Meeting	OLB Board	Agenda Item No. Paper No.	14 123.9
Date of meeting	20 October 2022	Time required	15 minutes

Title of paper	Scheme Rules Review – progress update	
Presented by	Steve Pearson	

## **Executive summary**

The attached paper summarises the work that has been done so far and the plans that have been set out for the implementation of the new Scheme Rules.

We are currently working to an April 2023 go live date – we believe that this timescale strikes an appropriate balance between our desire (and that of our stakeholders) to introduce the new Scheme Rules as quickly as possible and the importance of ensuring that we do not take action that will destabilise the performance delivery trajectories set out in LeO's business plan.

As has been explained at all stages of the Scheme Rules review process, the amount of work required before the revised Rules can go live is significant and is something that touches all areas of LeO.

- Operations changes to business process and case management system, changes to templates, training, guidance, testing of new system, planning for dual running.
- IT changes to process and case management system, changes to website and complaint forms, capturing EDI data.
- External affairs comms strategy for engagement with sector, regulators and consumer bodies to raise awareness of changes. New guidance, factsheets etc. Internal comms strategy
- BI capturing data and reporting on impacts of changes. Delivering reporting on an ongoing basis
- HR updating all impacted internal knowledge and learning, changes to induction and training.
- Service Improvement updating quality assurance framework, testing and moderation of application of ombudsman discretion

The attached paper shows that we have implemented a clear project plan to ensure that we are able to deliver all of the key aspects of the Scheme Rules update by deadline and that we do so in a sustainable way.

Key to our ability to monitor and evaluate the impacts of the Scheme Rules is our ability both to capture EDI data at a much earlier stage of our process and to cross reference that data against various different closure codes. We are currently working both internally and with our external providers to be able to capture EDI data from customers when they first try to access our process (via the online complaint checker). We are also working to be able to start doing this in advance of the Scheme Rules going live so that we can have baseline data to compare future data against.

We have committed to implementing all the changes at the same time rather than delivering them in stages. Although this means more work and a greater risk of impact it does al mean that we can make best and most efficient use of our resources.

We will continue to keep Board updated on progress as we move towards 2023.

## **Recommendation/action required**

Board is asked to note the action plan outlined in the attached paper.

## Scheme Rules – Programme Overview – October 2022

Leading on from the scheme rule consultation approval in early July work progressed to finalise the scope for this programme of work. The changes outlined are complex and multifaceted and affect all areas of LeOs business. The scoping phase therefore had to ensure all stakeholders both understood the proposed changes; the impact to their area of the business and were also provided an open forum to discuss the planned work and raise any questions, concerns, risks, and issues.

We recognised early in the process that the changes needed to and could be separated into defined areas for efficiency and ease of communication. To this end four definitive areas were outlined and for each area a number of cross functional scoping meetings were held to define the who, what and how of the work

- Time Limits
- 5.7 Changes
- Ombudsman Decision
- Less significant changes

The discussions mapped out the defined workstreams and brainstormed the proposed implementation ideas. As an example, for the Time limit changes, we followed the outlined change through the customer journey, beginning at the first point of contact i.e., the LeO website. The pre-screening questions, currently including time limit jurisdiction questions, would need to be updated, and the related web page logic amended. All website pages, documents, guidance, factsheets would need to be reviewed and updated, or new documents created to communicate and explain the new rules.

The work then moves through the case management process. We analysed and assessed each change in CMS and outlined the planned work inclusive of the creation of new fields in the system, to both facilitate the new changes and to provide the required level of reporting. Existing workflows and business process maps would also need to reflect the new rules. All changes in CMS need to be supported by updates and amendments to the data warehouse which is also the source data for all our reports. The reporting work was sized, considering the data we would require, the proposed amendments to existing reports and any new or supplementary report requisites.

For the Operations department, the work required includes the review and update of all process flows, letter templates, internal and external guidance and training and induction. This is a large amount of work and to scope we reviewed all documentation inclusive of web guidance to size the task and highlight any potential challenges. The training materials update is to be completed in January and work is in progress to plan the mode and delivery of this training to ensure minimal impact to business-as-usual activities.

An initial external and internal communication strategy has also been defined outlining the key deliverables for these areas. It is critical for the successful delivery of this programme that we engage all our stakeholders and take them with us on this change journey. For our external stakeholders, transparency and collaboration is essential as they will be led by LeO as to when they will need to prepare and provide documentation and website changes for their consumers.

The areas of impact assessment and success criteria have also been assessed and key measures and methods of data collection outlined. The availability of the required data has been cross referenced with the work on CMS and reporting as we can only measure using

data we are collecting. In completing this work, it was identified that to tangibly measure the impact of the changes on any protected groups we would need to collect EDI data from our consumers earlier in our process. We currently collect EDI data during the assessment phase however to fully understand the impact of the changes we would need to collect data much earlier. The proposed solution has been progressed as a separate project with possible options defined. We are at present awaiting technical approval of the directions proposed. The objective is to implement this solution in Q3, prior to the scheme rules launch, enabling us to collect base line data before the launch of the scheme rules changes.

This collaborative, scoping approach has been adopted for all four of the projects above and has resulted in us having defined and approved project scopes in October and moving into the delivery phase of the programme. This has been formalised with the completion and passing of project gate meetings where the Executive team have reviewed and approved the project direction.

This scope definition has underpinned the work completed to outline a project timeline. The launch date is confirmed for the 3rd of April 2023. The agreed approach is to complete the specific area of work for all projects at the same time i.e., all CMS development work for the Time limits, 5.7 changes, Ombudsman Decision and SR4 projects will be completed at one time as will the associated testing and deployment. An overview of the timeline is outlined below but it should be understood that this is a dynamic view and will be updated weekly as we progress through the project delivery.

The Scheme Rule programme has monthly PCBs alongside the discussed scoping. Any issues and risks are escalated through the monthly Programme Board. As we are now in the delivery phase weekly project meetings have been scheduled to ensure the work is on track and also that any issues, risks are discussed promptly, and plans outlined to mitigate or escalate as required.

