MOVE OF IT SYSTEMS FROM SHIRE HALL DATA CENTRE

То:	General Purposes Committee			
Meeting Date:	28 May 2019			
From:	Director of Corporate and Customer Services			
Electoral division(s):	All			
Forward Plan ref:	2019/038	Key decision:	Yes	
Purpose:	To advise the Comr	nittee of:		
	 The preferred option and technical approach currently under consideration for the relocation of Shire Hall data centre and/or the data it houses. 			
	• The cost and resource implications of relocation.			
	This paper draws on work carried out in November 2017 to inform options and associated indicative costs.			
	The paper assumes that the data centre in the Octagon will be disposed of at the same time as Shire Hall and therefore that the deadline for migration of data services is December 2020.			
	This paper details the County Council and the Shire Hall Data (LGSS provided	Cambridgeshire services of the sale of	
Recommendation:	General Purposes 0	Committee is req	uested to:	
			n to relocation of the of this document.	
	b) Agree funding fo 5 of this docume		as detailed in Section	

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1. BACKGROUND

- 1.1 The Council's data centre is housed in the ground floor of the Octagon building. On the assumption that the disposal of Shire Hall will include the data centre it will need to be rehoused, or the facility hosted elsewhere. Alternative options that have been considered are referred to in Section 3 of this paper.
- 1.2 The data centre is a high-spec, temperature controlled facility comprising multiple servers, cabling and fire-suppressant equipment. More importantly, it holds all the Council's business critical data as well as back-up and live data for LGSS, Northamptonshire County Council, Milton Keynes Council, LGSS Law, 3CS and the Cambridgeshire ICT Services to schools. It is where Cambridgeshire County Council IT users draw their data from on a daily basis and is therefore fundamental to all CCC service delivery.
- 1.3 The overall value of the data centre in terms of hardware, power etc. is approximately £3 million. In terms of information held and services delivered its value is immeasurable.
- 1.4 Volumes of equipment hosted in the data centre
- 1.5 In total the datacentre contains 22 racks worth of equipment plus various circuits for external systems such as traffic lights. The ownership of racks breakdowns are as below.

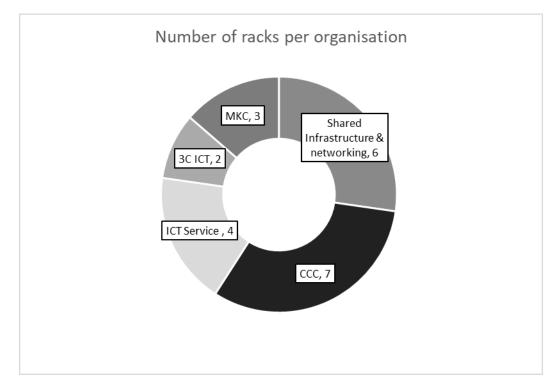


Figure 1.2 – Volumes of equipment hosted in the data centre

1.6 As a facility the data centre presents both an ongoing revenue cost (power and maintenance contracts) as well as periodic requirements for capital funding (refresh or replacement of equipment that is end of life).

2. STRATEGIC CONTEXT

- 2.1 Cambridgeshire County Council /Peterborough City Council strategy
- 2.2 IT services are fundamental to the successful sharing of services between **Cambridgeshire County Council (CCC) Peterborough City Council (PCC)** and the IT strategy to achieve this is currently being defined. The vision is shown below.

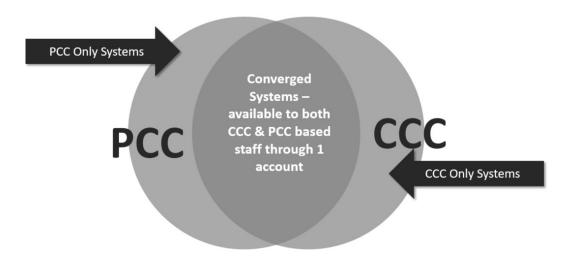


Figure 2.1 - Vision of shared IT Services for PCC & CCC

2.3 Key to delivery of this vision is a move to cloud services (Office 365) for existing Microsoft Office productivity software such as email, Word, Excel plus other new tools and functionality available in the suite. Equally fundamental to the strategy is the convergence of business systems (e.g. Mosaic & Liquid Logic) and a shared infrastructure.

2.4 LGSS IT Strategy; why choose Cloud first?

- 2.5 LGSS IT has produced a comprehensive strategy which has been reviewed and approved by Gartner¹ and can be applied to CCC. This strategy sets out a Cloud first converged approach for both traditional IT services and for digital services. But, why choose a Cloud first strategy at all?
- 2.6 One reason is the 'push and pull' effect; there is both a technical push from suppliers to host their systems in the Cloud and a pull resulting from the multiple benefits that Cloud hosting realises, such as:
 - Innovation
 - Security and governance
 - Citizen self-service
 - Flexible and collaborative working
 - Access to a far greater range of digital services
 - Automation of services where possible

¹ Global research and advisory firm providing insights, advice and tools for leaders in IT.

- Rationalisation of business systems
- Integration of IT systems
- 2.7 An extract from the LGSS IT strategy states:

"As local government authorities seek to do more with less, hybrid clouds seem like a natural fit. They allow IT to shift workloads between internal datacentres and a public cloud provider during peak periods. Cloud computing can reduce costs while boosting project flexibility. Digital transformation is a key driver for Local Authorities to allow citizens to interact and complete tasks effortlessly. Cloud technologies are more than often enablers of Digital Services"

- 2.8 It goes on to describe how a well-developed, centralised cloud strategy which is informed by business strategy, provides strong foundations for governing the use of cloud services and that there are tangible service and cost benefits if it is carried out correctly.
- 2.9 Conversely, where a centralised cloud/cloud first approach is not adopted, organisations risk a piecemeal cloud migration resulting in issues around compliance and security, and significantly higher costs.

2.10 Cloud adoption strategy

- 2.11 Transformation to digital services offers great opportunities to interact with citizens in a more effective and efficient way. Cloud hosting enables IT teams to support the fast delivery of these digital services instead of using their resources to maintain a data centre.
- 2.12 The long-term plan is to move CCC IT systems to full cloud hosting of its data and therefore it might seem reasonable to assume that this is the approach to take for the 2020 data centre move. However, moving to the Cloud by the 2020 deadline will only allow for the minimum level of services to be fully cloud ready and would still be a major undertaking due to the multiple software updates required and because many applications are interlinked, making partial migrations very difficult.
- 2.13 In order to realise the full transformational and financial benefits of cloud hosting, there needs to be a strategic approach to the data centre move and the associated move to the cloud. The LGSS IT Strategy for cloud hosting assumes that the majority of business applications could be transformed into the Cloud over a period of 3 to 4 years. This would gradually reduce the use of a data centre and make the migration of any remaining applications a relatively simple task. In addition, it would allow each system to be migrated at the optimum possible level thus avoiding retrospective transformation of applications. In the case of the CCC data centre this 3 to 4 year period would begin in earnest once the data centre move had taken place. A data centre typically has a life cycle of 4 to 5 years and a data centre will continue to be an on-going requirement for the organisation, and any partners it hosts, for legacy/historic data even when the Cloud first strategy has been fully implemented.
- 2.14 The transformation of IT service delivery will involve both cultural change and the adoption of new skill sets which implies extensive communications, training and change management. This in turn relies on commitment from the leadership in the form of funding, advocacy and time.

2.15 Figure 2.1 illustrates the process of evaluating and determining how each system should be hosted, the inputs that inform this decision and the ideal outcome with the minimum number of services being hosted on premise.

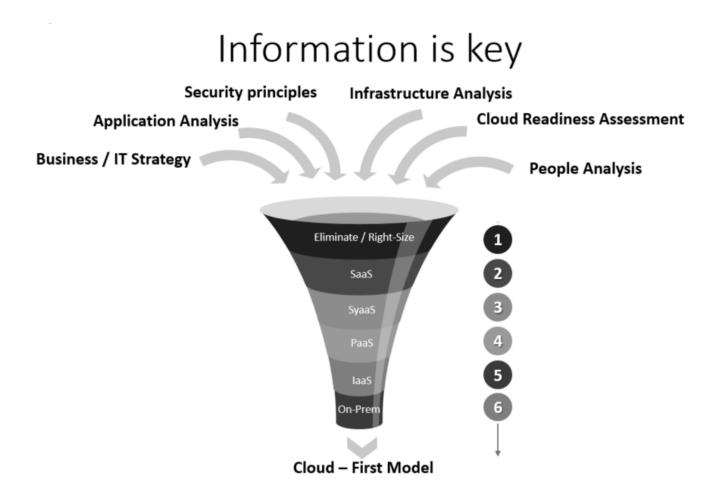


Figure 2.1 – Best practice approach to migrating to cloud based services

- 2.16 Terms and concepts:
 - 1. Eliminate/Right size Rationalise applications to reduce duplication and overall number.
 - 2. **Software as a Service (SaaS)** we 'consume' products that have been developed by the cloud providers (e.g. Microsoft Office).
 - 3. **System as a Service (SyaaS)** Typically large Line of Business systems (e.g. Liquid Logic for Children's) hosted with providers but where we are responsible for the system configuration to ensure it conforms to and supports our business processes.
 - 4. **Platform as a Service (PaaS)** these are a variety of software 'tools' or building blocks used to create other (typically Digital) products used in services such as the Blue Badge application process.
 - 5. **Infrastructure as a Service (laaS)** Servers and other infrastructure that works the same and is configured in the same way as servers in the Shire Hall but which are

hosted by Microsoft (Azure), Amazon (AWS) or other providers. Best used for services that can be switched off when not needed or that need to be scaled up or down quickly.

6. **On Premise (On Prem)** – Physical servers, storage (SAN) and networking located on a site such as the Shire Hall data centre providing IT systems and services.

3. OPTIONS

3.1 Six options have been considered for housing the systems and data currently based in the Shire Hall data centre:

Option 1: Defer the Shire Hall data move and carry out a phased migration to the cloud in line with the LGSS IT Strategy and the sharing of services with PCC.

This is an attractive option from a strategic, financial and service delivery perspective but it is unrealistic given the indicative value of the current offers for Shire Hall and the associated timeline for disposal of December 2020. Should there be scope to negotiate an extended timeline for a departure from the area where the data centre is housed on the Shire Hall site this will be used to mitigate the risks of the recommended option – see below.

Option 2: Build new data centre housed in the Council's new building at Alconbury. This option has been ruled out as the new building at Alconbury will not contain a data centre.

Option 3: Move entirely to the Cloud by 2020.

Unlike Option 1, moving entirely to the cloud by 2020 would necessitate extensive use of the most expensive cloud services (IaaS) making this is one of the higher cost options. This would be a 'lift & shift' rather than a systemic transformation of services. It would add no value strategically or operationally and comes with higher running costs of £117,618 per month for Cambridgeshire systems and data.

Although expensive, this option would be perhaps be the most expedient for Cambridgeshire as it could mitigate any effects of the move overrunning.

Note - Partners with systems in the data centre would also need an equivalent service, at this point costs estimates for partners are not available but are likely to be equivalent for each partner.

Option 4: Colocation (CoLo – a type of commercially hosted data centre where equipment, space, and bandwidth are available for rental to retail customers).

Although this can be implemented quickly and does fit a cloud first strategic approach, it is prohibitively expensive.

Option 5: Host the majority of the systems and data from Peterborough (Sand Martin House the main office for Peterborough City Council). Although this option comes with considerable operational and technical risks, with appropriate capital investment it is achievable without impacting upon other priorities for the delivery, or transformation, of critical IT services during the same timescale as the data centre move. Whilst this option is costly it is less expensive than options 3 & 4

Option 6: Hybrid option - Migrate selected critical systems to the Cloud with remaining systems and data hosted from Peterborough (Sand Martin House).

This reduces some of the risks highlighted in option 5 by ensuring the most critical systems are cloud hosted (and sharable with PCC) prior to the move of the data centre. Should there be scope to negotiate an extended timeline for a departure from Shire Hall (Option 1) this will be used to further mitigate these risks.

The capital costs of this option are significant but it is less expensive than options 3 and 4.

The revenue costs of option 3 have been included into this option to provide contingency.

4. RECOMMENDED APPROACH

- 4.1 The recommended approach would migrate selected systems and data to the cloud and relocate the remaining systems to Peterborough as per Option 6. This entails migrating email, calendar and SharePoint data into Office 365, a cloud based system, and migrating key Line of Business systems that will be shared with PCC (e.g. Mosaic) into to a shared, cloud based infrastructure. This infrastructure can then be expanded over time to host other shared business systems in line with the emerging CCC/PCC IT Strategy. This work supports the strategic direction but it is an iterative process.
- 4.2 The rationale for this option is to:

Minimise risk

- By looking at the best technical approach to minimise risk e.g. balancing off moving some systems to the Cloud whilst moving the remainder to Peterborough, migrating e the systems/data to new equipment in Peterborough rather than moving the existing equipment from the current data centre
- By looking to negotiate an appropriate timeline with preferred bidder for a phased departure from this area of Shire Hall

Deliver at lowest cost:

- By using an existing building, Sand martin House, with the physical capacity & environmental controls to house our Data Centre rather than build new
- Through ensuring we are not driven into the most expensive Cloud solutions, with associated exit costs, by maintaining an On Premise capability in Peterborough whilst managing our migration to the most appropriate, cost-effective Cloud solution
- 4.3 The IT systems in scope for this project are complex in nature and span multiple local authorities which means that there are a number of unknown areas and associated risks, summarised in Appendix A. The emerging IT Strategy to support sharing of services with

PCC will be presented to GPC in July and the approach to this project is informed by and in turn influences that strategy, in particular in the shared infrastructure.

4.4 Within the recommended option (Option 6), several viable technical approaches are under consideration and the detail of these will be refined and amended as other decisions are made, for example sign off of the IT Strategy and the results of formal engagement with partners. As the technical, information and business risks around the actual move of the systems and data are high, preference has been given to the option of purchasing new equipment and moving services to that new equipment one at a time. This 'de-risks' the move by avoiding the need for a 'big bang' move of systems, ensuring continuity of service for Cambridgeshire. This new equipment could be purchased in partnership with and shared by PCC and therefore facilitate further sharing of systems between the two organisations. It is noted that this option does come with a higher up front cost than the alternative (moving the existing CCC equipment from Shire Hall to Sand Martin House) but significantly mitigates the risk of this move to critical operational IT services.

5. COSTS AND GOVERNANCE

- 5.1 This is a transformational project supporting Cambs 2020 (Office 365 capability) and the shared service with PCC (data centre/shared infrastructure).
- 5.2 The options and the overall approach outlined in this paper have been reviewed and approved by the Cambs 2020 Project Board and the initial financial bid reviewed and approved by the Capital Board.
- 5.3 The indicative costs of this work are summarised in the table below, including a considerable contingency budget to cover the risks raised by currently unknown elements and variable factors, which will be resolved in the coming weeks and months as decisions around the detail of the disposal of the Shire Hall site and the technical issues related to the move are resolved. The rationale for the contingency is detailed in **Appendix B** and the risks in **Appendix A**. It should be noted that these are indicative costs and will be refined through the next stages of work.

Capital expenditure	2019-	2020-21	2021-22	Total
(£000s)	2020	2020-21	2021-22	Total
IT	100	3126		3226
Staff time (internal)	200	488		688
Other Hired Contract				
Services	100	500		600
Contingency	0	650	244	894
Total Project budget	400	4764	244	5408

Table 5.1 Summary of capital costs

Revenue impact (£000s)	2020-21	2021-22	2022-23	2023-24	Total
Net revenue cost	£705,784	£705,784	£76	£76	£1,411,720

Table 5.1 Summary of revenue costs

5.4 The complexity of this work necessitates an iterative approach and requires a dedicated project team to work dynamically to achieve the required outcomes. Therefore, project

governance would be through a separate project board which would continue to feed into the Cambs 2020 & Capital Programme Boards. Any subsequent impact upon partner organisations will be dealt with through this project governance structure. The Chairman of GPC will receive periodic updates to ensure there is oversight of the work as it develops and any short/longer term revenue options would be signed off by the Section 151 Officer.

5.5 The costs above are significant but as noted in 1.3 running (and therefore retaining) the data centre also comes with both revenue and capital costs. This option effectively brings forward investment that would have been required anyway to maintain the data centre in its current location whilst supporting the overall move to cloud and sharing with PCC.

6. IMPACT ASSESSMENT AND RISK

- 6.1 A move of the CCC data centre from the Shire Hall site in 2020 will have a significant operational, financial and strategic impact upon the Council; this needs to be considered as part of any decision making related to the sale of Shire Hall. This section identifies the consequences on CCC and LGSS provided services of the sale of the Shire Hall Data Centre.
- 6.2 The areas that need to be addressed that are associated with a 2020 deadline comprise:
 - The technical move of multiple complex and interdependent systems within a short timeframe with the potential high risk of numerous system failures.
 - The operational risk that business-as-usual support and the implementation of business critical IT projects will be affected or delayed by IT analysts being redeployed to work on a data centre move.
 - The reimbursement costs associated with moving partner organisations' data and systems before the expiration of their current agreements with CCC (see list below).
 - LGSS (e.g. ERP Gold)
 - o LGSS Law
 - Milton Keynes Council
 - Education ICT Service
 - o NCC
 - o 3C ICT
 - The potential that the Council's strategic transformation of digital services could be delayed.

6.3 Business Impact

- 6.4 Putting aside the technical considerations, the move of the data centre will add to the multiple, concurrent business and system changes taking place over the next two years; these include:
 - The physical moves of staff from Shire Hall (relocation of staff, equipment, desktop hardware)
 - Any consequent changes in how staff and teams work and in some cases, how services are delivered.
 - The move to O365 which will require additional skills and therefore training for the workforce.

- Children's services adapting to the new Liquid Logic system.
- The continued sharing of services with PCC which require different ways of working.

All the above will be within the same timeframe as a data centre move, when there is a higher than normal risk of IT services becoming unavailable.

6.5 Technical Impact

- 6.6 The move of the data centre by 2020 will have a significant impact upon existing IT services and ongoing and planned business critical IT projects. It is vital that all this work is not competing for the same resources. These projects (currently) comprise:
 - Office 365 rollout
 - Liquid Logic implementation
 - PCC cross-working
 - EastNet migration
 - The technical support for the Cambs 2020 project including Shire Hall move of staff/equipment

6.7 Risks

- 6.8 All of the options that have been considered for a move of the Shire Hall Data Centre will have a cost implication and each will carry identifiable technical risks. However, our systems are large, complex and highly integrated, and it is not possible at this stage to predict all the potential consequences of moving them. Therefore, a change of approach may be required, should an issue become insurmountable.
- 6.9 There is a high risk that multiple elements of our data services could fail concurrently as a result of the move. The process of identifying where failures have occurred would be significantly impeded by many interdependent systems being moved at the same time. Whilst relocation is in progress, DR systems may not be immediately available, reducing the ability to restore systems quickly. A technical change freeze will need to be in place which spans relocation; if this is not agreed by all parties this could further result in technical issues and lack of availability.
- 6.10 These risks can be mitigated by employing the relevant expertise required to support the move, ensuring that any technical solutions procured contain the sufficient level of detail and by maximising any opportunity to extend the timescale for departure from the Shire Hall data centre. In order to ensure the feasibility and affordability of any structural changes at Sand Martin House, early quotations will be sought.
- 6.11 Other areas of risk include the possibility that an approach for dealing with hosted services cannot be mutually agreed with partners and that partners may not be able to allocate staff resources. To mitigate these risks it is vital that there is full engagement with partners through the project team and through governance.

Specific risks are listed at Appendix A.

6.12 **Opportunities**

6.13 Whilst the DC move is complex and presents many risks, it also facilitates the disposal of the Shire Hall site, thus enabling the longer term sustainability of the Council. If undertaken correctly, the move presents opportunities by strengthening the partnership with Peterborough City Council and allowing much more efficient use of valuable technical resources and greater resilience of services.

7. ALIGNMENT WITH CORPORATE PRIORITIES

7.1 A good quality of life for everyone

- 7.2 The following bullet points set out details of implications identified by officers:
 - Frontline services will inevitably be impacted by any extended downtime of IT systems, every effort will be made to mitigate any effect of the move on the delivery of services to the citizens of Cambridgeshire.

7.3 Thriving places for people to live

- 7.4 The following bullet points set out details of implications identified by officers:
 - Frontline services will inevitably be impacted by any extended downtime of IT systems, every effort will be made to mitigate any effect of the move on the delivery of services to the citizens of Cambridgeshire.

7.5 The best start for Cambridgeshire's children

- 7.6 The following bullet points set out details of implications identified by officers:
- 7.7 The move of the Shire Hall data centre services will require significant resource. This is why the request for investment includes dedicated resource to support the data centre move to ensure staff have the ability to continue to support critical services and projects such as:
 - Children's and Adult Services social care systems.
 - The implementation of the new, cross-organisational Children's social care system, LiquidLogic.

8. SIGNIFICANT IMPLICATIONS

8.1 **Resource Implications**

- 8.2 The following bullet points set out details of significant implications identified by officers:
 - The proposal outlined in this report responds to the requirement for the Shire Hall data centre to be vacated in line with the disposal of Shire Hall whilst maintaining the

availability and integrity of the Council's core data which is vital to delivery of services. The proposal adopts industry best practice as its starting position.

• The costs detailed in Section 5 include the staff resource implications of the proposal for which additional funding is being requested.

8.3 Procurement/Contractual/Council Contract Procedure Rules Implications

8.4 The suggested approach will require the procurement of a number of items including software, hardware and professional services. The Council Contract Procedure Rules and Public Contract Regulations 2014 will be adhered to in all instances.

8.5 Statutory, Legal and Risk Implications

- 8.6 The following bullet points set out details of significant implications identified by officers:
 - The relocation of large volumes of valuable data and equipment inevitably carries a high level of risk to service delivery and to the Council's reputation. Therefore risk mitigation will be paramount to reduce the likelihood of any impact on the provision of services and reporting but also on other time sensitive areas such as responses to subject access and Freedom of Information requests within statutory timescales. All require timely access to systems and for data to have a high level of integrity.
 - The Impact Assessment (Section 6) details the hosting arrangements which are currently in place with partner organisations and which would be impacted by the proposal. These arrangements include a legal contract with 3Cs Shared Services and Partnership Delegation Agreements with LGSS partners.

8.7 Equality and Diversity Implications

There are no significant implications within this category.

8.8 Engagement and Communications Implications

The relocation of large volumes of valuable data and equipment carries a high level of risk to communication systems both internally to employees and externally to citizens. Systems potentially affected include email, the Council's internal and public facing web presence and the telephony system.

8.9 Localism and Local Member Involvement

There are no significant implications within this category.

8.10 Public Health Implications

There are no significant implications within this category.

Implications	Officer Clearance	
•		
Have the resource implications been cleared by Finance?	Yes Name of Financial Officer: Chris Malyon	
Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by the LGSS Head of Procurement?	Yes Name of Procurement Officer: Gus de Silv	
Has the impact on statutory, legal and risk implications been cleared by the Council's Monitoring Officer or LGSS Law?	Yes Name of Legal Officer: Fiona McMillan	
Have the equality and diversity implications been cleared by your Service Contact?	Not applicable	
Have any engagement and communication implications been cleared by Communications?	Yes Name of Officer: Christine Birchall	
Have any localism and Local Member involvement issues been cleared by your Service Contact?	Not applicable	
Have any Public Health implications been cleared by Public Health	Not applicable	

Source Documents	Location
Documents relating to the sale/disposal of the Shire Hall site	https://cambridgeshire.c mis.uk.com/ccc_live/Co
Council – 15 May 2018 and 14 May 2019	<u>mmittees/tabid/62/ctl/Vi</u> <u>ewCMIS_CommitteeDet</u> <u>ails/mid/381/id/20/Defau</u> <u>lt.aspx</u>

Appendix A Summary of Risks

1. One of more of the external organisations with services hosted in the Shire Hall data centre will not agree to the approach that has been proposed and will require either an alternative technical approach or a financial alternative.

Mitigation: Engagement with partners through project team and governance

2. PCC may not allow the structural and technical changes to the data centre in Sand Martin House necessary for this approach to succeed or there might be issues with the lease that PCC have on Sand Martin House.

Mitigation: Initial engagement with officers and assurance regarding the lease.

3. The structural changes at Sand Martin House may be too expensive, structurally or technically not feasible.

Mitigation: Early quotations requested

4. The next stages of work may identify technical issues which necessitate a change of approach.

Mitigation: Previous analysis and recent cloud readiness assessment

5. The Disaster Recovery systems, or the place they are hosted, may not be available during relocation.

Mitigation: tbc through the project process

6. The change freeze is not agreed and either new systems need to be implemented or changes to existing systems are required prior to or during the relocation - causing technical issues and potential lack of availability.

Mitigation: Strong support for change freeze from senior management

7. Other organisations are not able to allocate people to this project.

Mitigation: Engagement with partners through project team and governance

8. There may be unforeseen and unavoidable delays in moving the IT systems from the data centre and no scope to delay the sale/disposal of the building leading to a critical point and potential impact on services.

Mitigation: Allocation of sufficient revenue budget to move CCC systems and data to Cloud (Infrastructure as a Service) should this be required.

Appendix B Summary of rationale for contingency within Section 5

Contingency – this is significant so it is available to be drawn down if any of the issues identified below occur.

- 1. Quotes As the proposed approach and associated funding for this work has yet to be approved by GPC the planning is at an early stage with quotes being indicative only.
- 2. Partners There has not yet been formal engagement with the other organisations impacted by the disposal of the Shire Hall data centre and therefore involved in the project, (to commence after GPC 28th May). The intention is to set up a project team including representatives from those organisations to ensure collaboration and align decision making, until this is done it is not possible to predict reactions in key areas. Some of these organisations are part of LGSS and the LGSS review process and subsequent implementation will need to be taken into account in the data centre move decision making process.
- 3. Northamptonshire County Council The move to replace NCC with two unitaries is an additional area of complexity around decision making. Currently the Disaster Recovery systems for CCC are hosted from the Northamptonshire Data Centre (Angel Street). It is a fundamental part of the approach to this work that those Disaster Recovery systems are available during the actual relocation of equipment from one location to another to ensure as little impact on service availability as possible. It is possible that NCC may sell their data centre or take some other decision that makes this approach unfeasible.
- 4. Disaster Recovery LGSS Law is a separate legal entity but the IT Services it uses are wholly part of the Cambridgeshire County Council infrastructure including email, file storage and most critically their case management system (DPS). There is no Disaster Recovery for this system so alternative arrangements will need to be made so it will be available during the move of services.
- 5. Realistically as a significant amount of the decision making is outside the direct control of the accountable officers within CCC the ability to predict & control associated costs is low. This is why partnership governance is a critical part of the implementation.
- 6. Additionally although an assessment of work was done in 2017 which produced some detailed costing, this needs to be revisited to ensure these are accurate and there is significant scope for change in terms of deliverables and cost.
- 7. There may be unforeseen and unavoidable delays in moving the IT systems from the data centre and no scope to delay the sale/disposal of the building leading to a critical point and potential impact on services.
- 8. Lastly the proposed approach is based on sharing of facilities with PCC which has yet to be formally agreed (post GPC).