not be the case. Addressing the issue should be the driver for industry time not meeting quoracy rules, particularly if you can seek input from other means outside meetings.

Those we spoke with also felt strongly that the mechanics of the Working Group meeting could be improved. It was generally felt the purpose of a Working Group was unclear: was it to help design a solution? Drive the change through? Review a strawman? Every meeting felt like the purpose was different and this has led to a disjointed approach. It has also meant that it has proved difficult to be prepared for meetings, as some require more technical knowledge than others. This often results in long journeys for participants, only to have a short meeting, since the questions have to be taken “back to base”.

The role and responsibilities of a Working Group were also felt to become confused when it came to developing alternative solutions. If the Working Group had advised the Proposer, and they chose to ignore the comments, then why was the Working Group spending a lot of time developing a “best worst-case scenario”; they should just vote to reject the change with clear rationale, rather than putting more time and effort into a proposal that was not supported. The Parties we spoke with also considered it to be a good idea to provide the Panel or SECAS with the power to withdraw modifications to stop nugatory work occurring.

It was also felt by some that alternative solutions should be owned by a single person; that way it relies on a Proposer to drive the change through and take ownership rather than needing group collaboration. This was more in line with the principle of Proposer ownership. It also encourages collaboration rather than the situation arising of Proposer versus Working Group. For that reason, it was felt that Working Groups should advise on solutions, but if someone felt strongly enough to raise an alternative, they should raise their own proposal.

Parties also noted they would like to see SECAS driving the changes more outside of Working Group meetings. This again reflected a general lack of clarity over the role and responsibilities of those involved in the Refinement Process. It was felt that agendas issued prior to meetings could be clearer, and effort should be made to get the technical documents published as soon as possible to assist in the debate on the day. Minutes from Working Group meetings should also be published in a more uniform approach so those who could not attend could see the key discussion points and the direction of travel.

What are we doing?

Based on the feedback received we have overhauled the way we run Working Groups. Rather than sporadic one-off meetings, we will hold scheduled monthly Working Group meetings that will cover multiple Modification Proposals on the same day. The intent is that batching changes in this way means industry members can schedule their time more effectively and are aware when SEC change will be discussed in the month. It also allows for scheduled updates to be published on the SEC website following Working Group meetings, so Parties do not run the risk of missing out on key updates.

Draft agendas and required paperwork will be published online as they become available, with a final agenda being issued at least five Working Days before the meeting. The agenda will highlight any specific questions that will be asked of the Working Group for a specific modification so that members can come prepared to answer any questions or raise any concerns from their own technical teams. Agendas will clearly set out the running order for the day, so Parties can attend for those modifications they are interested in and not have to sit through the whole session. The batching of proposals into a scheduled meeting also allows us to offer video conferencing for those Parties who cannot attend the meeting in person. The first monthly Working Group meeting is due to take place on 3 April 2019 (and will continue on the first Wednesday of each month).

The primary purpose of the Working Group will be made clearer. The monthly meetings are there to allow Parties to review strawman solutions for each modification. In order to make this as effective as possible, SECAS will work with the DCC and Proposers to ensure there is a suitable strawman solution available before going to a Working Group meeting, including the completion of a Preliminary Assessment, where applicable. To make sure that the strawman is fit for purpose, we will publish details and requirements on the SEC website as the solution is being developed. We will keep Parties up to date as the solution is fleshed out and encourage feedback as it develops. Any feedback we received from Parties will be published on the website “live” alongside the draft solution so that others can see the views that are emerging and what is being done to address issues raised. The planned website updates at the end of March will allow us to start publishing strawman development in this way.

We will also ensure that any strawman solution has been through the relevant Sub-Committees before it goes to a Working Group. This ensures that the Working Group discussions can get past the question of “what do this Sub-Committee think of this?” and also, that time is not wasted in discussing a solution that may be fundamentally flawed in its design. A presentation on how, when and why Sub-Committees get involved in the change process will be taken to the Sub-Committees over the next month to update them and clarify roles and timings.

Based on the feedback received we believe it prudent to review the Working Group Terms of Reference document, in particular with regards to alternative solutions and quoracy. However, other changes may be required following the start of the scheduled monthly meetings, so we believe it is sensible to bring amended terms of reference to the Panel in May 2019.

3.3 Consultations and wider input

As noted above, one of the key areas of feedback was getting the right people involved at the right time when progressing changes. Whilst we have looked at how to make that easier during the development of a solution through more dynamic publication of draft solutions and more efficient Working Group meetings, we also need to review consultations.

It is not just the SEC, but all industry codes, that struggle to get a consistently high level of responses to consultations on change. In discussing the issue with Parties, one of the reasons for not responding is that time is pressing, and if the change does not have a great impact on them then they tend to ignore the consultation. Parties also felt there was a lot of documentation to sieve through in both reading consultations and in responding.

What are we doing?

Monthly Working Group meetings means it is easier to batch change for consultation and to highlight on a timetable when that consultation is likely to be. This will allow Parties greater time in preparing for consultation responses. We also want to put greater consideration into when consultations should close. If there is no impact on the potential implementation date or other drivers, then why not give Parties longer to respond? We can start the process of batching consultation timetables following the first Working Group meeting in April.

We want to make it easier for Parties to see the impact a proposal could have on them. To this end we are planning on holding webinar sessions when each consultation is issued. This will allow those interested Parties to listen to a description of the modification(s) in the consultation and to ask any questions they may have. In order to cover the widest audience as possible, the webinars for the consultations will remain online during the course of the consultation, so anyone wishing to respond can simply replay the meeting to hear what was discussed.

We are also seeking to make it easier to identify those modifications that Parties would be interested in, by shortening proposal titles and creating an updated impact matrix. In order to help create a beneficial impact matrix we want to discuss further with Parties to see what it is they would like highlighted. We believe we should have a more intuitive way of identifying relevant impacts by May 2019.

To help Parties respond once they have seen a consultation, we plan on having a more dynamic method of capturing views. Webpages for modifications will display responses as and when they are received, so Parties can see the number and types of views expressed immediately, rather than waiting for publication of the final consultation responses. We are also going to encourage Parties to respond by phone or email rather than lengthy response forms, particularly if the response is neutral of the outcome. In the longer term, we also envisage a more collaborative online platform where Parties can easily share thoughts and ideas. We will update the Panel as we investigate plausible options and see how the initial changes take.

Guidance is also crucial to help Parties understand the best time and methods to get involved in change. As with the Development Stage, we plan on issuing new guidance via video and document when the website is updated at the end of the month.

3.4 Transparency

Parties find it very difficult to see where a modification is within the process and what the next steps for progression are. This is especially true once a modification enters the Refinement Process. Those Parties we spoke to found it time consuming to find out what was happening with a modification and wanted to more quickly see where a change is. In particular, Parties wanted to easily identify if a modification was on hold, whether work was being done or if it was with the DCC for assessment. Some believed it was important that it should be clear where the process delays have occurred, whether that be due to Working Groups, SECAS or the DCC.

Whilst there was appreciation of the Modifications Register, it was felt that it did not go into enough detail on the progression of a change, and that amendments could be made to allow for easier filtering of information. Parties also appreciated minutes from Working Group meetings but noted that they were published at different times and varied in consistency.

What we are doing?

Rather than present the Panel with a long Refinement Process timetable, we are going to take a series of shorter, more detailed timetable steps. This provides the Panel with greater oversight of the process, and greater clarity to Parties who can see what action is being undertaken in any given period. This will stop modifications from disappearing into a long Refinement Process. To this end, we have prepared a revised set of timetables for all modifications currently in the Refinement Process using this approach – please see Panel paper SECP_66_1503_12.

As noted above, the website refresh at the end of March means modification pages will be easier to navigate and will each contain a clear summary of the current status of the modification and next anticipated steps. The Modifications Register will also be updated following this Panel meeting to make it easier to search and provide a clearer breakdown of where a modification is in the process, highlighting the shorter timetable and action plans agreed by the Panel.

We have received positive feedback on our newsletters and blog articles, but are aware of the feedback that there are too many documents to read. Therefore, we are launching our new audio change update “Modcasts”. Modcasts will be a weekly update of anything a Party may have missed during the week and will provide a snapshot to where proposals are in the process and any key upcoming events. Modcasts will be available to download as a video/audio file every Friday from the SEC website, with the first Modcast to be issued on 15 March.

We are also reviewing the Change Status Report to make it more fit for purpose. The new Change Status Report will be presented to the Panel at their April 2019 meeting.

3.5 Releases and cost of delivering changes

Confusion still remains over the SEC Release process. This is mainly due to the continuation of BEIS designations during the transition phase, but also a feeling that the DCC are driving the scope of releases rather than using the processes previously agreed.

There was also confusion regarding configuration management and version control, particularly with the Technical Specification Applicability Tables and differing versions of the GB Companion Specification (GBCS). It is felt there must be a simpler way of managing all the documents, and that the arrangements from the transition period should not blindly be followed in the enduring regime.

The cost of implementing change was also mentioned by those we spoke to. Parties echoed the well-documented concerns raised by the Panel of high DCC implementation costs stifling change and asked for greater transparency of cost breakdown. Parties also felt that the DCC should be held accountable for these costs if they did not improve.

What we are doing?

The DCC cost benchmarking study is due to be completed in March 2019. Once the findings of this review are shared we will revise the necessary areas of the Release Management Policy to improve the current process and make it simpler to follow.

We are also working more closely with the DCC in establishing accurate costs for change as early as possible. This is in conjunction with the closer working relationship being employed during the Development Stage, but also in finding better ways to collaborate during the Refinement Process so that requirements are clear, and any issues are addressed quickly and easily.

We are hopeful that with the new joint ways of working and the results of the benchmarking review we will be able to make a real difference to the costs that are seen in Modification Reports, and the speed with which the DCC returns responses to assessment requests.

4. Next steps

With the implementation of the Development Stage, monthly Working Group meetings, Modcasts, new webpages and guidance, there will be a flurry of activity over the next month. However, we do not expect the improvements to stop there. The process and services we provide must continue to adapt and grow. As such we are encouraging Parties to constantly provide feedback to us on the processes to see where we can improve. A new webpage highlighting the work to date and seeking further input for this will be appearing on the SEC website shortly.

As noted above, Appendix A provides a high-level plan that sets out the key activities over the next few months, so the Panel and Parties can see what deliverables are due when.

5. Recommendations

The Panel are requested to:

- **NOTE** the contents of this paper.

Adam Lattimore

SECAS Team

8 March 2019

Attachments:

- **Appendix A:** Workstream summary plan-on-a-page