

Regionalising Regulatory Services - Questions and Answers

Ref	Workstream	Authority	Source	Question	Answer
1	HR	Cardiff	Staff Portal	Will car loans be available?	Bridgend do not offer car loans. Cardiff and the Vale of Glamorgan do. Should an individual transfer from Cardiff and have an existing car loan they will be required to re-apply for the remaining balance of the car loan with the Vale of Glamorgan Council. The vale will then 'pay off' the outstanding balance with Cardiff and the individual will have deductions taken from their monthly pay until the balance is fully paid. Following the transfer mileage will be paid at the relevant rate dependent on the Council terms and conditions that apply.
				Will there be a mileage allowance?	
2	HR	Cardiff	Staff Portal		
3	HR	Cardiff	Staff Portal	Financially, what is the difference between voluntary severance and redundancy? (Cardiff specific question)	Under Cardiff's current policy there isn't a difference financially between voluntary severance and redundancy. However statutory redundancy is significantly lower.
4	HR	Cardiff	Staff Portal	Are the proposed voluntary redundancy / redundancy packages final yet or is there room for the project team to re look at them?	It is proposed that any severance arrangements that take place before the transfer will be subject to the terms of the employee's current local authority. Post transfer arrangements for severance will be reviewed as part of the TUPE consultation process between November 2014 and March 2015.
5	Service	Cardiff	Staff Portal	How has the number of staff in each section been calculated?	Depending on a decision being made in October 2014 to progress the collaboration project and the appointment of a Chief Officer to lead the new service then new service job description will be produced. Staff will be also be asked for their input into these job descriptions and then both the job descriptions and the personal specifications will have to undergo job evaluation. There will be consultation with the Trade Union forum as to how the change management process will be progressed following the transfer of staff to the new service. Issues around ring fencing/matching/selection will be discussed and a protocol will be agreed within this forum.
6	Service	Cardiff	Staff Portal	What functions will they perform? In particular those in the Neighbourhood Team?	
7	HR	Cardiff	Staff Portal	When are JDs and pay scales going to be available?	
				Are certain posts going to be ring fenced?	
8	HR	Cardiff	Staff Portal		
9	Service	Cardiff	Staff Portal	Who will develop policies and procedures for the new team?	This will be the responsibility of the new Management Team, and will be built into the three year Business Plan.

10	Service	Cardiff	Staff Portal	<p>A number of the projects do not appear to be in the proposals: Financial Capability Guidance – teaching in schools & to support workers; Cold Calling Control Zones; Scams Hub; and Consumer protection for the vulnerable.</p> <p>While I recognise that there are two Education & Training posts (page 40 Appendix B) under the proposed Enterprise and Specialist Services team, the work that they appear to be going forward with is for Education, training and advice to businesses. In addition I have checked the breakdown of the principal functions in each service area (page 69 Appendix A) and the above projects are not included either.</p>	<p>This area of work is identified in paragraph 24 of the Cabinet report – Neighbourhood Services – ‘Activities relating to domestic premises or that have an impact on local communities.’</p> <p>Your understanding is correct but these two posts are separate from the projects you have stated above. The role of these posts will be to generate income with the business community, as part of the Enterprise and Specialist services section.</p> <p>The collaborative approach is intended to make services more resilient and customer focused and as indicated above the current proposal envisages the work highlighted above to be within the role of the Neighbourhood services team.</p>
12	Service	Cardiff	Staff Portal	<p>It was discussed in the staff workshops that it would be necessary to develop some kind of uniform to provide officers with an identity with a triservice name / logo. Has this been included in the marketing/branding cost?</p> <p>The report identifies a proposed reduction in transport cost – I wonder whether it is known that several teams within Cardiff Council utilise pool cars and as a result of the proposed increase for home working this may be unrealistic.</p>	<p>There is some detail on page 110 of the Akins report. Should the Councils agree to create the joint service a marketing strategy and promoting the identity of the service will begin. The ways in which this may be done, as the way you indicate above, will be considered at that point in time. There has been no specific costing undertaken as yet on how that allocated budget would be spent.</p> <p>The use of pool cars is recognised and integrating their use into the proposals for home working and mobile working will be a matter for the new management to develop in consultation with officers.</p> <p>The training proposed, as you indicate, provides an opportunity to use resources in a variety of ways to deliver the requirement for financial savings. It is our intention to use the collaborative approach to preserve specialist skills, but provide officers with the skills to deal with a wider range of regulatory risks. We will work with external stakeholders such as CIEH, FSA, etc. to ensure that the proposal considers their requirements and how we best meet those within a reduced budget provision.</p> <p>Under TUPE legislation only those carrying out the service at the time of transfer are counted as "in scope". Therefore, if an employee is not carrying out the service at the time they will not transfer. That is not to say that the new employer would not support the continuation of the secondment following transfer, but a new arrangement would need to be made with them. I would suggest that you meet with your link HR officer to discuss the detail and implications of this.</p>

13	Service	Cardiff	Staff Portal	I note the proposals to increase training for EHPs to increase knowledge and resilience etc. I wonder how this meets the requirements of CIEH competency arrangements?	
14	Service	Vale	Staff Portal	Do the support officers (14) on the new indicative structure still include the support to the management team that was indicated on the original Atkins report? If so has this been omitted on the amended structure in Appendix B. If this is not the case why and where does this support now sit?	Further savings have been required from the structure since the Atkins report was published. This has involved the reconsideration of the structure with a view to ensuring affordability. It is envisaged that support from the management team will come from the 14 support officers included in the proposed structure at Appendix B.
15	HR	Vale	Staff Portal	Depending on the answer, if the £8k is in addition to the normal redundancy or is instead of the normal redundancy how do I go about getting the figures in writing? Regarding Appendix B, page 19; Are these redundancy packages in addition to the normal redundancy that is a week's pay for every full year of service or instead of this pay? The table says assumptions but it isn't very clear. Also what is the rationale for these packages and how have these figures been reached as there is a large differential between the package for under 55s and over 55s?	The figures included at page 19 of Appendix B are estimates only of potential consensual and compulsory redundancy costs (based on current figures). It is expected that these figures will reduce as we seek to avoid, reduce and mitigate the need for such redundancies over the next 14 months – should a decision be taken to proceed with the project. The figures at Appendix B include estimates for redundancy payments – being the cost to the employer and not necessarily payments to the employee. The reason for the difference is that an employee who is made redundant at age 55 and above would be entitled to a redundancy payment plus immediate access to pension benefits. Payment of early pension benefits would need to be paid for by the employer (hence the additional costs). There would be no such costs for someone who is made redundant below 55 as they would not be entitled to access pension benefits. The details of redundancy payments terms will vary across the three different local authorities.
16	HR	Vale	Staff Portal	When would I need to submit an application for redundancy if I wish to be considered in February/ March 2015?	

17	HR	Vale	Staff Portal	<p>I am currently on secondment from my substantive post . I was recently informed that the secondment will be extended? How does this effect me?</p>	<p>Discussions in relation to the consideration of voluntary redundancy applications will commence with the trades unions once a decision has been made in October about whether the collaboration project should continue or not. It will be important, as indicated above to ensure that all avenues are explored for reducing the need for compulsory redundancies. That said all employees are able to access pension/redundancy figures on a confidential and without prejudice basis. It is suggested that this is either done through the line management route or directly through your relevant Personnel Officer.</p> <p>Under TUPE legislation only those carrying out the service at the time of transfer are counted as "in scope". Therefore, if an employee is not carrying out the service at the time they will not transfer. That is not to say that the new employer would not support the continuation of the secondment following transfer, but a new arrangement would need to be made with them. I would suggest that you meet with your link HR officer to discuss the detail and implications of this.</p>
18	Service	Cardiff	Staff Portal	<p>Out of Hours Noise service The report seems to suggest that private and common law nuisances are currently being dealt with and that there is a possibility to reduce the demand – this is incorrect as Cardiff only deal with complaints that there is a statutory duty for the authority to investigate.</p>	<p>The Target Operating Model will be subject to further revisions in light of the requirement to make further savings. The role of the Night Time Noise Service is understood and indeed reflects the challenges faced by some of the other disciplines. It is evident that there are considerable demands on the service at weekends. Your comment that a ‘properly structured pool of officers need to work at times when there is greatest demand’ is pertinent and the Target Operating Model will need to reflect this and also deliver the key core services. This will be considered by the Management Team is the proposal goes ahead.</p>
19	Service	Cardiff	Staff Portal	<p>The proposed flexible working will not be able to deliver an effective Pollution Service. Most noise issues happen at night, outside normal working hours and in order to resolve those issues officers will need to be available at those times.</p>	<p>The Target Operating Model will be refined in light of the requirement to make additional saving and the Management Team will take these issues into account if a decision is made to proceed. You have raised some valid concerns which need to be considered in light of the reduced provision available to deliver the services.</p>
20	Service	Cardiff	Staff Portal	<p>It is not clear where Air Quality would be delivered.</p>	
21	Service	Cardiff	Staff Portal	<p>There appears to be some discrepancy over the number of posts that will be reduced/ lost as a result of the project.</p>	<p>Appendix B of the documentation that has been provided presents the HR updated position from July 8 2014. The number of staff movements/redundancies have taken</p>

22	Service	Cardiff	Staff Portal	In section 4.3.5 on page 35 of the main Atkins report states 'The key benefits are realised from reduced employment costs and a reduction in travel costs. Given the potential for staff to be working in Cardiff, Bridgend and the Vale possibly all in one day depending then surely there is a potential risk that significant travel costs will be incurred.	place since Atkins undertook their work and the information provided in Appendix B is our current understanding of the updated HR position. This is that there are currently 204.67 FTE and under the proposed new structure this will reduce to 178.4 FTE.
23	Service	Cardiff	Staff Portal	Consideration on continued and expansion on the provision of pool cars and whether this is more economical over mileage costs should be considered.	Proposals around home working and mobile restructuring will be developed to take into account functions undertaken at each office and the likely transportation needs for officers to deliver the services. These issues will be developed further as the Target Operating Model is implemented and also takes into account public transport for those officers that may need to work from different locations.
24	Service	Cardiff	Staff Portal	Details on where teams will be based needs to be included in order to give staff an understanding as to where they could potentially be based in order to make any necessary travel arrangements.	If home working isn't feasible or achievable, provision will be made for officers to hot desk at any of the offices and this will be implemented into the mobile scheduling system.
25	Service	Cardiff	Staff Portal	Home working may not be practical for all staff due e.g. no dedicated room.	The highlighted sentence above has been sent to Cardiff's HR to clarify the point that you raise and it has been confirmed that the post is permanent.
26	Service	Cardiff	Staff Portal	Confusion on what elements of Environmental Protection will be included in the Enterprise & Specialist Services as detailed in the Atkins Report (App A).	The Atkins report has been amended which is stated in paragraph 25 of the Cabinet Report – 'The employment structure recommended by Atkins has been refined to meet current and future budgetary pressures while still maintaining the recommended model.
27	Service	Cardiff	Staff Portal	Not clear as to whether the 4 technical specialist officers identified in the structure are to deal with all elements of this or whether there is more specialist/ dedicated officers within the team.	The Heads of Regulatory Services from each of the Councils are content that the proposed structure retains an appropriate level of resilience to deliver the service.'

28	Service	Cardiff	Staff Portal	<p>Currently the contaminated land team undertake detailed searches on property/ land transactions in terms of providing information on historic land uses/ contamination risks. This element of work is only detailed in the individual authority assessments, and has not been detailed as part of the Specialist teams role (unless it is being grouped within the function of Contaminated Land itself). Further recent additions to the work load of the contaminated land team in Cardiff have also not been captured</p>	<p>Consequently the Target Operating Model will be further refined by the new management team should the proposal go ahead.</p> <p>The proposal aims to retain a resilient service across the 3 Councils. To achieve this goal, it requires us to maintain and develop specialist skills and at this stage the precise nature of the Target Operating Model is yet to be finally determined due to the ongoing changes required to deliver further savings. If a decision is given to proceed, the new Management Team will finalise the Target Operating Model as soon as we can and in line with the actions put forward by Atkins.</p> <p>The points that you raise are important and as you state they will be addressed if and when the project is given permission to proceed as part of the refinement of the Target Operating Model. This does need to be considered at the earliest opportunity and it will, if the decision is given to proceed.</p>
29	Service	Cardiff	Staff Portal	<p>Into which team does Water Quality actually fit in the proposed service? (This question and comment could also be applied to Air Quality, Contaminated Land, Env Permitting).</p>	<p>Since its publication, the Councils have had to refine the target operating model advocated by Atkins to meet the extra financial savings required. Consequently, the new management team would need to reassess the target operating model in light of the reduced resource available. At this stage, the project team would agree with your suggestion that the function is best placed within the Specialist Services team, but the final decision would rest with the new management team, should the proposal to collaborate be approved.</p>
31	HR	Vale	Staff Portal	<p>Given the fact that it will have been many years since most staff had to attend an interview, will interview preparation training be able to staff that want it?</p>	<p>All appropriate support will be given to employees as we commence the remodelling phase and that this will be set up in consultation with both staff and the trade unions. Support from all three Councils will be drawn on in providing such support.</p>

				<p>I'd like to know the future of the Pest Control Division and how we plan to operate?</p> <p>I suggest that the Pest Control Teams from merging councils meet to discuss the future of the running and service of the pest control division from those that know it best to discuss how things will be going forward. Do you think this is sensible?</p>	<p>There is a need to consider the future of the Pest Control Service in consultation with staff and other stakeholders at the earliest opportunity. This work though needs to be undertaken once collaboration has been agreed and a new management structure has been put in place. There are numerous considerations for this service more than that needed for many other service areas. A sound business case will need to be developed to consider the options available which could range from in-house delivery as in Cardiff and the Vale to outsourcing as in Bridgend.</p>
32	Service	Vale	Staff Portal		
				<p>Will Scrutiny Committee be able to properly scrutinise all the Atkins Report and associated papers together with the financial information within the 5/6 day time frame.</p>	<p>Members (of both Scrutiny Committees) have received the papers in accordance with the Council's normal (and statutory) procedures and timescales. It is important to reiterate that consideration of this matter under the scrutiny process is, in fact, additional to the formal staff consultation procedures which the Council is following. The outcome of that process will be covered in the report to Cabinet (as will any comments of the two Scrutiny Committees). Members are reminded that the lead committee is Corporate Resources.</p>
41	Project	Vale	Trade Union Scrutiny Questions		
				<p>Draft Vale Cabinet Report Para 6. When were staff and Unions adequately briefed? There has been silence over the last 7 months while information had to be sought through the F.O.I process.</p>	<p>Arrangements have, and will continue to be made to engage and consult staff in accordance with our contractual and legal requirements. This will continue to be managed through meetings with staff and the convening of a dedicated 'project specific' trade union forum with representation from each council and each trade union. It is accepted that there was a delay in the progression of the project between 28th November 2013 and 11th July 2014. This was due to a number of factors including the need to consider the implications of the Williams Review and the changing financial position within each authority.</p>
42	HR	Vale	Trade Union Scrutiny Questions		
				<p>Draft Vale Cabinet Report Para 28. There is little duplication as this is a front line service. Would the Scrutiny Committee not agree that if you had wanted to reduce duplication this should be done with backroom staff not front line public protection staff?</p>	<p>Paragraph 28 of the cabinet report refers to the Joint Committee model of governance. One of the benefits of this model is the reduction of duplication in management of the service as one Committee is responsible for the functions. "Back office" support services are subject to specific savings targets through the budgetary process.</p>
43	Service	Vale	Trade Union Scrutiny Questions		
				<p>Draft Vale Cabinet Report Para 50. The business case + projected costs of the regionalised service assumes an increase in income of £95,000 (2016 -17) and £190,000 (2017 -18 onwards). How were these figures derived? On what were they based?</p>	<p>The assumptions underpinning the increased income are listed on page 192 of the report.</p> <p>The estimates are based on the previous experience of the Atkins team from working with other local authorities. The figures are conservative and have been agreed as realistic with the Heads of Regulatory Services at Bridgend, Cardiff and Vale of Glamorgan.</p>
44	Finance	Vale	Trade Union Scrutiny Questions		

45	Finance	Vale	Trade Union Scrutiny Questions	Draft Vale Cabinet Report Para 53. Please quantify further indirect savings as well as direct savings?	Paragraph 53 relates to Cardiff Council. For Bridgend and Cardiff Councils there may be an opportunity to make savings from indirect costs such as support staff and premises as these costs may reduce when the shared service is operational. For the Vale of Glamorgan, there will be an increase in indirect costs associated with supporting a larger service as the host (employing) authority. The relevant paragraph for the Vale of Glamorgan is number 54.
46	HR	Vale	Trade Union Scrutiny Questions	Draft Vale Cabinet Report Para 62. Why would severance costs differ for staff from different services if we are entering a shared service? (Cardiff Council is more generous).	This is because there is not a common scheme across all Councils. Each Council has different schemes with different limits on the size of early retirement and redundancy payments.
47	HR	Vale	Trade Union Scrutiny Questions	Draft Vale Cabinet Report Para 74. Why is it a TUPE 'like' transfer and not a straight TUPE transfer?	There is not always legal certainty about whether a staff transfer falls within the provisions of TUPE. In order to remove such uncertainty in this case it is proposed to apply the general principles of TUPE.
48	HR	Vale	Trade Union Scrutiny Questions	Draft Vale Cabinet Report Para 79. When were staff consulted on the proposals as set out in this report?	The pre-decision engagement process started on 11th July and was originally scheduled to end on 22-8-14. Following discussion with trade unions this has now been extended for all Councils up to 5th September 2014.
49	Service	Vale	Trade Union Scrutiny Questions	Draft Vale Cabinet Report Para 81. Why is there a need for a net movement from professional to technical roles (with implications for grading levels + terms and conditions) as well as a reduction in staffing levels, a change in role/ working arrangements for staff? What is the justification and on what is it based?	The shared service offers an opportunity to revise the structure of the service in the three councils and ensure that appropriately qualified officers deal with appropriate levels of risk. Based on the analysis undertaken by Atkins, it has been determined that at present there are a number of roles where work is being undertaken by more senior officers than is required. The proposed structure and associated economies of scale offer the opportunity to revisit this.
50	Service	Vale	Trade Union Scrutiny Questions	Draft Vale Cabinet Report Para 83. If the aim where possible is to assimilate staff into positions congruent with their existing status and grade why is it necessary for a net movement from professional to technical roles?	The shared service offers an opportunity to revise the structure of the service in the three councils and ensure that appropriately qualified officers deal with appropriate levels of risk. Based on the analysis undertaken by Atkins, it has been determined that at present there are a number of roles where work is being undertaken by more senior officers than is required. The proposed structure and associated economies of scale offer the opportunity to revisit this.
51	Project	Vale	Trade Union Scrutiny Questions	Draft Vale Cabinet Report Para 95. To avoid further conflicts of interest and to independently review these proposals could the Scrutiny Committee not consider recommending the employment of an Independent Regulatory Services/ Public Health Expert? (i.e. Retired Head of Service type level not typical commercial consultants)	One of the reasons for engaging external consultancy was the independence that such resource can bring to proposals such as these. One of the Atkins' project team members was a chartered waste manager and environmental health practitioner who has 37 years of local government experience, 20 of which were spent as City Environmental Health Officer at Portsmouth City Council.

52	Governance	Vale	Trade Union Scrutiny Questions	Atkins Report Page 10, Point 4. Would this significant proposal for Collaboration and Change between The Vale of Glamorgan Council; Bridgend and Cardiff Regulatory Services be more thoroughly scrutinised by a Joint Committee within the scrutiny process of each Council rather than 6 different Scrutiny Committees?	<p>The councils are currently scrutinising the proposals to determine whether each should be part of the shared service. As such it would not be appropriate that a joint arrangement be in place at the current time.</p> <p>However, if approved by all three councils and following a process of establishing the service, consideration can be given to the options for scrutinising the service itself, as outlined in the draft Cabinet report.</p>
53	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 11, Point 11. Why is Atkins considering extension of Cardiff's Dog's Home to the other two authorities when Cardiff is paying considerably more for homing dogs (per dog per day) than Cardiff and Bridgend who use private kennels? Scrutiny Members need to ask to see the detailed financial figures on homing for stray dogs.	<p>A detailed review of the Dogs Home was not conducted within the scope of the review. The recommendation is that further consideration should be given to a model of service provision for all three councils. This should include a cost-benefit analysis of in-house provision (at the current facility and alternatives) and third-party provision.</p> <p>The Business Case assumes no change to the current provision of the Dogs Home service.</p> <p>Currently in the model the dogs home is a shared cost across the 3 services, but in reality we may need to differentiate core services from authority specific services, depending on how the dog's home is utilised, and allocate costs accordingly. All authorities have stray dog services, but clearly operate them differently. This will need to be reviewed to ensure a more consistent approach.</p>
54	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 12, Point 19. On what basis should the proportion of enforcement work carried out by Technical Officers with appropriate levels of competence be increased?	One of the aims of the project is to drive out savings wherever possible. Allocating work to appropriately graded officers is one such way of delivering these savings and the proposed structure takes into consideration the numbers of staff required to deliver the service within the constraints of the budget available.
55	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 12, Point 17. Yes they should consider standardising their fees and charges but have there been any moves in this direction?	<p>It is difficult to standardise charges if there is not a shared service.</p> <p>There has not been any standardisation to date due to the provision of different service levels in the three Councils with differing central costs, salaries etc. The standardising of fees may in some circumstances be desirable but may not be achieved in total due to each council's right to require additional or differing service levels.</p>

56	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 21, Point 3.3.3 Claims that the information gathered from the staff workshops was given extensive consideration and clearly informed the Target Operating Model, Business Case and Implementation Plan. The question arises as to why were a number of the major proposals such as the removal and demotion of EHO's and TSO'S to Consumer Service Officers and Consumer Service Technical Officers never mentioned at these staff workshops?	This question is not strictly within remit of the scrutiny committee; however arrangements have, and will continue to be made to engage and consult staff in accordance with our contractual and legal requirements. This will continue to be managed through meetings with staff and the convening of a dedicated 'project specific' trade union forum with representation from each council and each trade union.
57	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 75, Point 2.9.1 Dogs Home. Why is Atkins considering extension of Cardiff's Dog's Home to the other two authorities when Cardiff is paying considerably more for homing dogs (see page 113)Cardiff total costs £244,818 compared to Vale £49,926 and Bridgend £40,214?	The Atkins report is not proposing anything specific regarding the dogs home. This is another service area that needs to be considered as one service area and the most cost effective way of delivering statutory duties introduced at the earliest opportunity. The future may vary from a 'Council' run facility to a number of private establishments throughout the new region. The report is saying 'further consideration' is needed.
58	Service	Vale	Trade Union Scrutiny Questions	Dogs Home. Is it possible and should we be trying to replace employed staff with volunteers?	The Atkins report is not proposing anything specific regarding the dogs home. This is another service area that needs to be considered as one service area and the most cost effective way of delivering statutory duties introduced at the earliest opportunity. The future may vary from a 'Council' run facility to a number of private establishments throughout the new region. The report is saying 'further consideration' is needed.
59	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 76, Point 14 On what basis should there be outsourcing of the Pest Control Service jointly on behalf of Bridgend, Cardiff and the Vale of Glamorgan Councils? Do Scrutiny Members consider that this is in the best interests of the Public?	The recommendation from Atkins is that consideration should be given to the delivery of pest control in conjunction with Cardiff and the Vale in Bridgend when their contract is due for renewal. An alternative option to in house provision is to outsource. Any changes would need to be the subject of a business case which would include consideration of factors such as public interest.
60	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 78, Point 18. Scrutiny Committee Members need to ask on what basis should fees and charges be standardised across Cardiff and the Vale of Glamorgan? Should it be on the basis of maximising income generation (Cardiff Model) or public protection based on risk (i.e. Vale of Glamorgan charges for rats outside but not in the house).	This is an issue for each authority to determine. The proposals allow for standardisation where the councils agree to do so and allow for local decision making on key areas.
61	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 79, Point 5.1.1 Paragraph bottom of the page. Why does the Report make an issue of signposting residents who have issues that are private or common law nuisances toward remedies that they must pursue themselves when this is already undertaken by Noise Teams in all 3 Authorities?	In order to deliver the savings required from the service, consideration will have to be given as to how to concentrate on delivering statutory requirements where resources are not sufficient for discretionary areas. The redesign of processes, such as for noise complaints, to signpost customers to non-council services is an example of this.

62	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 81, Point 5.11.2 Commercial Services second paragraph at the bottom of the page. The Food Law Code of Practice (Legal Requirement) states that certain establishments should be inspected only by Environmental Health Officers or officers holding the Higher Certificate in Food Premises Inspection. Certain critical enforcement action can only be undertaken by Environmental Health Officers. If the intention is to train non-qualified officers up to the Higher Certificate Level which is expensive and time consuming, has this been costed?	The operating model has been designed to align the appropriate levels of resources to the appropriate levels of risk, for example the inspection of certain types of food premises. The number professional staff has been reduced but it is not the intention that all inspections are carried out by technical officers. The business case contains provision for training where this would be required.
63	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 82. Middle paragraph. Where is the evidence that Business Compliance Officers (BCO'S) can reduce the numbers of inspections required from professionally qualified officers? Which is cheaper for a BCO to provide basic advice or for basic advice to be provided by administrative staff / call centre staff/ technical officers/ sampling officers as happens at present?	This depends on the level of advice being given and in what environment. Actual duties for officers remaining in the structure will be considered as the core service is being finalised.
64	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 82. How will BCO'S reduce the burden on business (Government's Aim) when they refer on matters to professionally qualified staff because they do not have the competency to deal with these matters? Will two visits instead of one reduce the burdens on business?	The Business Compliance Officer posts have been removed from the structure in light of further savings being required from the structure.
65	HR	Vale	Trade Union Scrutiny Questions	Atkins Report Page 82. Between 28th Nov 2013 and 17th July 2014 when did meaningful engagement with trade unions and staff occur?	Arrangements have, and will continue to be made to engage and consult staff in accordance with our contractual and legal requirements. This will continue to be managed through meetings with staff and the convening of a dedicated 'project specific' trade union forum with representation from each council and each trade union. It is accepted that there was a delay in the progression of the project between 28th November 2013 and 11th July 2014. This was due to a number of factors including the need to consider the implications of the Williams Review and the changing financial position within each authority.

66	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 130. Proposed Model for Collaboration and Change (TOM) across 3 Councils proposes Commercial Services Team Leader (5) with Commercial Services Officer (24) and Commercial Services Technical Officer (35) and Business Compliance Officer (12). However in Appendix B the same updated model proposes Commercial Services Team Leader (4) with Commercial Services Officer (18) and Commercial Services Technical Officer (28). A massive reduction in staff numbers from 71 to 50 staff in one essential team. Why is there the need for such a drastic reduction in staff numbers within the life time of this report? What has happened to the Business Compliance Officers (BCO's)? Are they now no longer such a good idea?	Further savings have been required from the structure since the Atkins report was published. This has involved the reconsideration of the structure with a view to ensuring affordability. Members will be aware however that nine posts (6 Commercial Services Officers) and 3 Commercial Services Technical Officers) have been re-positioned in the Specialist Services Team.
67	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 130. Appendix F Shows the 3 Proposed Models for Collaboration and Change; Collaboration Only; Change Only for the 3 Authorities. However the latest updated Atkins Appendix B Page 40 Only gives an updated 'final' Proposed Model. We would like to ask the Scrutiny Committee if the decision about which model to follow has already been taken before any consultation?	The Atkins report and associated updated appendix provides a financial analysis of each of the options. As this analysis demonstrates the greatest potential to deliver savings exists with the collaborate and change model, this has been the subject of further revision in light of the changing circumstances within each council. The other options have been updated to reflect the current status of the establishments in each council, showing an updated level of savings that would be delivered if these models were adopted. As such, no change was required to the structures themselves. No decision has yet been taken on the model to be adopted. This will be the subject of the Cabinet and Full Council decisions.
68	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 131. Model for Collaboration Only across 3 Councils is given in terms of posts/structure. What would the position be for this model in terms of posts/ structure following the further budget reductions for 2014/15 financial year of approximately £1 million (i.e. should be in Appendix B)?	Pages 6 and 7 of Appendix B shows an updated financial appraisal of the different options since the savings for 2014/15 were made.
69	Service	Vale	Trade Union Scrutiny Questions	In the context of the above point if we would like to ask the Scrutiny Committee the question that if The Collaboration Only Model was followed would the Public Protection Department in the Vale of Glamorgan Council still be viable?	If collaborate only was the model adopted, annual savings would amount to £350k across the three local authorities. This level of savings is unlikely to be sufficient.
70	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 135-136. These pages give a good example of the redesign Food Inspection Work at Great Yarmouth Food Safety Service. However is the Scrutiny Committee aware of the level of engagement and consultation which went into this model from the staff as well as the management?	This question is not strictly within remit of the scrutiny committee; however arrangements have, and will continue to be made to engage and consult staff in accordance with our contractual and legal requirements. This will continue, as appropriate as part of the post transfer remodelling of the service and in line with lessons learnt from elsewhere.

71	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 146-170. Appendix H helpfully gives a Risk Matrix of Principle Areas of Regulation for Environmental Health; Trading Standards and Licensing. However it does mention the use of BCA's. Does the report mean Business Compliance Officers BCO's?	This should read BCO.
72	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 146 - 170. Appendix H helpfully gives a Risk Matrix of Principle Areas of Regulation for Environmental Health; Trading Standards and Licensing and Pages 178 – 192 Appendix K Option Financial Summaries and Assumptions. This data is all just based around cost savings. Was any information collected by Atkins on Best Practices adopted by Cardiff; Vale of Glamorgan or Bridgend which could be shared in the Collaboration and Change Model?	The work undertaken by Atkins, including the staff workshops, was used to formulate ideas and to provide an opportunity to share best practice. This is one of the major benefits of collaboration in that good practice can be shared for the benefit of all partners.
73	Service	Vale	Trade Union Scrutiny Questions	Atkins Report Page 171 - 176. Appendix I gives the Job Description for the Chief Officer, Regulatory Services and the JD and PS for the Service Manager regulatory Services. However why are the PS's and JD's for the following newly created posts not included :- Neighbourhood Services Officer ; Neighbourhood Services Technical Officer; Commercial Services Officer ; Commercial Services Technical Officer; Business Compliance Officer; Primary/ Home Authority Officer ; Specialist Investigations Officer; Business Development & Performance Support Officer; Improvement Officer etc. ?	Posts wouldn't be finalised until the Head of Service has been appointed within the new structure and as such no job descriptions and person specifications have been drafted at this time. These will be developed should the project proceed to the next, more detailed, stage and will be the subject of job evaluation and consultation with staff and the trade unions.
74	HR	Vale	Trade Union Scrutiny Questions	Atkins Report Page 203. Appendix N Grade and Cost Assumptions for Indicative New Structure. Why have all the Grades and Estimates for all 3 Authorities been blanked out when this report essentially deals with cost savings?	The appendix dealing with indicative salaries was redacted on the basis of concerns about data protection. It has been agreed that this decision will be reviewed and information shared where there are no remaining DPA concerns.
75	Training	Vale	Trade Union Scrutiny Questions	Supplement Page 21. EHO training for metrology. Trading Standards say that this is an intense and expensive course that usually costs around £2,000. A Trading Standards background prior to course enrolment is usually assumed. Where can it be provided for 17 Officers at £300 each?	The actual price of training can vary by content/provider/etc. Atkins took made an assumption that £300 per head would reasonably cover the provision of all the required training and included in the business case.
76	Training	Vale	Trade Union Scrutiny Questions	Supplement Page 21. Training for 12 Business Compliance Officers is now £0. (was £300 each) Are we to assume that BCO's have now been dropped if so why?	When considering the proposed structure in light of the budget available, a decision was made to remove these posts in order to deliver the further savings required. As such, there is no longer a training cost associated.

77	Training	Vale	Trade Union Scrutiny Questions	Supplement Page 21. TSO training for Health and Safety. To achieve a level of health and safety training to enforcement standard level cannot be achieved in a brief time and is not cheap. Where can it be obtained for £300 for 7 officers?	The actual price of training can vary by content/provider/etc. Atkins made an assumption that £300 per head would reasonably cover the provision of all the required training and included in the business case.
78	Training	Vale	Trade Union Scrutiny Questions	Supplement Page 21. Why is all the training mentioned regardless of what it covers listed at the same price of £300?	The actual price of training can vary by content/provider/etc. Atkins made an assumption that £300 per head would reasonably cover the provision of all the required training and included in the business case.
79	HR	Vale	Trade Union Scrutiny Questions	Supplement Page 22. Gives an assumption of total savings from Consensual Terminations as 21 fte with 3 fte over 55 and 18fte under 55. How can this data be given when most of the age profile data on page 5 under Equality Impact Assessment is missing?	This indicative figures as set out in the supplement were based on the known age profile within the Vale (albeit that this was not included in the EIA)
80	HR	Vale	Trade Union Scrutiny Questions	Supplement Page 22. The total number of Consensual Terminations and Compulsory Redundancies in Appendix B has increased to 34fte compared to 29fte (Page 190 previous Atkins report). Assumed redundancies have thus jumped by a further 17% within a year of the previous report, would it be correct to assume they will increase even further on implementation?	Based on staffing levels at July 2014 the number of potential redundancies would be approximately 26 FTE. It is expected that this figure will further reduce on implementation of the new service model as a result of the continuing approach to vacancy management Further savings will however be necessary following the implementation of the new service.
81	HR	Vale	Trade Union Scrutiny Questions	Supplement Page 22. In addition to the loss of the posts above when the vacant posts and temporary employment posts are included is it correct to state that 71 posts will go by April 2015?	See above. The vacancy management approach has been followed in order to mitigate current financial pressures within each authority. This will continue to support ongoing savings within each authority and to reduce the level of potential redundancies (as above).The implementation of the new remodelling service is proposed to be September 2015 and not April 2015.
82	HR	Vale	Trade Union Scrutiny Questions	Supplement Page 33. Appendix M – Vale of Glamorgan Current Establishment List 2014/15 gives a total of 52 fte presently employed. If the equivalent of 71 posts are to go by April 2015 (Page 22) would it be right to assume therefore that these cuts within this collaborative project are the equivalent to the wholesale removal of the Vale of Glamorgan Regulatory Services from the new Shared Regulatory Service between the 3 Authorities?	The need to reduce post numbers through vacancy management has been necessary as a result of current financial pressures regardless of the current collaborative proposals. (see above). This will continue to be the case. The new service model will, however help to provide a more resilient service going forward whilst accommodating the above reduction of staffing levels.
83	HR	Vale	Trade Union Scrutiny Questions	Supplement Page 36-39. Appendix N – Salary Comparison. Why has it been blanked out when this report essentially deals with cost savings?	The appendix dealing with indicative salaries was redacted on the basis of concerns about data protection. It has been agreed that this decision will be reviewed and information shared where there are no remaining DPA concerns.

84	HR	Vale	Trade Union Scrutiny Questions	Supplement Page 40. Collaboration and Change Option Final Draft. What are the retention and recruitment implications to this proposed Shared Regulatory Service? Have they been considered?	The proposals seek to offer improved staff retention and development opportunities in what would be a flagship collaborative service, operating across the region.
85	Service	Vale	Trade Union Scrutiny Questions	Supplement Page 40. Collaboration & Change Option Final Draft. This operating model is less identifiable as a Regulatory Service than is currently the case as for many years the public have been familiar with dealing with Environmental Health Officers (EHO) and Trading Standards Officers(TSO).Will the creation of the new post/ titles Neighbourhood Technical Officer and Commercial Services Technical Officer etc. be confusing to the public and businesses ?	Communicating with the public and other customers will continue to be very important to ensure that there is understanding of the services and requirements of the local authorities. It is not considered to be an issue that some roles would have different titles.
86	Service	Vale	Trade Union Scrutiny Questions	Supplement Page 40. Collaboration & Change Option Final Draft. Identifies 168 posts in the proposed structure. This compares with 193 posts in the proposed Collaboration and Change Model a year ago (Page 130 of Atkins Report) and 280 staff that were employed in September 2013 (Page 16 of Atkins Report).This is a massive proposed reduction in posts (40%)from 280 to 168. The key question therefore is the Scrutiny Committee completely satisfied that this proposed Shared Regulatory Service will be fit for purpose to deliver Environmental Health ; Trading Standards and Licensing efficiently and effectively across 3 Authorities Bridgend ; Vale of Glamorgan ; Cardiff with a combined population of 622,000 ?	See questions 6 and 7 above. The potential reduction in posts in the proposed new structure is explained in earlier questions. This represents a gap of approximately 26 posts between the current establishment (excluding vacancies and temporarily filled posts). The FTE numbers in April 2013 were 258.78 and not 280. The rationale for the vacancy management approach is explained above.
87	Service	Vale	Trade Union Scrutiny Questions	Supplement Page 40. If the proposed Shared Regulatory Service failed who would be held accountable?	This will be one of the issues covered in the Working Joint Agreement between the three councils and is described in further detail in paragraph 90 of the draft Vale Cabinet report.
88	Service	Vale	Trade Union Scrutiny Questions	What is the breakdown of the teams and what will each team be responsible for. Are there going to be varying job descriptions between the various teams?	The reports set out the target operating model for the proposed shared service. Further work will be undertaken during implementation, led by the Chief Officer, to define individual roles and responsibilities and how these interrelate across the structure.
89	Service	Vale	Trade Union Scrutiny Questions	What is the breakdown in Commercial Services between the four teams. P69 of the Atkins report gives an overview of what each service area will cover but yet this is not mirrored in the new structure on p40 Appendix B. I.e. animal health to sir [sic] in commercial services but yet on the structure it sits in specialist services.	The structure has been revisited to reflect the changing circumstances in each council to ensure affordability. Further detailed work will be progressed in accordance with the overall framework of the operating model once a decision to proceed with the project has been taken and in consultation with staff and the trade unions.

90	Service	Vale	Trade Union Scrutiny Questions	The specialist investigations team sits very remotely from the rest of the Trading Standards function – currently these roles are undertaken by staff embedded in the current Trading Standards function. There seems to be no real explanation as to what they will do and why they sit so remotely from other Trading Standards roles.	It is envisaged that this team would investigate a range of offences that would embrace all of the three disciplines – Trading Standards, Environmental Health and Licensing.
91	Service	Vale	Trade Union Scrutiny	Proposed Governnace and Structure. What will the proposed Shared Regulatory Service be called?	No decision has yet been made regarding the name of the proposed shared service.
92	Project	Vale	Trade Union Scrutiny Questions	The timescales to digest this information for both staff and scrutiny committee is worrying.	Members (of both Scrutiny Committees) have received the papers in accordance with the Council's normal (and statutory) procedures and timescales. It is important to reiterate that consideration of this matter under the scrutiny process is, in fact, additional to the formal staff consultation procedures which the Council is following. The outcome of that process will be covered in the report to Cabinet (as will any comments of the two Scrutiny Committees). Members are reminded that the lead committee is Corporate Resources. Staff briefing and engagement events are planned to take place during the summer and will inform the development of the cabinet report, prior to this being considered by Cabinet and Full Council.
93	Service	Vale	Trade Union Scrutiny Questions	The general loss of identity for both professions – the public/businesses identify with EH/TS functions and understand them. The creation of new functions are likely to confuse and the general public will be unsure as to where they need to go. This seems to contradict national campaigns etc.	Communicating with the public and other customers will continue to be very important to ensure that there is understanding of the services and requirements of the local authorities. It is not considered to be an issue that some roles would have different titles.
94	Service	Vale	Trade Union Scrutiny Questions	Feed falls within Commercial services team yet the inspections are normally undertaken by animal health who are in separate team.	In terms of the detailed structure, consultation with staff will take place following any decision to proceed and once the Chief Officer is appointed who will then be responsible for the detailed working up of the target operating model which will be described in the service's three year business plan.
95	Service	Vale	Trade Union Scrutiny Questions	Animal licensing still under licensing team but if you have specialist team re welfare, dogs, pests then animal licensing should fall within that team.	Due to the level of savings required, consideration has been given to how to ensure cross-skilling wherever possible as the number of specialist posts that can be viable in the future diminishes.
96	HR	Vale	Non-Union Staff Scrutiny Questions	As the proposed structure will significantly reduce the number of professional officer compared to those currently employed would professional officer be required or have no alternative other than redundancy to accept technical officer positions ?	The figure of 26 (in terms of FTE reductions) represents the overall reduction in posts (from 204 to 178). Some of the posts will be similar in role and function to the current structure but many will be new. It is anticipated that in many cases staff will have the opportunity to be considered for "like-graded" roles. It is true however that for a number of staff there may be a need to consider a lower graded job as an alternative to redundancy.

97	Service	Vale	Non-Union Staff Scrutiny Questions	The report mentioned that technical staff with appropriate qualifications can undertake higher risk inspection. How would an appropriately qualified officer be determined or defined?	It is likely that many of the Technical Officers posts are likely to be filled by EHO's/TSO's who are unsuccessful in obtaining a higher post. As they are likely to come from the a specific service area they would also already have sufficient competency to undertake the roles on offer. As the model is worked though and service plans developed we will have a more detailed idea of the exact resources required to continue to deliver the service, there is already a significant amount of work that technical officers can carry out. Without pre-determining the structure once officers are in post we will also have to establish where there may or may not be gaps in skills or knowledge and look to address these appropriately.
104	HR	Vale	Staff Briefing Questions	Why are the salaries redacted in the report?	The appendix dealing with indicative salaries was redacted on the basis of concerns about data protection. It has been agreed that this decision will be reviewed and information shared where there are no remaining DPA concerns.
105	HR	Vale	Staff Briefing Questions	Why haven't the Job Descriptions been drafted for all staff?	Should the project proceed, Job Descriptions will be created shortly after the appointment of the Head of Service. Work will commence on drafting the detailed job descriptions and person specifications once a decision has been made about the project in September/October. The work will be done in consultation with staff.
106	Project	Vale	Staff Briefing	What happens if the savings expected are not delivered?	Atkins have raised this as a risk and all possible mitigations will be put in place to ensure that the expected savings are realised.
107	Project	Vale	Staff Briefing Questions	Was the Bridgend/Vale Audit collaboration successful?	Bridgend and the Vale of Glamorgan Councils have created a shared service for internal audit. The project had several desired benefits; resilience, access to specialist resource and financial savings. The project has realised all of these benefits, including the estimated financial savings.
108	Project	Vale	Staff Briefing Questions	Has the Worcestershire collaboration been successful?	Reuben has not spoken directly to the Worcestershire Council regarding this, but the Project Team have. The model has worked well for that collaborative service.
109	Service	Vale	Staff Briefing Questions	As Cardiff have the larger population, will the majority of the focus be on Cardiff's residence?	Office location will be dispersed across the three authorities and a 'Core Plus' model, where by each of the three authorities can purchase an increased level of service.
110	Service	Vale	Staff	How many offices could staff work from?	This detail will be analysed should the project progress.
111	Service	Vale	Staff Briefing Questions	There is a shift from Professional staff to Technical; leading to concerns that this may lead to service delivery being negatively impacted.	A risk management approach (as suggested by Atkins) will be adopted.

112	HR	Vale	Staff Briefing Questions	How do you intend on lowering the 24 FTE within the next 14 months?	This will be considered through the Trade Union Forum. Consultation with the Trade Unions will include exploring all ways of mitigating or avoiding the need for compulsory redundancies. This will include a robust approach to vacancy management, consideration of applications for voluntary severance and a transparent approach to assimilation and selection.
113	ICT	Vale	Staff Briefing Questions	Have the ICT costs been worked out in detail? Is £400k enough as previous mobile working projects staff have been involved with have failed and cost a lot.	An ICT work stream has been in place for a while and have helped Atkins with their projected costs.
114	Service	Vale	Staff Briefing	Has a reduction the in level of services (or services completely) been considered?	The Council's Medium Term Financial Plan will be available in August, which will have considered what services are to be provided.
115	HR	Vale	Staff Briefing Questions	There are four key questions staff want to know: 1. Where in the structure would I fit? 2. When will this happen? 3. What will my job be? 4. How much will I be paid?	If the collaboration exercise progresses then it is planned that the remodelling phase (i.e. movement to the new operating model) will commence from May 2015 and be completed by September 2015. The management of this process (in terms of selection to the new roles) will be subject to consultation with trade unions and staff. The grades of posts will be determined following an job evaluation exercise managed by the host employer.
116	Service	Vale	Staff Briefing	If one of three Council's decide against the project, will the other two still collaborate?	This has not been considered, and won't be unless the project does not proceed.
117	HR	Vale	Staff Briefing Questions	Will the Vale staff keep the same T&Cs or move to the 'Regulatory service' T&Cs?	If the Vale is the host employer then current Vale employees will not be subject to a TUPE transfer and will be subject to the core terms and conditions of that Council. Particular working arrangements may need to be modified to meet the need of the new service. All employees (whether from Cardiff, Bridgend or the Vale will be affected by the remodelling process following the transfer process in April 2015.
118	HR	Vale	Staff Briefing	Will the Head of Service post be advertised or an appointment?	It is envisaged that the post will be subject to appointment through ring fencing arrangements.
119	HR	Vale	Staff Briefing Questions	Will Cardiff staff come across on 36 hours?	A stock take of terms and conditions will be undertaken as part of the TUPE consultation process. Working arrangements in the proposed structure will need to be reviewed to meet service needs and will be subject to consultation.

120	HR	Vale	Staff Briefing Questions	What will the selection process consist of?	This process has not been detailed, and will only be detailed should the project progress. The project will consult with the Trade Union Forum to ensure that the most appropriate process is put in place. It will, however be based on sound and transparent principles to be agreed with the trade unions. For some employees this may include "job matching" i.e. appointment to a similar post and for others it may include a competitive selection process. All posts will be ring-fenced to existing staff. Staff will be supported through the process
123	Service	Vale	Non-Union Staff Scrutiny	Would Commercial Services Officer and Neighbourhood Services Officer be required to 'supervise' the technical officer positions ?	No, supervision and management are the roles to be conducted by the Team Leaders.
190	Project	Vale	Staff Portal	I am aware that audit have collaborated with Bridgend and would be grateful to know whether the savings that were predicted have been achieved.	Bridgend and the Vale of Glamorgan Councils have created a shared service for internal audit. The project had several desired benefits; resilience, access to specialist resource and financial savings. The project has realised all of these benefits, including the estimated financial savings.
191	HR	Vale	Staff Portal	Why is it only 1 yr protection when in previous reorganisation there has been at least 3 yrs protection of salary?	The Vale of Glamorgan's policy in relation to salary protection refers only to 1 years' service (see section 8 of the Council's Avoiding Redundancy Policy).
192	Service	Vale	Staff Portal	Has it been taken into consideration regarding management savings that some managers may not be just managing public protection staff and therefore there may not be a 100% saving on that salary.	Yes this has been taken into account.
193	HR	Vale	Staff Portal	There has been no talk about redundancy packages available in the vale but are aware Cardiff are offering them.	Consideration of voluntary severance (and the merits of individual applications) can only be given once we know whether the project is proceeding and subject to any pertinent legal considerations. The unions and the project team are, however keen to be able to agree a common sense position on this (subject to any legal considerations and supported by an appropriate business case). In relation to voluntary severance in general (not relating to the collaboration project) employees should follow their current employers normal processes.

194	Service	Cardiff	Staff Portal	Why is there no mention of the projects on page 69 Appendix A that explain the principle functions of each service area? The function that could possibly be attributed to these projects is under the Neighbourhood Services banner is Community Safety Partnership. In addition these projects are not mentioned or alluded to on page 79 or 80 (Appendix A) that explains the “key human resource and structural implications” of the Neighbourhood Services Team. I have a real concern that the work we currently do in Cardiff with the most vulnerable in society may be lost if they are not highlighted in the report. Especially as you have stated the collaborative approach is intended to make services more resilient and customer focused.	The projects and general functions around safeguarding that you mention in your earlier mail were discussed in the staff workshops and their omission from the list at page 69 is an oversight; however the Atkins Report cannot be edited any further at this stage. You have raised some valid concerns which need to be considered in light of the reduced provision available to deliver the services. At this stage, the project team would agree with your assertions about the importance of the work undertaken to protect vulnerable people and suggest that the function is best placed within the Neighbourhood services team. The final decision would rest with the new management team, should the proposal to collaborate be approved and your comments will be taken into account.
195	HR	Cardiff	Staff Portal	My current secondment runs until 31st March. Would I be able to apply for jobs under this collaboration or would they be ring fenced to full time permanent staff first?	To be included in the transfer process, staff need to be undertaking the activities of the service area. therefore any staff on secondment need to meet with their Human Resources Officer to ensure the necessary arrangements are in place to support them through the process.
196	Service	Cardiff	Staff Portal	Concern that statutory functions have not been prioritised and will not be potentially delivered	The concern is noted and the project team are unsure why that perception exists. The model is intended to provide as comprehensive a service as possible within the resource available
197	Service	Cardiff	Staff Portal	Number of managers not workable – possible risk in relation to management of food poisoning outbreaks and credibility of the national food hygiene rating scheme	The numbers of managers does reduce in the proposed model, but the model is intended to provide as comprehensive service as possible within the resource available. An increase in the number of managers would see a corresponding decrease in the number of officers undertaking operational duties, there will only be a fixed budget
198	Project	Cardiff	Staff Portal	Has there been consultation with stakeholders / customers?	Consultation with external stakeholders is taking place and organisations such as the FSA, South Wales Police and Welsh Government are being consulted on the proposal to change, alongside others that have been raised with me through this consultation process
199	Service	Cardiff	Staff Portal	It is felt that this proposal is not providing additional resilience in Cardiff and how this is achieved could be better explained in the documentation	Your observations are noted and in the current financial climate where there is a need to make unprecedented levels of savings, achieving additional resilience is unlikely. The proposed model aims to make the service as resilient as possible within those financial constraints

200	Service	Cardiff	Staff Portal	There is a need for more than one specialist lead officer in the communicable disease field across 3 authorities	The financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff and measures may need to be considered that could result in a significant change in service delivery.
201	Service	Cardiff	Staff Portal	The model as seen without a great deal of detail, looks as if inspection will be undertaken in premises that are not due for inspection. This approach is contrary to the national enforcement guidance for health and safety	This concern is noted and as indicated earlier if a decision is made to proceed, the appointed Management Team will need to consider the issues and concerns in light of the reduced provision available to deliver the services. The model is intended to provide as comprehensive a service as possible within the resource available. There will be a clear focus upon risk assessment practices for inspection programmes and the use of best practice, where possible, for all activities. The new service will not undertake inspection activities if they are not required.
202	Service	Cardiff	Staff Portal	Concern that the nature of the challenge in Cardiff has not been recognised as being significantly different to the challenges in the Vale and Bridgend. In particular this difference - is the business turn over rate and the challenges we have with language difficulties, also the quantity and range of businesses, being on a different scale	This concern is noted and will be considered by the new management team as a key issue to resolve, should a decision be made to pursue the collaborative approach.
203	Service	Cardiff	Staff Portal	There is a real pride in Cardiff's work / achievements currently and the arrangements / organisational structure in place has facilitated this through allowing officers to develop specialisms and therefore to become experts in their field. The model (as seen) proposes a generalist approach which is believed to be more inefficient and leading to lower quality service. Concern that the benefits of Cardiff model will be destroyed.	The model is intended to provide as comprehensive a service as possible within the resource available. The comment on specialism is noted and indeed the proposal to create an Enterprise and Specialist services section is partly based upon a development of that specialist knowledge both to enhance the service within service delivery terms and to generate income to better support the service in the coming years
204	Service	Cardiff	Staff Portal	Cardiff has been able to lead best practice across Wales in a number of areas, particularly Communicable Disease with projects like the national Cryptosporidium in Swimming pools project and Campylobacter surveillance. This loss of specialist roles will remove our ability to excel in this way.	The project team understands your assertion. That said, the financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff and measures will need to be considered that could result in a significant change in service delivery

205	Project	Cardiff	Staff Portal	Why “ the Vale” is a commonly recurring question. Staff want to continue to be employed by Cardiff Council because it is seen a forward thinking authority and also stated... people have a lot of respect for our Chief Executive.	The Host Employer is the paying Authority. Staff will be working for a new larger Regional Service, (which as I have noted in briefings needs a brand to help with this concept and perception,) the New Service will be governed by a Joint Committee, and Management Board of All three Councils, that is not the same as merging into another council, Cardiff will very much retain it's say via our Chief Executive and nominated board managers and Members in how matters are run. The flexi system and other policies is a detail to be discussed with the new management board and committee. Overall the proposal for the Host Authority has been the subject of discussion at the various Scrutiny Committees and will be a decision for elected members.
206	Project	Cardiff	Staff Portal	Vale as a choice of host is a concern for staff. For example, issues like the flexi policy which is less generous. Justification in report is partly due to road network - staff disagree with this, as they use the roads often and they are extremely busy / problematic.	The Host Employer is the paying Authority. Staff will be working for a new larger Regional Service, (which as I have noted in briefings needs a brand to help with this concept and perception,) the New Service will be governed by a Joint Committee, and Management Board of All three Councils, that is not the same as merging into another council, Cardiff will very much retain it's say via our Chief Executive and nominated board managers and Members in how matters are run. The flexi system and other policies is a detail to be discussed with the new management board and committee. Overall the proposal for the Host Authority has been the subject of discussion at the various Scrutiny Committees and will be a decision for elected members.
207	Project	Cardiff	Staff Portal	Acceptance that whilst there are benefits to collaboration, Vale and Bridgend will gain more.	The model is intended to provide as comprehensive a service as possible within the resource available across all three Councils
208	Service	Cardiff	Staff Portal	Concern about the high proportion of technical staff...which will lead to a loss of experienced staff over time. The danger is that we won't recruit staff of the same skill base in future.	The project team understands your assertion. That said, the financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff and measures will need to be considered that could result in a significant change in service delivery.
209	Service	Cardiff	Staff Portal	Elements of what we have in Cardiff is really good – e.g. the CIS system. The Vale don't have this.	The point is noted and well made. If a decision is made to proceed with collaboration, the new management team will look to ensure that best practice is identified and adopted within the resource available.

210	Service	Cardiff	Staff Portal	Concern that the Business model has been developed based on an audit model rather than an inspection model. The latter requires that any IT system that supports the new regime is more flexible. Inspections require more time to complete than an audit. Auditing approach is acceptable for low risk businesses but not high risk.	The model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. It will need to reflect best practice in terms of inspections and take heed of advice from Government and other Regulators. Much of the detail around service provision will be developed and finalised by the new management team in 2015, as they work through the TOM and service demands, if the proposal is agreed. Officers from all levels will be encouraged to participate in that process.
211	Service	Cardiff	Staff Portal	The vision or service standard for the new organisation needs to be specified in order to know whether statutory services can be delivered for example.	The model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. It will need to reflect best practice in terms of inspections and take heed of advice from Government and other Regulators. Much of the detail around service provision will be developed and finalised by the new management team in 2015, as they work through the TOM and service demands, if the proposal is agreed. Officers from all levels will be encouraged to participate in that process.
212	ICT	Cardiff	Staff Portal	It is felt that realistically the new way of working, supported by IT and hand helds etc. is unlikely to be a quick fix. Not achieved in Worcestershire 4 years on. Therefore to achieve this more quickly important that existing staff (over an above the number in the proposed structure) should be employed to deliver the change programme.	Your concerns are noted. The project team has been in dialogue with Worcester and other collaborative services to discuss their experiences and understand how best those difficulties can be avoided or mitigated. ICT infrastructure is a recognised key risk for delivery within the project and preparatory steps are being taken to prepare for a decision, that will enable the ict teams in the councils to drive forward the essential changes needed
213	Service	Cardiff	Staff Portal	The figures for number of qualified staff vs non qualified staff are thought to be based on the number of formal enforcement actions that have been previously undertaken. Competent & qualified people would still be required to inspect and undertake activities such as voluntary closures. The required qualifications are set out in the Food safety area....it is difficult to tell whether this has been taken into account.	The model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. The financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff and measures may need to be considered that could result in a significant change in service delivery.

214	Service	Cardiff	Staff Portal	It is felt that the report is biased - written with the intention of promoting the collaborate and change model over all others.	The report does concentrate upon the "Collaborate and Change" model. The Councils employed Atkins to test the hypothesis of a number of options, the initial options appraisal identified that a collaborative service across the three Councils could be the most beneficial they were therefore further tasked to provide a Target Operating Model best placed to deliver such a vision. After assessing further Atkins formed the view that "Collaborate and Change" was the best option and as such their business case is written on that basis.
215	Service	Cardiff	Staff Portal	Concern that it will be easier to cut funding further in future due to the arms length connection with the Council	The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff. I reiterate, the service would not be at arms length and my earlier comments in this regard.
216	Service	Cardiff	Staff Portal	Too much emphasis on cost cutting and not enough on service delivery and what the customer will be able to expect.	See Below
217	Service	Cardiff	Staff Portal	Key objectives of the collaboration are to provide resilience in the service and deliver a customer focus. Perception is that there is insufficient detail / emphasis in the papers about how these objectives are actually to be achieved that the emphasis is all about cost cutting.	The project team understands your concern. The model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. However, the financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. The need to make savings, at an unprecedented level impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff and measures will need to be considered that could result in a significant change in service delivery.
218	HR	Cardiff	Staff Portal	Consultation period too short given the time of year	The consultation was originally scheduled to end on 22-08-14. Following discussion with trade unions this has now been extended for all Councils up to 5th September 2014
219	Project	Cardiff	Staff Portal	Would like managers in Cardiff to visit Worcester to determine the effectiveness of the collaboration there.	The project team has been in dialogue with Worcester and other collaborative services to discuss their experiences and understand how best those difficulties can be avoided or mitigated. Should the proposal go ahead, the new management team will continue that dialogue and undertake further visits when necessary.
220	Project	Cardiff	Staff Portal	They would like to see the salary scales for the Vale Council. They are available to Vale staff and feel that this is only fair.	The appendix dealing with indicative salaries was redacted on the basis of concerns about data protection. It has been agreed that this decision will be reviewed and information shared where there are no remaining DPA concerns.

221	Service	Cardiff	Staff Portal	<p>Report states that each authority would need to give authority for individual enforcement actions – this introduces an unnecessary layer of complexity and delay. In practice how would this be achieved?</p>	<p>It is proposed that the authorities would discharge their Regulatory service functions jointly by a joint committee and in turn through officers working in the combined service. (Please see paragraph below regarding licensing which has a different arrangement). In relation to the shared service it is proposed that the relevant employees from the participating authorities would transfer to the host authority, as if this were a transfer within the meaning of the Transfer of Undertakings (Protection of Employment) Regulations 2006. The officers would become officers of the host authority. There are a number of powers (sections of legislation) that can be relied upon to facilitate such collaboration and which enables two or more local authorities to discharge their functions jointly and do so by a joint committee of theirs and/or an officer or officers of one of them. Of particular relevance is: • Local Government Act 1972 (s101 and 102) • Local Government Act 2000 (S19 and 20), • Local Government (Wales) Measure 2009 (section 9) and • Local Authorities Goods and Services Act 1970, in terms of one authority providing goods and services to another. As regards the functions under the Licensing Act, which will remain the responsibility of each local authority, as noted in the recent briefing this would remain governed by the Public Protection and Licensing Committee in Cardiff, it is proposed that the shared service will support each authority in carrying out such functions. This work would be carried out by making staff engaged in the shared service available to each participating authority as demand requires. In terms of powers section 113 of the Local Government Act 1972 is of particular relevance. The draft cabinet report sets out further detail and advice on these matters. Importantly, whilst the joint service will prepare enforcement cases, the decisions upon prosecution will rest with the originating authority's legal teams.</p>
222	Project	Cardiff	Staff Portal	<p>Staff are concerned at the lack of detail available and question how each authority can make a decision about whether to go ahead with collaboration when the level of service to be provided has not been specified. Will each council get the same level of service for example? This is considered to be a critical issue when politicians decide whether to go ahead.</p>	<p>A core service delivery document is being developed to provide more detail for the revised target operating model. The model is intended to provide as comprehensive a service as possible within the resource available across all three Councils.</p>

223	Project	Cardiff	Staff Portal	The content of the report is problematic as there is a view that information contained within it is inaccurate and that sweeping statements have been made e.g. 100k allocated to each authority in the change only model for IT investment with no justification about what this would be spent on & why it is the same for every authority – how could this be right?	The assumptions underpinning the report are based on the previous experience of the Atkins team from working with other local authorities. The figures are conservative and have been agreed as realistic with work stream leads from each authority.
224	Service	Cardiff	Staff Portal	Safeguarding and work with vulnerable people not included in the report (however I did notice that it was included in your presentation today).	The projects and general functions around safeguarding that you mention in your earlier mail were discussed in the staff workshops and their omission from the list at page 69 is an oversight; however the Atkins Report cannot be edited any further at this stage. You have raised some valid concerns which need to be considered in light of the reduced provision available to deliver the services. At this stage, the project team would agree with your assertions about the importance of the work undertaken to protect vulnerable people and suggest that the function is best placed within the Neighbourhood services team. The final decision would rest with the new management team, should the proposal to collaborate be approved and your comments will be taken into account.
225	Service	Cardiff	Staff Portal	The expectation to double the income currently generated is a concern, particularly as there is no detail given about how that would be achieved.	The assumptions underpinning the report are based on the previous experience of the Atkins team from working with other local authorities. The Enterprise and Specialist services section would have the main responsibility for identifying and generating new income. Much of the detail around service provision will need to be developed and finalised by the new management team in 2015, as they work through the TOM and service demands, if the proposal is agreed. Officers from all levels will be encouraged to participate in that process.
226	Service	Cardiff	Staff Portal	Trading Standards is very much learnt on the job from other more experienced staff. The concept that most technical staff will be mobile and working from home will change the development requirements. Training package would need to be put in place (possibly at additional cost) to plug this gap. There is concern that training portfolios may not be as easily completed.	The concern is noted and as indicated earlier if a decision is made to proceed, the appointed Management Team will need to consider the issues and concerns expressed in light of the reduced provision available to deliver the services, as part of the implementation phase.

227	HR	Cardiff	Staff Portal	Staff are very keen to understand the ring fencing / job slotting proposals.	The newly appointed Management team would be responsible for staff appointments within the new service, once the TUPE transfer has been completed. The process for appointment has not been detailed, and will only be detailed should the project progress. The project will consult with the Trade Union Forum to ensure that the most appropriate process is put in place. It will, however be based on sound and transparent principles to be agreed with the trade unions. For some employees this may include "job matching" i.e. appointment to the same or similar post and for others it may include a competitive selection process. All posts will be ring-fenced to existing staff (although the size and shape of the ring fences will need to be determined in consultation with the trade unions. Staff will be supported through the process
228	Service	Cardiff	Staff Portal	IMLU staff have asked to be advised of their position within this collaboration proposal and whether "people in temporary posts not being able to apply for a position in the new structure" applies to the staff currently in or being recruited to the IMLU team.	At the moment the IMLU is subject to a separate funding regime and the finances have not been included in this report. It is envisaged that the IMLU would be a part of the collaborative service, but this would need to be agreed with other partners before any formal decision can be made to transfer the IMLU to the collaborative service. Until such a decision can be made, the IMLU will remain part of Cardiff Council.
229	HR	Cardiff	Staff Portal	There is a thirst for more information regarding the TUPE requirements. People want to know whether, when they secure a new post in the new structure, their existing terms and conditions will be protected. A briefing note around this issue, to explain the different potential circumstances would be useful.	Depending on a decision being made in October to progress the collaboration project, staff workshops in relation to TUPE will be held covering the process and points raised in this question. This will be a necessity as part of the TUPE consultation process and will need to be undertaken by both the transferee Councils and the host employing Council.
230	Service	Cardiff	Staff Portal	The EHO and TSO job titles are very important to this group of professional staff. They would like to retain these titles in the new structure.	I understand this concern and the project team have it registered and these important details will be considered by the new management team, should a decision be made to pursue the collaborative approach.
231	Service	Cardiff	Staff Portal	Report states that CD activity is in the Commercial Services element of the service, whereas your presentation advised staff that the role was in the Enterprise team. Clarity on this point is needed.	Thank you for identifying that issue. Much of the detail around service provision will need to be developed and finalised by the new management team in 2015, as they work through the TOM and service demands, if the proposal is agreed. Officers from all levels will be encouraged to participate in that process and as such can influence the best location for the CD service element.

232	Service	Cardiff	Staff Portal	Maintaining specialist officers (whilst authorised and able to deal with obvious hazards in a number of different disciplines during site visits) is considered to provide a higher standard of service, more efficient as less research is required prior to each visit & costs less for training and ongoing CPD. The papers, as they are currently written, give the impression that each officer will be equally competent in all aspects of TS and EH work. I'm fairly confident that this isn't the intention, but clarification on this aspect would be appreciated.	The project team does not envisage officers being equally competent in all aspects of TS and EH work, but there will be a need for officers employed in the new service having the capacity to identify, and where appropriate, to deal with a wider range of issues. Maintaining specialist officers is an important element of the new model.
233	Service	Cardiff	Staff Portal	The priority given to health and safety work is a concern; staff perceive that food safety inspection targets will always be given priority.	Thank you for raising this concern and your point noted will be considered by the new management team during implementation should a decision be made to pursue the collaborative approach.
234	Service	Cardiff	Staff Portal	Info. on the likely office locations was requested	Feasibility work is continuing on locations for the central and local teams, the important issue of EIA and other logistics have been raised in a number of enquiries and clearly further work is needed enforce detailed locations on the proposals can be made.
235	Service	Cardiff	Staff Portal	Will staff be primarily working in specific patches or travelling across all three local authority areas. Preference is to have a "patch" that they can become familiar with. This helps in terms of - knowing the businesses and building trust, gaining local intelligence and quickly being able to gather contact details. Also more efficient in mileage allowance costs.	Much of the detail around service provision will need to be developed and finalised by the new management team in 2015, as they work through the TOM and service demands, if the proposal is agreed. Officers from all levels will be encouraged to participate in that process and influence the outcomes
236	HR	Cardiff	Staff Portal	Making informed choices about VS decisions is difficult at present, due to limited information available.	Each Council has different approaches to the issue of voluntary severance and as such it is important for you to contact your own HR team for more specific information. There has been no cross authority agreement in terms of this issue.
248	HR	Vale	Staff Portal	It is essential that members and also the service users are aware that there will be implications regarding the service that they get at the moment and the service they will be getting. I think it should be made clear to everyone that only statutory functions will be carried out.	Cabinet and Council will be making a decision on whether the collaboration project proceed on from October onwards. There will however be a long way to go in terms of the initial transfer of staff and then the remodelling process. The success of this will, indeed depend on large part on the engagement of staff across all parts of the new service to build relationships, share good practice and deal with any operational and cultural challenges. This will continue up to and beyond September 2015.

249	HR	Vale	Staff Portal	Still differences in way authorities are being treated Cardiff have until 5th Sept to make comments but we have until 22nd august. The reason given is more staff in Cardiff. The aim of this is to provide one service but we are being treated differently. We should all be given the same documents at the same time and have the same timescales to respond i.e. an level playing field.	Following discussion with the trade unions on the 13th August it has been agreed to extend the timescale for consultation responses (for staff in all Councils) to the 5th September 2014.
250	HR	Vale	Staff Portal	Over the last 2-3 years when posts have become vacant in certain areas of public protection the majority of posts have either not been filled or have been filled with either agency staff or staff on temporary contracts the reasoning behind this I believe was to try to provide some security for permanent members of staff. Whilst the Vale has done this I am lead to believe that the other authorities have appointed staff on permanent contracts. It seems unfair that staff who have worked hard to maintain a service may end up without a job due to the inconsistencies of recruitment between the authorities. I would remind you that at one of the committee meetings members commented on the excellence of the service provided by the public protection department.	It is true that there are differences in the numbers of "held" vacancies in each of the three Councils. It is important that a common approach is taken to the issue of vacancy management if the project is given the "green light" in September/October. A protocol is currently being designed in partnership with the trade unions.
251	HR	Cardiff	Staff Briefing Questions	Our current contract is with Cardiff so if we changed to the host authority isn't that a breach of terms and conditions?	This is where TUPE applies. The service is being delivered by another entity so technically posts will transfer to the host employer with appropriate protection of terms and conditions. There will be no breach of contract.
252	HR	Cardiff	Staff Briefing Questions	For what period of time would we be protected?	Staff will transfer with their current contractual terms and conditions. After the transfer process, consultation will begin in relation to the restructuring of the service to move to the new operating model. In some cases this will involve the appointment of staff to the same or similar roles (in which case TUPE protection will continue. Where staff are offered appointment to significantly different roles then the new terms and conditions will apply.
253	HR	Cardiff	Staff Briefing Questions	Will we have the Vale of Glamorgan's terms and conditions?	Staff will transfer with their current contractual terms and conditions. After the transfer process, consultation will begin in relation to the restructuring of the service to move to the new operating model. In some cases this will involve the appointment of staff to the same or similar roles (in which case TUPE protection will continue. Where staff are offered appointment to significantly different roles then the new terms and conditions will apply.

254	HR	Cardiff	Staff Briefing Questions	Will this be before the consultation ends?	There will be a consultation process on the transfer and then a consultation process on the new structure and the trade unions are involved with those consultations. There will be no changes until the consultation processes have been completed
255	HR	Cardiff	Staff Briefing Questions	We had an email from requesting VS applications be in by the 12th September 2014 but we do not have enough information such as TUPE etc. to be able to make the decision so will there be flexibility on the VS process?	The letter you refer to was sent to all staff in Cardiff Council in relation to the generic approach to wider budgetary pressures. It is not specific to the Regulatory Services Review and does not represent an approach across the three authorities. Each Council have different approaches to the issue of voluntary severance and as such it is important for you to contact your own HR team for more specific information. .
256	HR	Cardiff	Staff Briefing Questions	It is unfair that there is so little solid information for staff to know if they want to stay or go on VS in February / March 2015.	I do understand but we will have the information before March but not today. By the end of February there would have been 3-4 months of solid information for you by then.
257	HR	Cardiff	Staff Briefing Questions	Why did it say in the email that existing VS applications should be destroyed?	See answer to question 256 above in relation to the cardiff specific approach to VS. The reference in the question is not correct. If employees in Cardiff have already made an application you do not need to make another one.
258	HR	Cardiff	Staff Briefing Questions	What if everyone came forward to apply for VS?	See answer to question 256 above in relation to the cardiff specific approach to VS. Each application within Cardiff would need to be supported by a business case that reflects the needs of the service.
259	HR	Cardiff	Staff Briefing Questions	So would it be on a first come first serve basis?	See answer to question 256 above in relation to the cardiff specific approach to VS. If an employee in Cardiff is already in the process then it is. Applications will be prioritised as to which is least expensive to the authority. We would need to look at where everyone is in the process.
260	HR	Cardiff	Staff Briefing Questions	So is the deadline February 2015?	Each Council has different approaches to the issue of voluntary severance and as such it is important for you to contact your own HR team for more specific information. There has been no cross authority agreement in terms of this issue.
261	HR	Cardiff	Staff Briefing Questions	What date applies for the VS package?	See question 261 above
262	HR	Cardiff	Staff Briefing Questions	We are sceptical that being asked to reapplying for VS will delay everything so that our actual date of leaving will be after April which better suits the authority.	See Question 261 above

263	HR	Cardiff	Staff Briefing Questions	When we transfer to the host authority I noted that the business case mentioned compulsory redundancies and a figure for if you were over 55 or under 55. Where did the figure of £8000 come from?	Someone has already emailed about this and about access to pensions. There is an answer. That's not the value you would get. The business case is based on assumptions to develop averages. Cardiff, the Vale and Bridgend have different redundancy schemes. Cardiff and Vale pension schemes are the same but Bridgend is different. We are just trying to get an average. Over 55 you can get the lump sum but under 55 you can't. It will depend on each particular case. It would be Cardiff's VS that would apply but not the current one – the 2015/16 policy. If anyone wants to contact Juliette individually you can.
264	HR	Cardiff	Staff Briefing Questions	If you have a temporary contract until the end of March does that mean you are gone?	Please discuss your individual circumstances with your Human Resources Officer
265	Service	Cardiff	Staff Briefing Questions	Under the proposed structure it seems that all the job titles have altered so in admin we can't see where we fit in.	This is part of what we said about putting meat on the bones. That will come after October. We have been asked for a brief description in relation to the new job titles and we will try to get that out to you as soon as possible.
266	HR	Cardiff	Staff Briefing Questions	Will there be element of slot and match?	The newly appointed Management team would be responsible for staff appointments within the new service and once the TUPE transfer has been complete. The process will involve the trade unions. Recruitment will take place later on down the line. We want the fairest way for staff to be recruited to the post.
267	Service	Cardiff	Staff Briefing Questions	What would the new equivalent posts be to the current title roles of Environmental Health officer and Trading Standards officer.	This matching will help when you have the brief job descriptions that I mentioned earlier.
268	Service	Cardiff	Staff Briefing Questions	The business case mentions a 10% reduction. How was this arrived at?	It was 13%. This was in the Atkins report but not on the 14/15 finance figures. The amount of posts in the dogs home have not been quantified so it won't add up. IMLU have been excluded from the figures as well. The Welsh Landlord Licensing scheme will have Cardiff as its host so we will have to be recruiting for that so potentially there are new posts. We have to be sure of the costings and we are not sure if it will go into collaboration or not. In September or October we will have more information. Members will also want to take some decisions on this. Maybe the joint committee will agree some policies. Members from Cardiff will want to ensure the policies are fair also. So the door is open to flexibility.
269	HR	Cardiff	Staff Briefing Questions	Some staff are concerned about the different flexi time arrangements in the Vale. Will they apply to us?	We don't know at this stage

270	Service	Cardiff	Staff Briefing Questions	With the Vale's different core hours officers would not be able to carry out the same visits.	This will be scrutinised by the trade unions. It will be looked at.
271	HR	Cardiff	Staff Briefing Questions	The reduction in hours from 37 to 36 hours was not something the trade unions were happy about but it was still 'sign the contract or no employment'.	This relates only to Cardiff employees and not the Regulatory Services collaboration project.
272	Service	Cardiff	Staff Briefing Questions	Will these consultations change what is in the cabinet report?	No but they will be taken into account for the TOM and the cabinet report will contain the key issues for staff
273	Service	Cardiff	Staff Briefing Questions	A key concern for some staff is that job titles are disappearing ie EHO and TSO are recognised internally and externally and we would wish to retain that in the future structure.	The job titles are not etched in stone. I understand that these roles are more combined in the other 2 authorities than in Cardiff already but it does not extend to a TSO doing the role of an EHO. This is maybe something we can work through.
274	Service	Cardiff	Staff Briefing Questions	If the titles of TSO and EHO changes there will also be confusion from customers. How will you address that?	All communications are internal at the moment. Now engagement is starting to take place with external stakeholders such as the FSA; the police etc. Once collaboration is agreed there will be an external communications campaign to deliver this which will involve things such as rebranding, hubs etc. Hopefully customers shouldn't see that much difference. It will all be about how we target external stakeholders. If we do not get permission to proceed then there is no sense to go outside now. I am having questions about uniforms and that level of detail we don't know yet. When it happens we will have open trade days and roadshows but it all takes time. There will be a transition period and that has been considered and costings done as well.
275	Service	Cardiff	Staff Briefing Questions	Will there be ports of call for the public?	This level of detail we don't have yet. Atkins put forward 3 potential satellite hubs eg maybe one in the Alps because of access. Communications will be based around those properties. Quality impact assessments would have to be done as well as service level agreements between contact centres and residents. We don't know where we are moving to yet.
276	Service	Cardiff	Staff Briefing Questions	We need to accommodate people who come in to see us to give us documents etc	This kind of detail will normally be done by the chief officer and the management to ensure the new service delivers. We will always want to have one to one contact eg when taxi drivers drop things off when they are out and about on their routes. We do not want to move away from one to one contact. There will be equality impact assessments for access by customers.
277	HR	Cardiff	Staff Briefing Questions	If we apply for VS how long will it take?	The unions and the project team are keen to be able to agree a common sense position on VS (subject to any legal considerations and supported by an appropriate business case). This has not yet been agreed. In relation to voluntary severance in general (not relating to the collaboration project) employees should follow their current employers normal processes.

278	HR	Cardiff	Staff Briefing Questions	Today we have had the email regarding budget cuts and advising people who want to take VS to do so. If someone takes VS now will that post form part of the 26?	This question relates to Cardiff employees only. It will potentially reduce the number but for reasons connected with budget issues within the authority and not as a result of the collaboration project.
279	HR	Cardiff	Staff Briefing Questions	Will that lost post, being pre-collaboration, mean that following collaboration you won't still be looking to take the full 26?	See question above
280	HR	Cardiff	Staff Briefing Questions	Without job descriptions and details how are people able to make any decisions about VS?	There will be a consultation process prior to the transfer which will provide staff with more information. The unions and the project team are keen to be able to agree a common sense position on VS (subject to any legal considerations and supported by an appropriate business case). This has not yet been agreed. In relation to voluntary severance in general (not relating to the collaboration project) employees should follow their current employers normal processes.
281	HR	Cardiff	Staff Briefing Questions	If collaboration goes ahead will the policies on VS apply just to Cardiff and not necessarily the Vale?	It is proposed that any severance arrangements that take place (as appropriate) before the transfer will be subject to the terms of the employee's current local authority. Post transfer arrangements for severance will be reviewed as part of the TUPE consultation process between November 2014 and March 2015.
282	Project	Cardiff	Staff Briefing Questions	When can we expect the information on job descriptions?	The decision regarding the host authority will take place in October 2014 and the host authority will start work immediately on these matters as we know it is a priority for staff.
283	Project	Cardiff	Staff Briefing Questions	Why then are we having meetings in September?	The meetings in September are about sharing the feedback from everybody. They are feedback and engagement sessions. We won't then have the information about job descriptions as that will come around November – December. People will have other questions about how the service will operate and I would think that would be of interest to you all. I understand that this is difficult on a personal level and you want the information to enable you to make the choices you need to make. This is the first step of several steps to a new service. Nothing will happen the next day. There will be enough time for staff consultation before the next step occurs. There will be lots of meetings so you will be fully informed.
284	HR	Cardiff	Staff Briefing Questions	Assuming all goes to plan you mentioned TUPE safeguards – can you expand on the safeguards?	Staff will transfer with their current contractual terms and conditions. After the transfer process, consultation will begin in relation to the restructuring of the service to move to the new operating model. In some cases this will involve the appointment of staff to the same or similar roles (in which case TUPE protection will continue. Where staff are offered appointment to significantly different roles then the new terms and conditions will apply.

285	HR	Cardiff	Staff Briefing Questions	What is the likely timescale for this?	There will be a pre-transfer consultation in November with a transfer in April 2015. There will be consultation between November and April. I will be available during that time to meet staff either personally or in groups to answer any questions that they may have.
286	HR	Cardiff	Staff Briefing Questions	What do you mean by 'consultation'?	It has got to be meaningful in the eyes of the law. This is our proposal and you give your views on whether you think it is lawful and if its works. It will affect all staff. All of you will get the same letter. As a representative from HR will speak to you individually or as a group if you prefer.
287	HR	Cardiff	Staff Briefing Questions	Ideally when will the dust settle?	Following the recruitment process to the new structure. The intention is that this process will be completed by September 2015.
288	HR	Cardiff	Staff Briefing Questions	For what period of time will we get statutory protection?	If there is a straightforward TUPE it can go on for years and years. If it is not a straightforward TUPE then things can change. We will be able to discuss this better closer to the date.
289	HR	Cardiff	Staff Briefing Questions	Cardiff has just dropped everyone to a 36 hour contract will that continue into the new service?	Should the project proceed then employees will transfer on the contractual terms relevant immediately before the transfer. This will apply to working hours and the plans in Cardiff in relation to the 36/37 hour week
290	HR	Cardiff	Staff Briefing Questions	Will the reduction of 26 posts be at ground roots?	The potential reduction in post numbers is spread largely across all levels within the current organisational structure.
291	HR	Cardiff	Staff Briefing Questions	Will those who lose posts be able to apply down for other posts?	Policies regarding any ring fencing arrangements or slotting matters still have to be set out by the joint committee. I am not familiar with the Vale's processes regarding restructures. There may be an option to adopt theirs or adopt a new one by the joint committee. We also have a commitment to work with the trade unions.
292	HR	Cardiff	Staff Briefing Questions	There used to be a provision within Cardiff Council that if you had worked at a specific location for so many years and then you were relocated you were given costs. Is this still available?	This stopped a number of years ago, so no.

293	Service	Cardiff	Staff Briefing Questions	<p>I note that under Neighbourhood Services group there is a category for consumer protection. At this time CCC has put out to tender for a consortium to provide a joined up advice service across the city to include consumer services. How will this alternate 2 nd tier of advice on consumer services affect us going into collaboration? If this goes out to tender where will we get our information from? Our managers don't seem to know anything about it.</p>	<p>The project team has been aware of the tender proposal. It is our understanding that the tender does not seek another body to undertake the second tier intervention role, nor does it intend to impact upon the first tier role undertaken nationally through the Citizens Advice Bureau. We are advised that the current provision of welfare advice - the type of services that CAB, Speakeasy, Cardiff Law, etc. currently provide - is the main focus of the tender and that there is no change other than the move to fund one organisation to provide advice in the City. Occasionally, the provision of welfare advice requires the provision of basic consumer advice as part of a holistic response to queries and the tender simply wishes to ensure that this existing provision is covered.</p>
294	Project	Cardiff	Trade Union Scrutiny Questions	<p>Are the Scrutiny Committee members aware of the unacceptably short timescale between the collaboration report (300 pages) being released to staff and this meeting (17th July -29th July)? A grievance has been lodged regarding this issue by both Cardiff and Vale of Glamorgan staff. Many staff are on annual leave due to it being the school summer holidays and have had no opportunity to either read the report or raise concerns regarding it. Would the Scrutiny Committee agree to meet again regarding this matter so all employees affected have a reasonable opportunity to comment on this report?</p>	<p>The pre-decision engagement process started on 11th July and was originally scheduled to end on 22nd August. Following discussion with trade unions, this has now been extended for all Councils up to 5th September 2014. The Cabinet report will contain an appendices illustrating the response from the pre-decision Scrutiny process along with the comments and feedback from the staff and Trade Unions.</p>
295	Service	Cardiff	Trade Union Scrutiny Questions	<p>Appendix A – The Atkins Regionalising Regulatory Services Consultancy Report. Page 81 Point 5.11.2 Commercial Services second paragraph at the bottom of the page. The Food Law Code of Practice (Legal Requirement) states that certain establishments should be inspected only by Environmental Health Officers or officers holding the Higher Certificate in Food Premises Inspection. Certain critical enforcement action can only be undertaken by Environmental Health Officers. If the intention is to train non-qualified officers up to the Higher Certificate Level which is expensive i.e. approximately £1650 and time consuming i.e. at least a year, has this been costed?</p>	<p>Across the three Councils, there should be sufficient numbers of qualified staff to undertake the duties required. The project team does not envisage officers being equally competent in all aspects of TS and EH work, but there will be a need for officers employed in the new service having the capacity to identify, and where appropriate, to deal with a wider range of issues. Maintaining specialist officers is an important element of the new model. Teams will be expected to 'to do everything' in their remit. This does not mean every officer. Within teams there will still be specialist TSOs and EHOs though they will be expected to have a wider remit than for example just undertaking Food Hygiene Inspections. As mentioned above through refresher training EHO's for example would be expected to inspect Food Standards and Health & Safety issues during an inspection. Proprietors are expected to know these areas and would expect our officers to also be competent in them.</p>

296	Service	Cardiff	Trade Union Scrutiny Questions	Appendix B - Supplement to the Atkins report on Regionalising Regulatory Services. Page 21 EHO training for metrology. Trading Standards say that this is an intense and expensive course that usually costs around £2,000. A Trading Standards background prior to course enrolment is usually assumed. Where can it be provided for 17 Officers at £300 each?	See answer provided above - - We would not expect to train TSO's to undertake High Risk Food Hygiene Inspections when we already have sufficient competent staff to do the work, nor EHO's to undertake weights and measures duties. Competent staff may be required to undertake lower risk work across the professional boundaries, but the intent is to retain specialist capabilities within the available financial resource.
297	Service	Cardiff	Trade Union Scrutiny Questions	Page 21 TSO training for Health and Safety. To achieve a level of health and safety training to enforcement standard level cannot be achieved in a brief time and is not cheap. Where can it be obtained for £300 for 7 officers?	See answer provided above
298	Service	Cardiff	Trade Union Scrutiny Questions	Page 40 Collaboration & Change Option Final Draft. This operating model is less identifiable as a Regulatory Service than is currently the case as for many years the public have been familiar with dealing with Environmental Health Officers (EHO) and Trading Standards Officers(TSO). Will the creation of the new post/titles Neighbourhood Technical Officer and Commercial Services Technical Officer etc. be confusing to the public and businesses?	This is a valid observation and the project team have it registered. This will be considered by the new management team, should a decision be made to pursue the collaborative approach.
299	Service	Cardiff	Trade Union Scrutiny Questions	Page 40 Collaboration & Change Option Final Draft. Identifies 168 posts in the proposed structure. This compares with 193 posts in the proposed Collaboration and Change Model a year ago (Page 130 of Atkins Report) and 280 staff that were employed in September 2013 (Page 16 of Atkins Report).This is a massive proposed reduction in posts (40%)from 280 to 168. The key question therefore is the Scrutiny Committee completely satisfied that this proposed Shared Regulatory Service will be fit for purpose to deliver Environmental Health, Trading Standards and Licensing efficiently and effectively across 3 Authorities Bridgend ; Vale of Glamorgan ; Cardiff with a combined population of 622,000 ?	There re 178 posts in the structure. Based on staffing levels at July 2014 the number of potential redundancies would be approximately 26 FTE. It is expected that this figure will further reduce on implementation of the new service model as a result of the continuing approach to vacancy management and based on the revised organisational structure at page 40 of Appendix B. Members will be aware, however that further savings may, however be necessary following the implementation of the new service.- Collaboration offers the opportunity for the Council to maintain services in a cost effective way and ensure we can continue to deliver as robust as service as the current financial position allows.

300	Service	Cardiff	Trade Union Scrutiny Questions	<p>Page 40. There will be risks to food safety & the Service if the proposed structure for delivery is implemented by diluting the expertise and reducing the numbers of expert professionals employed. If the proposed Regulatory Service failed who would be held accountable?</p>	<p>There is no intention to dilute technical capability. Competent EHOs will still be involved with High Risk Premises and likewise competent Trading Standards Officers will be undertaking enforcement against illegal trading practices. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff. The Joint committee will have responsibility for the service and report back to each Council on performance. There will be a Management Board consisting of senior officers from all three Councils, that is not the same as merging into another council, Cardiff will very much retain its say via our Chief Executive and nominated board managers and Members in how matters are run.</p>
301	Service	Cardiff	Trade Union Scrutiny Questions	<p>Page 21 Point 3.3.3 Claims that the information gathered from the staff workshops was given extensive consideration and clearly informed the Target Operating Model, Business Case and Implementation Plan. The question arises as to why were a number of the major proposals such as the removal and demotion of EHO's and TSO'S to Consumer Service Officers and Consumer Service Technical Officers never mentioned at these staff workshops?</p>	<p>The workshops were aimed at developing a new operating model and sought the views of staff. That information along with other data was used by Atkins to create a new target operating model which is the subject of the current consultation.</p>
302	Service	Cardiff	Trade Union Scrutiny Questions	<p>The effect of Environmental Health Officers and Trading Standards Officers becoming Commercial Services Officers encompassing both remits. The report suggests the 2 professions can somehow be squeezed together. Both jobs are highly specialist requiring long term training. How will this work in practice? How will we ensure our statutory functions regarding food hygiene inspections are prioritised and that ultimately public health is not put at risk? We are not meeting our statutory functions now due to job cuts and more job cuts are to come. How can the City of Cardiff Council justify cutting more staff from the Food Safety function?</p>	<p>In terms of Food law enforcement, the model envisages that competent EHOs will still be involved with High Risk Premises and likewise competent Trading Standards Officers will be undertaking enforcement against illegal trading practices. The model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff.</p>

303	Service	Cardiff	Trade Union Scrutiny Questions	Environmental Health Officers in Cardiff working in the health and safety section have specialist health and safety knowledge and experience however due to the current set up in the Authority, these officers will not currently be deemed 'competent' in food hygiene. As a result these officers feel they are unlikely to gain employment within the new structure as they will effectively be competing against EHO's in the Vale and Bridgend who are currently supposedly undertaking both health and safety and food hygiene enforcement. Do you think this unfair on Cardiff H&S EHO's?	Across the three Councils, there should be sufficient numbers of qualified staff to undertake the duties required. The project team does not envisage officers being equally competent in all aspects of EH work, but there will be a need for officers employed in the new service having the capacity to identify, and where appropriate, to deal with a wider range of issues. Maintaining specialist officers is an important element of the new model. Teams will be expected to 'to do everything' in their remit. This does not mean every officer. Within teams there will still be specialist TSOs and EHOs though they will be expected to have a wider remit than for example just undertaking Health and safety enforcement. As mentioned above through refresher training EHO's for example would be expected to inspect Food premises during an inspection.
304	Service	Cardiff	Trade Union Scrutiny Questions	Referring to the legionella outbreak at the Copthorne hotel in 1999, which resulted in two deaths the Vale of Glamorgan Council had to pass the investigation on to the Health and Safety Executive (HSE) due to the lack of technical knowledge held by the Vale's EHOs. The HSE would not have the capacity to take on local authority work as well now due to the cuts they have had to their resources. How would the new proposed structure deal with a future scenario without specialist officers in such matters?	The project team is unable to comment upon the incident. As you note the HSE have had to cut resource. The Council faces similar difficult decisions. The proposed model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff.
305	Service	Cardiff	Trade Union Scrutiny Questions	Who will investigate a major health and safety incident/fatal accident in the new authority?	This would depend upon the premises where the incident took place. If the responsibility fell to the Local Authority, it is intended that the new service would assume responsibility for the investigation.
306	Service	Cardiff	Trade Union Scrutiny Questions	Cardiff has been involved in many health and safety projects to date that have been proven to have a positive effect on Cardiff businesses and the Cardiff Population. Will these no longer be implemented?	The proposed model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff.

307	Service	Cardiff	Trade Union Scrutiny Questions	Who will investigate a food poisoning outbreak in the new authority given the limited capacity/competency of officers? When no mention is given to lead officer duties.	There is no intention to dilute technical capability. Competent EHOs will still be involved in CD investigations. The structure does identify a Public health officer and it is likely that this role will, lead, facilitate and co-ordinate incidents. That said, the financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. If a decision is made to proceed with collaboration, the new management team will look to ensure that best practice is identified and adopted within the resource available.
308	Service	Cardiff	Trade Union Scrutiny Questions	As commercial services officers will have to undertake communicable disease investigations how will this competency be maintained as currently lead officers have to be identified and undergo specialist training on a regular basis?	See answer provided above
309	Service	Cardiff	Trade Union Scrutiny Questions	Many of the projects have been resourced through gaining external funding and this has provided Cardiff with an outstanding reputation of providing innovative public health interventions will this continue and develop and who will have the capacity to do this?	See answer provided above
310	Service	Cardiff	Trade Union Scrutiny Questions	Management of Stray horses. This presents a significant safety issue in Cardiff, where the horses are straying onto busy arterial roads. The problem is different in the Vale and Bridgend where the concerns are mainly fly grazing. Cardiff currently has one officer, but a significant additional resource is drawn in to help when required, from the trading standards team. Out of hours, the council's highways team will respond. It is believed that this is a local problem which requires a local response given that linkages with highways team are critical. Collaboration proposal includes for 1 horse officer across 3 areas. Does the proposal present a risk to the horse warden service due to the reduced resource i.e. is a slower response to matters of concern and dilution of the service received by Cardiff.	The proposed model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. The proposed model does not include an identified role as a horse warden, but identifies three animal welfare officers who would have primary responsibility for this function. As now, there is an expectation that should extra support be needed other officers in the new service would provide the required assistance. The service would have offices in all three Council areas and existing linkages with partners will be maintained.
311	Service	Cardiff	Trade Union Scrutiny Questions	Significant elements of the current trading standards service are not detailed e.g. safeguarding vulnerable people from cold callers and scams. A critical element of this work is Financial Capability Training delivered in Schools in deprived communities. Is it intended that these will be core elements of service and which posts will deliver this work?	The work around safeguarding along with a range of other services will need to be considered in light of the reduced provision available to deliver the services. At this stage, the importance of the work undertaken to protect vulnerable people is placed within the Neighbourhood services team. The final decision would rest with the new management team, should the proposal to collaborate be approved.

312	Service	Cardiff	Trade Union Scrutiny Questions	<p>There are some people in the existing structure (on low grades) which will have no post to apply for in the new structure due to their current qualifications e.g. the Food Safety Team sampling & project officers. It could be argued that the need for these positions is greater when the posts are being shared by 3 authorities. What arrangements will be made for these individuals?</p>	<p>Work will commence on drafting the detailed job descriptions and person specifications once a decision has been made about the project in September/October. This will detail all the requirements for the jobs and will be done in consultation with staff. This subsequent selection process has not been detailed, and will only be detailed should the project progress. The project group will consult with the Trade Unions to ensure that the most appropriate process is put in place. It will however be based on sound and transparent principles. For some employees this may include "job matching" i.e. assimilation to a similar post and for others it may include a competitive selection process. All posts will be ring-fenced to existing staff who will be supported through the process.</p>
313	Service	Cardiff	Trade Union Scrutiny Questions	<p>A real concern is that the service provided by Cardiff will significantly reduce to the lowest standard across the three authorities. For example – Cardiff provides an out of hours service, food hygiene training courses for businesses, pest control services etc not provided by at least one of the other authorities. What guarantee is there that this good service standard will be protected in the proposal. If so, how will this be accounted for?</p>	<p>The concern is noted. The operating model is intended to provide as comprehensive a service as possible within the resource available. That said, the financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff and measures may need to be considered that could result in a significant change in service delivery.</p>
314	Service	Cardiff	Trade Union Scrutiny Questions	<p>How will this proposal ensure that statutory health and safety activity is targeted at the highest risk activities and at businesses who are not managing health and safety risks effectively?</p>	<p>The model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. It will need to reflect best practice in terms of inspections and take heed of advice from Government and other Regulators. Much of the detail around service provision will be developed and finalised by the new management team in 2015, as they work through the TOM and service demands, if the proposal is agreed. Officers from all levels will be encouraged to participate in that process.</p>
315	Service	Cardiff	Trade Union Scrutiny Questions	<p>Is it proposed that the health and safety interventions will be limited to hazard spotting in food businesses? If not please explain the extent of the Health and Safety service that will be provided, by which resource, and the qualifications required.</p>	<p>The model is intended to provide as comprehensive a service as possible within the resource available across all three Councils. It will need to reflect best practice in terms of inspections and take heed of advice from Government and other Regulators. Much of the detail around service provision will be developed and finalised by the new management team in 2015, as they work through the TOM and service demands, if the proposal is agreed. Officers from all levels will be encouraged to participate in that process.</p>

316	Service	Cardiff	Trade Union Scrutiny Questions	Will the proposal allow the Collaborative organisation to continue to be involved in developing and implementing all Wales projects. The current level of resource available in the Vale has often prevented their involvement.	Developing and implementing projects, particularly those that generate income and support employment will be a facet of the Enterprise and specialist services team
317	Service	Cardiff	Trade Union Scrutiny Questions	Cardiff, as a main tourist attraction hosts major events which require specialist input on health and safety. We achieve this through the Events Liaison Panel which is an advisory group chaired and managed by the Health and Safety Team Group Leader, however at least 75% of events are put on by private companies and therefore fall to Cardiff Council for enforcement.	The operating model is intended to provide as comprehensive a service as possible within the resource available. That said, the financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff and measures may need to be considered that could result in a significant change in service delivery.
318	Service	Cardiff	Trade Union Scrutiny Questions	What arrangements will be made for managing each authority's event liaison panel / workload, this is a specialist role, not mentioned in the report?	Much of the detail around service provision will be developed and finalised by the new management team in 2015, as they work through the TOM and service demands, if the proposal is agreed. Officers from all levels will be encouraged to participate in that process and help ensure that the service is as comprehensive as the financial resource allows. .
319	Service	Cardiff	Trade Union Scrutiny Questions	Specialist knowledge is required to deliver an effective and timely communicable disease service. The proposal does not identify a specific post with this responsibility, as we have now in Cardiff. Can you provide details of which post would have the responsibility and assurances that we would continue to receive the same level of service in Cardiff i.e. all notifications being investigated?	There is no intention to dilute technical capability. Competent EHOs will still be involved in CD investigations. The structure does identify a Public health officer and it is likely that this role will, lead, facilitate and co-ordinate incidents. That said, the financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. If a decision is made to proceed with collaboration, the new management team will look to ensure that best practice is identified and adopted within the resource available.

				<p>If there are no net savings to be made by cutting the number of Licensing staff, why are staff numbers being reduced?</p>	<p>Licence fees need to be set in accord with the legislation and recent case law provides further guidance on how that is to be achieved. As part of bringing the Licensing service together across the three authorities, the precise cost of providing the various types of licence will need to be assessed and short falls or surpluses addressed. Achieving the new streamlined licensing service will take time. Any reduction in fee income will not be immediate, and over time, any reduction in income could be offset and exceeded through innovative income generation measures separate to the licence fee. For example, the joint service would have the opportunity to generate income through the Enterprise and Specialist Services section, for staff training packages for a range of licensing associated activities.</p> <p>There will be an additional benefit for the licence fee payer, in that a more streamlined service offers the opportunity to reduce licence fees and have a positive impact upon small business.</p> <p>In terms of the numbers associated with delivering the service, the FTE equivalent should be reasonably consistent. There are currently 25 posts FTE posts directly associated with delivering the service with others carrying out duties that could be assigned to the fees levied for a particular activity.</p>
326	Service	Cardiff	Staff Portal	<p>Have the vast differences in the various licensing policies and byelaws been taken into account in the proposals?</p>	<p>The project team is aware of those differences and they reflect the way in which policy has evolved over time. Managing these differences present will be an important element of the business plan and operating model over the first three years. There are benefits to be achieved through a closer alignment of those controls some of which is already emerging through the Licensing technical panel and we would seek to build upon that over time. In time there may be opportunities for common policies across the three LA areas on aspects of alcohol and taxi licensing and street trading consents</p>
327	Service	Cardiff	Staff Portal		

328	Service/HR	Cardiff	Staff Portal	Licensing Enforcement Officers are paid a 10% shift allowance, but officers in the Vale and Bridgend are not. Will the shift allowance be applied to all enforcement officers?	A complete stock-take of terms and conditions will be undertaken across the three authorities in the autumn if there is a decision to proceed with the project following the Cabinet and Council meetings in September and October 2014. The main principle will be that contractual terms will be protected for staff transfer to a new joint service on 1st April 2015. If therefore the 10% allowance is a contractual entitlement then TUPE protection will apply at that point and should the need for standby continue. If the employee is selected to the same or similar post as part of the remodelling process then TUPE protection will continue. If the employee is appointed to a different post in the new structure then the terms and conditions will, however be relevant to that post and the wider terms of the host employer.
329	Project	Cardiff	Staff Portal	Would there be a possibility of meeting with staff from Worcestershire to get an understanding of how their licensing process works?	The project has already had discussion with the Worcester regulatory service on a range of issues. The project team would propose that the Group Leaders would continue that dialogue on the service specific matters and also engage with London boroughs and other larger areas to establish best practice.
330	Service	Cardiff	Staff Portal	Why has Licensing been put under Neighbourhood Services when it predominately concerns the commercial sector?	Licensing is inextricably linked to most aspects of Trading standards and Environmental Health and as such impacts upon both the commercial sector and local communities. If the project proceeds much of the detail around service provision will need to be developed and finalised by the new management team in 2015, as they work through the TOM and service demands.. Officers from all levels will be encouraged to participate in that process and as such can influence the best location for the Licensing service.
331	Service	Cardiff	Staff Portal	My department (Licensing) currently self finances (around 85%) (this information was explained to Atkins during the meetings)itself with an income from Licensing Premises/People etc as we are not allowed to make a profit, moving Licensing would not benefit the collaboration, (extra revenue can be sought but again only to the amount that it costs to run Licensing regardless of which department Licensing sits) Can we not stay within Cardiff Council under a different name?	The suggestion of Licensing staying within the authorities while Environmental Health and Trading Standards move into a collaborative arrangement, fails to acknowledge that the three disciplines are inextricably linked after working so closely in the unitary authorities for the last 18 years. Indeed, it can be asserted that Licensing is central to all the functions undertaken by Regulatory Services. Breaking these bonds and diminishing the support between the various disciplines would be a backward step that would isolate Licensing particularly when over time other service areas could be brought into scope of the arrangement and be delivered regionally.

332	Service	Cardiff	Staff Portal	<p>Licensing in Cardiff works a shift pattern of nights, evenings and weekends, but the other two Local Authorities only work days so out of hours is worked on a need only basis. This information is not in the report and during the last 2 meetings it was evident that Atkins had not explained this information to anyone. We work these shifts as Cardiff is a 24 hour City with visitors from all over the world so we as Licensing Enforcement Officers provide this coverage so that the Citizens and visitors of Cardiff have a presence when they are there, if we were to join with the other local authorities would this stop? The work that is completed (such as South Wales Police, VOSA, UK Border Forces etc and general patrolling) during these hours is vital to a thriving 24 hour Capital City. We do a lot of regular enforcement during these hours which benefits the public/visitors for this to stop after so many years would put the public at risk.</p>	<p>This concern is noted and will be considered by the new management team as a key issue to resolve, should a decision be made to pursue the collaborative approach. The model is intended to provide as comprehensive a service as possible within the resource available.</p>
333	HR	Cardiff	Staff Portal	<p>TUPE, can the documents be sent out as to what this is in detail, rules, regulations etc? E.G. when TUPE transfer happens how long can I keep my conditions? Do I have to take the new conditions if they are imposed or keep my existing ones? If I can keep my existing conditions can I keep them forever or is there a time limit? Can jobs be evaluated after TUPE? Can the TUPE documents be sent around to everyone and maybe even a face to face meeting explaining TUPE where we can ask questions about the documents etc. Some of this was explained at the meeting but it is very difficult to understand.</p>	<p>Depending on a decision being made in October to progress the collaboration project, staff workshops in relation to TUPE will be held covering the process and points raised in this question. This will be a necessity as part of the TUPE consultation process and will need to be undertaken by both the transferee Councils and the host employing Council.</p> <p>The basic principle is that all contractual terms and conditions of employment will be protected as part of the transfer to the host employer in April 2015. This may not include organisational specific policies and procedures and discretionary terms. A complete stocktake of all terms and conditions will be undertaken as part of the pre-transfer consultation process.</p> <p>After the transfer process, consultation will begin in relation to the restructuring of the service to move to the new operating model. In some cases this will involve the appointment of staff to the same or similar roles (in which case TUPE protection will continue. Where staff are offered appointment to significantly different roles then the new terms and conditions will apply.</p>

				<p>When we are TUPE'd over please can it be written in that we are still able to apply for jobs within Cardiff Council and our pensions and service to carry over as well should we be successful in being offered a position? I ask as me along with many other staff would prefer to stay with Cardiff Council but if this is not an option then the availability(?) to still apply for jobs etc would be appreciated, as normal when you transfer out you would not be allowed to apply for jobs in Cardiff Council as they are for internal applicants only.</p>	<p>A decision about which Council is to be the host employing authority will only be made in September/October 2014.</p> <p>Clearly any employee in the new service (should the project progress) will be able to apply for posts advertised externally within the transferee Councils (or any other local authority) after a TUPE transfer in April 2015.</p> <p>Unfortunately however Council specific redeployment arrangements would not be protected under TUPE. Your pension arrangements will remain the same as this will still be Local Government pension and your service will be continuous as protected by TUPE regulations.</p>
334	HR	Cardiff	Staff Portal	<p>At the meeting it was said that we would be TUPE'd over, then we could have to apply for the jobs available. Will this process be managed by an independent person/company? Also will the jobs be ring-fenced, for example Trading Standards employees applying for Trading Standards jobs and Licensing Enforcement Officers applying for Licensing Enforcement jobs etc?</p>	<p>The newly appointed Management team would be responsible for staff appointments within the new service and once the TUPE transfer has been complete.</p> <p>This process for appointment has not been detailed, and will only be detailed should the project progress. The project will consult with the Trade Union Forum to ensure that the most appropriate process is put in place.</p> <p>It will, however be based on sound and transparent principles to be agreed with the trade unions. For some employees this may include "job matching" i.e. appointment to the same or similar post and for others it may include a competitive selection process. All posts will be ring-fenced to existing staff (although the size and shape of the ring fences will need to be determined in consultation with the trade unions. Staff will be supported through the process</p>
335	HR	Cardiff	Staff Portal		

336	HR	Cardiff	Staff Portal	<p>There is mention in the report and at the meeting that we will need to apply for jobs but it does not state what they are or show the job descriptions and person specs. Please can these be identified and sent out to all concerned? This was also noted in the letter from Cllr Mitchell. I understand that the host authority has to be chosen first but for staff to make an informed decision as to leave now or stay then that information is vital to make an informed decision. We were advised that if we wanted to go for VS we would need to apply for it by the 12th September 2014. At the meeting we were told that this was not the case and that we could apply for VS and get the full finance package as normal even if we applied after the 12th September. Please can this be confirmed.</p>	<p>Should the project proceed, Job Descriptions will be created shortly after the appointment of the Head of Service. Work will commence on drafting the detailed job descriptions and person specifications once a decision has been made about the project in September/October. The work will be done in consultation with staff.</p> <p>Consideration of voluntary severance (and the merits of individual applications) can only be given once we know whether the project is proceeding and subject to any pertinent legal considerations. The unions and the project team are, however keen to be able to agree a common sense position on this (subject to any legal considerations and supported by an appropriate business case).</p> <p>In relation to voluntary severance in general (not relating to the collaboration project) employees should follow their current employers normal processes. There is no deadline of 12th September for this.</p>
337	HR	Cardiff	Staff Portal	<p>We are currently on a 36 hour week which will return to 37 hours from 1st April 2015. I have been told the Vale are currently working a 35 hour week. Will we be going to a 35 hour week or staying on a 37 hour week?</p>	<p>The Vale operates a 37 hour working week.</p>
338	HR	Cardiff	Staff Portal	<p>We currently have the potential to have a 1% pay rise or more if it is negotiated. If we TUPE over will we get the back pay or more if agreed?</p>	<p>The commitment to the national pay award will be protected as part of any TUPE arrangement including any entitlement to back pay.</p>
339	Service	Cardiff	Staff Portal	<p>The slide show shows licensing under neighbourhood team (slide 8) but the commercial team (slide 11) section is where licensing have been placed. Which section are Licensing in and what will be their full functions? I know this can't be decided until the Host Authority is chosen but for staff to make an informed decision on what to do we need to know what jobs are available and what those jobs entail.</p>	<p>Licensing is inextricably linked to most aspects of Trading standards and Environmental Health and as such impacts upon both the commercial sector and local communities. If the project proceeds much of the detail around service provision will need to be developed and finalised by the new management team in 2015, as they work through the TOM and service demands. Officers from all levels will be encouraged to participate in that process and as such can influence the best location for the Licensing service.</p>

340	Service	Cardiff	Staff Portal	<p>In the new structure chart there are no Licensing Enforcement Officers only Licensing Officers and Enforcement Officers. We have also been told at the meeting that Licensing is too complex to change all across the 3 Council's. If that is the case why does the structure chart not reflect that the Licensing Enforcement Officers are still in place? If the Licensing function is too complex then they should still be in the new structure shown in the slide show continuing with the statutory role/work that they currently do?</p>	<p>The structure chart does reflect that the role of the Licensing enforcement officer are retained. If the project proceeds much of the detail around service provision will need to be developed and finalised by the new management team in 2015.</p>
341	HR	Cardiff	Staff Portal	<p>In the original Atkins report, there is mention of a small number of posts being employed on fixed term contracts, however there is no further mention of this in the update to the report containing the revised structure chart. Can you please advise if it is intended that all posts within the revised structure will be on permanent contracts?</p>	<p>The 178 posts shown in the revised "indicative" structure at in Appendix B are all permanent FTE positions.</p>

342	HR	Cardiff	Staff Portal	<p>Presumably it is intended that all staff will eventually transfer over to Vale of Glamorgan terms and conditions. With this in mind it would be very helpful if staff could be informed of what these T+Cs are in order to make decisions about their future. Of particular concern are things like, leave entitlement, flexi time and work/life balance policies, hours of work, VS schemes and redundancy and redeployment policies and schemes. It would also be useful to have information on salary scales.</p>	<p>Staff will transfer with their current contractual terms and conditions. The basic principle is that all contractual terms and conditions of employment will be protected as part of the transfer to the host employer in April 2015. This may not include organisational specific policies and procedures and discretionary terms.</p> <p>A complete stocktake of all terms and conditions will be undertaken as part of the pre-transfer consultation process.</p> <p>A stock take of terms and conditions will be undertaken as part of the TUPE consultation process. Working arrangements in the proposed structure will need to be reviewed to meet service needs and will be subject to consultation with staff and unions.</p> <p>After the transfer process, consultation will begin in relation to the restructuring of the service to move to the new operating model. In some cases this will involve the appointment of staff to the same or similar roles (in which case TUPE protection will continue. Where staff are offered appointment to significantly different roles then the new terms and conditions will apply.</p> <p>The salary grades of posts will be determined following a job evaluation exercise managed by the host employer.</p>
343	HR	Cardiff	Staff Portal	<p>If staff become redundant once transferred to the Vale will their service at Cardiff Council be counted as continuous service for redundancy purposes or will service be counted from the point they transfer to the Vale?</p>	<p>Part of the protection provisions of TUPE include the protection of continuous service. This will include protection for the purposes of any redundancy situation.</p>
344	HR	Cardiff	Staff Portal	<p>What redeployment opportunities will be available to Cardiff staff who have transferred to the Vale and subsequently become redundant? If staff are protected for a certain period under TUPE, will this mean that Cardiff staff will have the benefit of entering Cardiff's redeployment pool, and benefitting from Cardiff's redundancy package? If so, how long will this last?</p>	<p>A decision about which Council is to be the host employing authority will only be made in September/October 2014.</p> <p>Clearly any employee in the new service (should the project progress) will be able to apply for posts advertised externally within the transferee Councils (or any other local authority) after a TUPE transfer in April 2015.</p> <p>Unfortunately however Council specific redeployment arrangements would not be protected under TUPE</p>

345	HR	Cardiff	Staff Portal	If staff are made to apply for a post in the Vale and are successful, will this mean they are recruited on the Vale's T+C's and will no longer be protected by TUPE	After the transfer process, consultation will begin in relation to the restructuring of the service to move to the new operating model. In some cases this will involve the appointment of staff to the same or similar roles (in which case TUPE protection will continue. Where staff are offered appointment to significantly different roles then the new terms and conditions will apply.
346	HR	Cardiff	Staff Portal	If, as indicated at one of the staff engagement meetings, staff are employed in a similar role they are entitled to keep their existing T+C's, however the employing authority can negotiate changes to these after one year. Is it true that if no agreement can be reached, the employing authority have the right to dismiss the member of staff?	<p>After the transfer process, consultation will begin in relation to the restructuring of the service to move to the new operating model. In some cases this will involve the appointment of staff to the same or similar roles (in which case TUPE protection will continue. Where staff are offered appointment to significantly different roles then the new terms and conditions will apply.</p> <p>The basic principle is that all contractual terms and conditions of employment will be protected as part of the transfer to the host employer (including continuous service). This may not include organisational specific policies and procedures and discretionary terms.</p> <p>There is clearly a commitment across the three authorities to affording protection under TUPE where employees are appointed to the same or similar roles. Clearly however any employer may need to negotiate changes to posts at any point subject to the economic and organisational business needs at the time</p>
347	HR	Cardiff	Staff Portal	What would happen if staff inscope refused to agree to a transfer to the Vale? Will they be made redundant from Cardiff and enter the redeployment pool?	The basic principle of TUPE is that the post remains albeit the employer changes. There would be no redundancy in the circumstance as described in the question.
348	HR	Cardiff	Staff Portal	If staff were successful in obtaining a position in the new structure but later decided they had made the wrong decision, could former Cardiff staff be eligible to apply for staff vacancies in Cardiff or would they be restricted to the Vale only?	<p>A decision about which Council is to be the host employing authority will only be made in September/October 2014.</p> <p>Clearly any employee in the new service (should the project progress) will be able to apply for posts advertised externally within the transferee Councils (or any other local authority) after a TUPE transfer in April 2015.</p> <p>Unfortunately however Council specific redeployment arrangements would not be protected under TUPE</p>

349	HR	Cardiff	Staff Portal	If the move to the Vale places additional expense on staff in terms of travelling to and from work, will reimbursement be payable for additional travel expenses?	The decision about host employer will only be made in September/October. It is understood however that Cardiff Council and Bridgend Council do not have an excess travel policy, therefore this will not be protected. Staff will however claim the relevant mileage rate for travel throughout the course of their work
350	Project	Cardiff	Staff Portal	Can we see more evidence than that provided in the report on how the regionalisation of Worcestershire Regulatory Service worked? There is very limited information in the report.	Much of the information you have requested is available from the Worcestershire Regulatory Services website. www.worcsregservices.gov.uk
351	HR	Cardiff	Staff Portal	I understand at this stage that you're unable to provide job descriptions but it would be really helpful for staff to see some sort of outline of all the different roles together with an indication of grades so staff can see how they could fit into the new structure and be better informed when making decisions about their future.	Should the project proceed, Job Descriptions will be created shortly after the appointment of the Head of Service. Work will commence on drafting the detailed job descriptions and person specifications once a decision has been made about the project in September/October. This work will be done in consultation with staff. An outline of roles within the new structure were set out in the last staff briefing session in August.
352	Service	Cardiff	Staff Portal	How can the proposed structure with the balance of 18 commercial services officers and 28 commercial technical officers deliver the high risk food inspection programme + other high risk food activities plus health + safety and trading standards activities?	In addition to the officers located within the Commercial Services division, there are a further 6 Commercial services officers and 3 Commercial service technical officers located in the Enterprise and specialist services division. It is envisaged at this stage that the latter group would undertake an inspection role at non-retail premises across the region. The need to ensure that the Environmental Health and Trading standards duties are recognised, however, the financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision in Cardiff and measures may need to be considered that could result in a significant change in service delivery.
353	Service	Cardiff	Staff Portal	Can you confirm that the commercial officer posts will not be multi-disciplinary but will be specialist i.e. Trading Standards or Food Safety or Health + Safety but not expected to do all 3?	The new service will need qualified staff to utilise as much of their training as possible and will seek to support staff through the TOM specialist skills and disciplines, in fact this model offers more opportunity to do so, if only simply through greater numbers. Routine work will be done by the vast majority with specialist skills and fully qualified staff, dependent on their role within the new TOM. It is not therefore intended to train EHO's to undertake core TSO functions and vice versa. In the new service there is a need for officers to exhibit a broader range of skills and knowledge to reflect the demands of the job and new structure.

354	Service	Cardiff	Staff Portal	Can you confirm that the commercial tech officer posts will be expected to be multi-disciplinary but only low risk activities and sampling?	The Commercial Service technical officers are likely to undertake activities such as those identified above, but the exact detail associated with these roles will be the subject of further consultation with interested parties to ensure that the service delivers as comprehensive range of functions as possible
355	HR	Cardiff	Staff Portal	Can you confirm that if recruited to a new post with more or less the same activities as currently, TUPE means that you remain on your current (as now) terms + conditions (including salary) regardless of the job evaluation outcome for that post?	After the transfer process, consultation will begin in relation to the restructuring of the service to move to the new operating model. In some cases this will involve the appointment of staff to the same or similar roles (in which case TUPE protection will continue. Where staff are offered appointment to significantly different roles then the new terms and conditions will apply
356	HR	Cardiff	Staff Portal	Can you confirm that Team Leader posts will not be recruited to until September 2015?	The aim is to begin consultation in relation to the proposed new structure shortly after the transfer in April 2015 with a view to appointing to the new posts by September 2015. This will clearly depend on the outcomes from the consultation process.
357	Service	Cardiff	Staff Portal	<p>The figure quoted for HMO's (Houses in Multiple Occupation) in Cardiff is 4,000; this is the number that we are aware of. The figure from a house condition survey and the Welsh Government is nearly double this, and the estimated number of properties in the private rented sector in Cardiff alone is 31,000 with 19,500 landlords.</p> <p>Are the appendices flawed as they misrepresent the figures in relation to Private Sector Housing?</p>	<p>The figures contained in the Atkins report were provided by the officer working group (Group Leaders) and represent our understanding of the at the time of publication. The number of HMO might increase if further additional licensing schemes are declared. At this stage, we cannot comment upon the findings of other surveys, but should they prove to be accurate, the resource implications would need to be considered.</p> <p>The number of landlords identified will be considered as part of the Welsh Government proposals to licence landlords as well as the current requirements to licence properties.</p>
358	Service	Cardiff	Staff Portal	<p>The Equality Impact Assessment states that 10% of FTE's will be lost - this appears incorrect as the total FTE's in the Assessment is quoted as 274 whilst the current proposal has a total of 168 = 36% reduction.</p> <p>What are the correct figures?</p>	Based on staffing levels at July 2014 the number of potential redundancies would be approximately 26 FTE. It is expected that this figure will further reduce on implementation of the new service model as a result of the continuing approach to vacancy management and based on the revised organisational structure at page 40 of Appendix B. Members of staff will be aware, however, that further savings may, be necessary following the implementation of the new service.

359	Project	Cardiff	Staff Portal	<p>Cardiff has, by far, the greatest number of service requests from the biggest population, the most varied number of issues, the largest number of staff (triple that of the other 2 authorities) covering the largest number of specialist areas.</p> <p>Why is Cardiff not being proposed as the host authority? The proposal for the Vale seems not to take any of this into account.</p>	<p>The decision upon the Host Employing Authority will be made in September. The Cabinet report contains details of the assessment process undertaken and the rationale for proposing the Vale of Glamorgan as host. The size of the Authority and the associated workload would not automatically advance Cardiff as the host employer.</p>
360	Service	Cardiff	Staff Portal	<p>Environmental Health Officers (EHO's) are professionally qualified individuals with their own representative body and are nationally recognised.</p> <p>Does the proposal de-value this professional status and will less qualified staff carry out professional tasks?</p>	<p>There is no intention to devalue the professional status of any of the service disciplines. The shared service offers an opportunity to revise the structure of the service in the three councils and ensure that appropriately qualified officers deal with appropriate levels of risk. Based on the analysis undertaken by Atkins, it has been determined that at present there are a number of roles where work is being undertaken by more senior officers than is required. The proposed structure and associated economies of scale offer the opportunity to revisit this.</p>
361	HR	Cardiff	Staff Portal	<p>Will Cardiff staff transferring to the Vale be required to accept lower grades with lower pay and inferior work life balance conditions.</p>	<p>All aspects of employment will be consulted upon as part of the TUPE consultations, once the host employer is agreed</p>
362	Project	Cardiff	Staff Portal	<p>The report indicates that the new central officers (The Alps Depot) is good for transport links. However this appears based on car usage, while public transport links are poor.</p> <p>Has the impact of travel time and cost been considered for lower graded staff required to transfer, and will there be pressure to improve transport links?</p>	<p>The Cabinet report indicates that the shared service functions would be delivered from a mix of customer-facing "satellite" offices located in each Council area and from a centrally located office. The 'satellite' locations will be established in each of the three council areas to provide customer-facing services on a local basis and also provide work spaces for employees of the shared service to work from. Additionally, office accommodation will be required for a central team of officers who will manage and administrate the shared service. The final decision upon the location of these offices has yet to be made and the implications for staff will be taken into consideration when those decisions are taken.</p>
363	Project	Cardiff	Staff Portal	<p>The Williams report proposes amalgamation with the Vale.</p> <p>Should this project not be put on hold to await the outcome rather than rush through something that will leave Cardiff and its staff in a less favourable position?</p>	<p>The Williams report remains the subject of consultation with Welsh Government and implementation of any its recommendations are unlikely to be implemented in the short term. This proposal has been put forward to deal with the current financial pressures while maintaining service delivery and resilience.</p>

364	Service	Cardiff	Staff Portal	<p>Atkins Appendix C (pg 122) indicates that Cardiff undertaken 'High Hedges under ASB act'. Appendix C Delegated functions goes on to show that the ASB Act 2003 is an Executive function delegated to Joint Committee.</p> <p>There is no indication of how the High Hedges function will be undertaken, and I wish this to be clarified.</p>	<p>The intention is to develop a core service model. If the proposal is implemented the actions associated with adopting the target operating model will be progressed. It is at point that the specific, specialist functions will be assessed and consideration given to how they will be discharged.</p>
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Regionalising Regulatory Services - Comments

Ref	Workstrea	Authority	Source	Comment
1	HR	Cardiff	Staff Portal	<p>I have looked at the Collaboration report and find it hard to believe the way that the packages of redundancy has been worked out, and feel that it is quite Ageist.</p> <p>I have worked for the Council for 21 years. My age next year will be just short of 55 years of age and because of this I will be penalised by getting a lesser amount than someone who is over 55 and may have worked for the Council for say halve of that time and will get more than twice as much me.</p>
2	Service	Cardiff	Staff Portal	<ul style="list-style-type: none"> • Out of Hours Noise service <p>City and County of Cardiff Council currently operate a Night Time Noise Service which operates from Thursday through to Sunday to respond to complaints from Cardiff residents of any noise complaints. This service has been running since August 2008 and has been highly successful in dealing with noise at the time, particularly from one off complaints and with cases where all the noise happens out of hours. On average Noise & Air team receive 11, 000 calls out of hours relating to noise. Within Atkins Target Operating Module (page 80, "Housing and Environmental Protection") it clearly proposes a "Reduction in out of hours services. This approach should be set out in a noise Policy to be agreed by the Joint Committee".</p> <p>The report also goes on to state that, " The provision of an out of hours service will be an option for the whole service but will probably be subject to separate agreement and additional cost beyond the basic cost. Cardiff Council may consider reducing the current service to reduce cost. Out of hours services should adopt flexible working arrangements rather than relying on overtime payments."</p>

3	Service	Cardiff	Staff Portal	<p>Expertise and specialism V. generalists.</p> <p>The target operating model proposes to split Pollution Control to “Neighbourhood Services” and “Enterprise and Specialist Services”. “Neighbourhood Services” would deal with Housing and Pollution Control Complaints whilst “Enterprise and specialist Services” would deal with Contaminated land, Environmental Permitting and Monitoring activities. It is intended to train more Housing officers to deal with noise and Air complaints and vice versa. Almost all of Cardiff’s Noise and Air team hold Certificate of competencies for Environmental noise monitoring. To undertake such training for all Housing would cost £1100 per person. Similarly there will be costs to train officers in aspects of Housing Enforcement. The synergies within the existing Pollution Control section at Cardiff rolled out over the 3 local authority areas would provide greater resilience, reduce the training costs of the proposed structure. There would be greater opportunity for professional development, better office retention and job satisfaction. This was a strong opinion that was voiced during consultation with staff which seems to be overlooked, or given no weight. There are certainly other nuisance (other than Noise, air, odour, smoke) issues such as accumulations, prevention of damage by pests, nuisance from animals and premises that could be dealt with by Pollution Control which would avoid the requirement to generalise and retrain officers.</p> <p>It is not clear where Air Quality would be delivered. Again I would reiterate that Cardiff has 4 Air quality Management Areas and the function is delivered from within Pollution Control. I would propose that all of pollution be contained with Neighbourhood Services to maintain a high quality specialist Service, as currently is the case in Cardiff.</p>
4	HR	Cardiff	Staff Portal	<p>There appears to be some discrepancy over the number of posts that will be reduced/ lost as a result of the project. Within App D, draft EIA, it is detailed that a reduction of 10% FTE is likely as a result of the collaboration. The report details the current FTE (exc Temporary and vacant posts) is 265. The initial structure presented in the Atkins report details a total number of FTE of 189, and the amended structure in supplementary report details 165. These reductions are significantly greater than 10%. Further on page 192 of the main Atkins report it states in the table under Travel cost savings and assumptions column ‘total travel cost of £367k reduced by 19% (in line with peripatetic headcount reduction), again another discrepancy on the reduction of staff.</p>

5	Service	Cardiff	Staff Portal	In section 4.3.5 on page 35 of the main Atkins report where it details the key assumptions of the collaboration and change option the report states 'The key benefits are realised from reduced employment costs and a reduction in travel costs. Given the potential for staff to be working in Cardiff, Bridgend and the Vale possibly all in one day depending on the nature of any visits then surely there is a potential risk that significant travel costs will be incurred. Therefore in establishing the structure of the teams, consideration of the geographical setting needs to be fully considered and detailed.
6	Service	Cardiff	Staff Portal	Further currently in Cardiff, officers in Pollution Control and Housing have access to pool cars to undertake site visits, and as such the majority of officers do not make mileage claims. Consideration on continued and expansion on the provision of pool cars and whether this is more economical over mileage costs should be considered.
7	Service	Cardiff	Staff Portal	The above also ties in to establishing central office(s) that have excellent transportation links. Details on where teams will be based needs to be included in order to give staff an understanding as to where they could potentially be based in order to make any necessary travel arrangements. Some officers do not have access to a vehicle for commuting as the central location of City Hall and use of pool cars means that a number of officers rely on public transport to get to work. Locating officers in locations with poor transport links could mean that officers will be forced to purchase a secondary vehicle for commuting/ work purposes.
8	Service	Cardiff	Staff Portal	From the Atkins report, TOM action 25 , details that 'Flexible and mobile working should be embedded by ensuring it is integral in the terms and conditions of service and by investment in mobile working systems as part of the start up process'. From the text supporting this action it is apparent that this is to include home working especially as the costs for setting up home working for officers has been considered (£325k). Whilst it is appreciated that home working has many benefits, consideration must be made as to whether all officers have the capability for working from home. For instance I currently do not have a dedicated room in my own house from which I can work from, and would be reliant on having to work at a dining table should home working become a requirement. This may not be conducive for efficient working for a large number of staff
9	Service	Cardiff	Staff Portal	What is alarming to me is that nobody within Trading Standards was aware of the Consumer Advice tender, which has the potential to not only affect us in Cardiff but to the collaboration as a whole.

13	Service	Cardiff	Staff Portal	The current establishment of the contaminated land team in Cardiff is incorrect as detailed in Appendix M of the Supplementary Atkins report; it states that one of the Senior Technical Officers is a temporary position. This post was made permanent in July 2012, and therefore should be reflected as such. A further senior technical officer for Environmental Permitting should also be included, as this position was transferred to the Contaminated Land Team from the Noise and Air Team
14	Service	Cardiff	Staff Portal	<p>In terms of the proposed new structure there seems a bit of confusion on what elements of Environmental Protection will be included in the Enterprise & Specialist Services as detailed in the Atkins Report (App A). Some examples include</p> <ul style="list-style-type: none"> • The Box on page 127 it indicates that this will include Contam Land (CL), Env Permitting, noise water and air quality monitoring • Page 83 details CL, Env Permitting and monitoring; • Pg 69 details that CL, Env Permitting and air quality sits in E&SS whilst water quality sits within both neighbourhood and commercial services; <p>From the above it can be seen that there is some confusion over what elements will be included in the final structure and thus it would appear that no final decision has been made on how the service is to be set up. This makes it difficult for staff to assess whether the proposals are positive as staff are unclear as to where their current roles fit.</p>
15	Service	Cardiff	Staff Portal	It is also not clear as to whether the 4 technical specialist officers identified in the structure are to deal with all elements of this or whether there is more specialist/ dedicated officers within the team, i.e., 2 dedicated CL officers and 2 dedicated Env Permitting officers? The initial structure in the main Atkins Report (App A) details these staff as Technical Officers - -Contaminated Land, yet the final draft structure in App B, the supplementary Atkins report just lists 4 Technical Officers.
16	Service	Cardiff	Staff Portal	Given the complexity and technical requirements for these roles in terms of both contaminated land and permitting, it is my view that it will be imperative that dedicated specialist technical officers are maintained to discharge these functions. It is my opinion that removing such expertise will weaken the performance of the new Regulatory Body, which should be seen as a centre of excellence in such technical fields, given the potential staff resources and expertise available.

17	Service	Cardiff	Staff Portal	Currently the contaminated land team undertake detailed searches on property/ land transactions in terms of providing information on historic land uses/ contamination risks. This element of work is only detailed in the individual authority assessments, and has not been detailed as part of the Specialist teams role (unless it is being grouped within the function of Contaminated Land itself) This is an important element of work which should be recognised and when taken across all three LA areas can be a substantial element of work. Further through additional advertising/ promotion of the services etc, this is potential area of where there is scope to increase the volume of work and as it is a chargeable service there is potential to increase an income stream to alleviate some costs.
18	Service	Cardiff	Staff Portal	Further recent additions to the work load of the contaminated land team in Cardiff have also not been captured, (high hedges, water monitoring at temporary events) and therefore consideration on keeping any of these roles in the specialist team should also be made.
19	Service	Cardiff	Staff Portal	<p>There is some uncertainty within the document as follows:</p> <ul style="list-style-type: none"> ☒ Page 68 of the Atkins report (Service Model) states only the 'Contaminated Land and Permitting as specialism roles' within the Specialist Services team. ☒ Page 69 of the Atkins report (Principal Functions) then states 'Contaminated Land, Permitting and Air Quality' as specialism roles within the Specialist Services team. Water Quality is divided into the both the Neighbourhood and Commercial teams on the same page. ☒ Page 80 of the Atkins report (Housing and Environmental Protection) states 'Environmental Protection staff and housing staff will form three multi-skilled teams delivering the services they currently provide with the exception of the specialist tasks relating to contaminated land, environmental permitting, and monitoring which will move to Enterprise and Specialist Services.' ☒ Page 83 of the Atkins report (Specialist Services) states 'Environmental Protection – support for the areas of Contaminated Land, Environmental Permitting and monitoring activities (although this latter function could go to the Analyst Service).' ☒ Page 127 of the Atkins report (Appendix D - Overview of New Regulatory Functions) states 'Contaminated land, noise, water and air monitoring' fit within the Specialist Services team. ☒ Page 148 of the Atkins report (Appendix H - Risk Matrix of Principle Areas of Regulation, Environmental Health, Food Safety) includes Private Water Supplies.

20	Service	Cardiff	Staff Portal	<p>As you can see the Specialist Services proposed work functions that are currently Pollution functions are not consistent throughout the Atkins document and Water Quality is placed within all three teams in the new model in different parts of the Atkins document. This creates the uncertainty that the report has fully appreciated the nature of the water quality work.</p> <p>As an experienced and qualified officer (10+ years) within water regulation for both groundwater protection with the EA and public health protection in the Council I feel I can offer some comment on the direction of this work.</p>
21	Service	Cardiff	Staff Portal	<p>Private Water Supplies is not undertaken by Food Safety in the three Councils but actually by a Pollution Control officer in each council currently and not always an EHO but rather a technical officer with a specialist background and qualifications. Water Quality generally includes Private Water Supplies, Temporary Events, Bathing Waters and Mains Water Complaints but can also include pollution incidents. The Private Water Supplies and Temporary Events duties in particular are not undertaken by a visit for water sampling alone. The Regulations require a risk assessment approach of the premises from source to tap and a process of technical interpretation of the land condition. This involves a technical and specialist understanding of key areas including geology, hydrogeology, water catchment characteristics, potential contamination sources and knowledge of water fittings and treatments to then construct a water supply risk assessment technical report. A lot of technical work takes place outside of the visit through a desktop process of technical review either side of the visit. This working process and discrete technical specialism of the Water Quality work, especially Private Water Supplies and Water Quality at Temporary Events mirrors and aligns very closely to the contaminated land duties. There are very few officers who are qualified geologists and these officers are suited for the specialist technical officer roles for water quality and contaminated land. These skills are not generic to all EH officers and so do not meet the criteria of the Neighbourhood or Commercial team a consisting of generic officers performing generic tasks such as noise nuisance and HMO visits. So to see the water quality duties spread across all three service teams in the new model creates concern.</p>

22	Service	Cardiff	Staff Portal	The specialist technical officer role, as is proposed, is placed in the Specialist Services team, where the expertise to operate the function is thought to fit within the proposed Service Model, but an alternative option is the potential to consider having technical specialist officer(s) for water quality, contaminated land, air quality and permitting based within the Neighbourhood team – aligned to the current pollution functions. This other option has potential to create a more resilient service for these individual specialist functions and development opportunities for generic officers to work alongside specialist officers and vice versa. I strongly believe Page 127 of the Atkins report provides the best representation in the report of where Water Quality should fit – alongside contaminated land and other pollution functions such as permitting, air quality and noise.
23	Service	Cardiff	Staff Portal	I would suggest the need for clearer articulation of where the water quality work fits further down the line as I have discussed above to ensure this work area can be achieved with greater confidence in the delivery from competent specialist officers, perhaps based in teams with generic officers (noise and housing) for a far more resilient service.
24	Project	Vale	Staff Portal	I suggest that the Pest Control Teams from merging councils meet to discuss the future of the running and service of the pest control division from those that know it best to discuss how things will be going forward. Do you think this is sensible?
55	Service	Vale	Staff Portal	I have the following comments regarding the proposed collaboration and thank you for taking on board my comment regarding length of notice for meetings. I would also like to say that in the current climate things cannot stay the same and fully support the need for change but feel it needs to be done with the involvement of staff and members. I attended both committees and felt at times that the members were being railroad to make a decision on something that they had little time to study. It would have also been beneficial if a member of staff would have been allowed to speak to the committee about how the changed service would differ from the service provided now. I felt it needed to be made clear that only statutory functions will be carried out.
56	Service	Vale	Staff Portal	In the proposed structure Atkins are proposing an income generating team I would be interested to see where this income is going to come from as licensing can only recover the cost of what the licence costs to administer and no more. Our pest control service is already being undercut by private companies so can't see where an income would be generated here. There is also a conflict of interest issue if we took on contract for food businesses.

57	Project	Vale	Staff Portal	As we are all going to come under one human resources team it would also make sense to use one legal team instead of 3 to prevent conflicting advice. Our team has a member of staff who works both for Cardiff and the vale and is currently having problems in that our legal team ask for certain conditions or criteria where Cardiff legal team don't. This is confusing for landlords who have properties in both areas.
58	Service	Vale	Staff Portal	It is essential that members and also the service users are aware that there will be implications regarding the service that they get at the moment and the service they will be getting. I think it should be made clear to everyone that only statutory functions will be carried out.
59	Project	Vale	Staff Portal	Still differences in way authorities are being treated Cardiff have until 5th Sept to make comments but we have until 22nd august. The reason given is more staff in Cardiff. The aim of this is to provide one service but we are being treated differently. We should all be given the same documents at the same time and have the same timescales to respond i.e. an level playing field.
60	Project	Vale	Staff Portal	Staff morale is already low so it doesn't help when the leader of the council , who is one of the driving forces behind the collabration is quoted as saying a merger with Cardiff not necessary, affordable or required at this time South Wales Echo 24/7/14 in response to the Williams Report.
61	HR	Vale	Staff Portal	Over the last 2-3 years when posts have become vacant in certain areas of public protection the majority of posts have either not been filled or have been filled with either agency staff or staff on temporary contracts the reasoning behind this I believe was to try to provide some security for permanent members of staff. Whilst the Vale has done this I am lead to believe that the other authorities have appointed staff on permanent contracts. It seems unfair that staff who have worked hard to maintain a service may end up without a job due to the inconsistencies of recruitment between the authorities. I would remind you that at one of the committee meetings members commented on the excellence of the service provided by the public protection department.
106	Project	Vale	Staff Briefing	It would be useful to gather similar posts across the three authorities in workshops
107	Project	Vale	Staff Briefing	14 months is a long time to wait, which will impact staff morale.
45		Vale	Non Union Staff Scrutiny Questions	It is obvious that the conclusion and recommendations of The Atkins Report are that the 'Collaboration and Change' option should be actioned. However in light of the Williams Report, that when implemented will result in significant change, would it not be prudent to note the Financial Appraisal at 4.3.7 (p.7 of Appendix B) that states; 'The collaborate only option provides the greatest return on investment over a 5 year period.....' As in 5 years' time the Williams Report may have been, or be in the process of being implemented.

46	ICT	Vale	Non Union Staff Scrutiny Questions	If the Councils pursue 'Collaboration and Change' the investment that is proposed are costs that are disproportionately used to pay redundancies, paying for job losses is hardly an investment, and IT costs. The IT costs in 2014/15 are £530k, an in 2015/16 are £317, and in a bid to form a mobile, peripatetic, workforce there are additional homeworking costs of £242k. IT and homeworking alone for 2014-2016 is £1089.364k. Is heavy investment in IT, which has a track record of failure, the NHS and BBC just 2 very notable failed organisations in terms of IT, such a wise investment?
47	Finance	Vale	Non Union Staff Scrutiny Questions	Also noting even if a large number of staff utilise mobile working will the Vale Council still be left with the eye-watering indirect costs, and commitments to buildings, to be found on p.12 of Appendix B. The actual indirect costs in table 4.5.4 show Vale buildings cost two and half that of Bridgend and HR in the Vale is over four and half times that of Bridgend!
48	Finance	Vale	Non Union Staff Scrutiny Questions	With regard to the Supplementary Appendix B the vast collection of tables and figures are mind boggling to say the least.
49	HR	Vale	Non Union Staff Scrutiny Questions	However 'Staff to Transfer Totals as at 08.07.14 (p.26) proves interesting reading and poses puzzling questions. Why are the 'In Scope Posts to Transfer' so variable, as in percentage of existing posts that exist now compared to percentage of posts that will for better words go over into any potential structure; Bridgend 93.5% Cardiff 82.4% Vale 77% It appears that Vale staff, and subsequently service provision, take a disproportionate 'hit' in terms of job losses a situation fuelled by a disproportionate number of vacant and temporary posts, a position due in large part by long term post freezes and the utilisation of temporary contracts. The practice of not filling posts, or if it does occur then on a temporary basis, has gone on in the Vale whilst other authorities, such as Cardiff Trading Standards Dept., have created and filled permanent posts.
50	Project	Vale	Non Union Staff Scrutiny Questions	Above are just a few issues and facts extracted in extremely limited time from a lengthy, complex and contradictory Report that totals 319 pages.

62	Service	Vale	Non Union Staff Scrutiny Questions	The costly Atkins Report in general is inaccurate and far from self-explanatory, for example at p.131 it is stated, under the 'Model for Collaboration.....' that there are 9.5 FTE Pollution staff, at its maximum the number of staff in Pollution has been 6 FTE to cover all aspects of noise, contaminated land, planning consultations, water quality, licensing consultations, nuisance and air quality. No explanation, breakdown, has been given on how this figure of 9.5 FTE has been calculated and reached.
63	Service	Vale	Non Union Staff Scrutiny Questions	At p.202 the Atkins Report 'Vale of Glamorgan Current Establishment' states that the Pollution Team consists of the following: Team Leader – accurate but post is empty and frozen Pollution Officer- this is not accurate there has not been a Pollution Officer in the team for some time. EHO (consultation)- the term consultation bears no meaning and had no relevance to the work being done in general by the Team. Currently the team consists of 2 EHOs, that have been in post sometime, a temporary technical officer and an agency EHO. A team of 2 permanent staff and 2 temporary staff when in 2005 the team was 6 with a seasonal addition of 1, a total of 7. Above are just two brief examples of the inaccuracies and inconsistencies to be found throughout the Atkins Report
64	HR	Vale	Non Union Staff Scrutiny Questions	We accept the need to change to meet the challenges of the financial cuts being placed on the Council , but there is concern that proposal are be push through without the opportunity for proper consultation with staff who will be significantly affected by the proposal.
65	HR	Vale	Non Union Staff Scrutiny Questions	While some but not all managers and frontline staff were involved with several consultation meetings with the consultants these did not give staff sufficient time to properly review the options and there was a general feeling that much of the decisions about the structure and nature of new regional regulatory service was already decided. Since these meeting the staff have had seen little no detailed information about the proposed structure. A recent staff meeting was held on the 14 July 2014 when the update was provided were the only additional information provided was the amended timescale for the proposal
66	Project	Vale	Non Union Staff Scrutiny Questions	The full report consists of some 319 pages was not released to staff until the 10am on the Thursday, 17th July 2014 and told that any comments for Scrutiny Committee must be submitted by 9am on the Monday the 21st July 2014. While this has now been extended to the 4.00pm this insufficient time allow for proper and thorough comments by front line staff and managers.

67	Service	Vale	Non Union Staff Scrutiny Questions	<p>The report clearly states that there will be a reduction in the number of staff to reduce costs, but further costs will be saved by shifting the balance of tasks by professional officers to technical officers. This proposal raises a number of concerns:</p> <p>a) This reduction in numbers of professional officers combined with greater reliance of technical officer will clearly impact standard and quality of the service provided.</p> <p>b) As the proposed structure will significantly reduce the number of professional officer compared to those currently employed would professional officer be required or have no alternative other than redundancy to accept technical officer positions ?</p> <p>c) Would Commercial Services Officer and Neighbourhood Services Officer be required to 'supervise' the technical officer positions ?</p> <p>d) Cross training for non-professional staff would according to the report (page 191) be carried out in house with no allowance for costs. The time and internal resources required to undertake such training will clearly impact on the delivery of the service.</p>
68	Service	Vale	Non Union Staff Scrutiny Questions	<p>e) In the long term the proposed structure would affect Recruitment and retention. Employees are likely to become de-motivated which could lead to a loss of expertise as experienced officers seek employment elsewhere. There would be an increase in staff turnover leading to a need for increased training and supervision of new recruits. This would put a strain on existing resources and result in reduced efficiency.</p> <p>f) Overall there is concern that the proposal will also lead to de-skilling of teams that could result in the level of service provided to residents and businesses being decreased and will ultimately put the public at greater risk.</p>

69	Service	Vale	Non Union Staff Scrutiny Questions	The proposed structure Removes the Environmental Health Officer Title and replace it with Commercial Services officer and Neighbourhood Services Officers. The current EHO post holders are required to be EHORB registered, experienced and competent to carry out a range of complex tasks and duties. The EHO's within the current Housing & Pollution teams are required to be EHORB registered (Environmental Health Officers Registration Board). An Environmental Health Officer is a protected title, and should only be used by those who have attained their EHORB registration, for which you must undertake professional exams, undergo a professional interview and complete a professional training Log Book/Portfolio. (See the following web link for further information relating to this issue http://cieh.org/media/default.aspx?id=44522) . To maintain competency, officers are also required to complete at least 20 hours continual professional development. The current Team as it stands is a highly qualified, competent and conscientious team of officers. Removal of the need for EHO title is in many officers view diluting the profession
70	Service	Vale	Non Union Staff Scrutiny Questions	The report mentioned that technical staff with appropriately qualification can undertake higher risk inspection. How would appropriately qualified officer be determined or defined ? From a Housing Perspective officer is not appropriately qualified if he/she has completed the two day HHSRS certificate. Whilst this provides an understanding of how the HHSRS is implemented it does not provide officers with sufficient knowledge and understanding of risk assessment, housing conditions or the interpretation and implementation of legislation. EHO's receive in-depth and thorough training throughout their training. Utilising non-EHO's to undertake enforcement action increases the risk of inappropriate action being taken which has the potential to leave the authority open to criticism and appeals.
71	Service	Vale	Non Union Staff Scrutiny Questions	Page 80 (Atkins Report) mentions that the out of hours service in relation to noise and that the current out of hours service in Cardiff and Bridgend be reduced and provided by a more flexible working arrangements rather than overtime payment. Such flexible working arrangement would also then disproportionate impact on the availability of officers for Housing Services particularly in the peak period for noise nuisance during the summer months.
72	Service	Vale	Non Union Staff Scrutiny Questions	The amended structure in Appendix B Page 40 when compared to Appendix F - page 130 show a further reduction in the number of officers with four less officers in Neighbourhood Service Team and other changes have also been made to the proposed structure without any explanation.
73	Service	Vale	Non Union Staff Scrutiny Questions	Having regard to the further cuts in front line services, Do we need two education and training officers or public health officer? Can four contaminated land/ Specialist Service Technical officers be justified? Would the staff be better off in front line services ?

74	Finance	Vale	Non Union Staff Scrutiny Questions	Appendix B page 12 details the indirect costs. These needs to be looked as some of the charges are significant especially in respect of Human resource, contact centre, council buildings, finance, legal when compared with Bridgend
75	Finance	Vale	Non Union Staff Scrutiny Questions	In light of the Williams Commission Report would collaboration rather than change and collaboration be more appropriate as in 5 years' time if the commission's recommendations are implement the Council's might be part of larger re-organisation so the projections for the longer term saving would be incorrect. There is no updated cost provided for the other options to allow direct comparisons
76	Service	Vale	Non Union Staff Scrutiny Questions	In addition to these above comments detailed below are corrections and comments where we believe information is missing or is incorrect: Page 9 (Atkins) – Housing and Pollution have been grouped together implying that we operate as one team while they are under the same principal officer they operate a two separate teams with two team leader. Page 63 – Activity based costing analysis the figure showed a higher proportion of officer time in noise and private sector housing was sent on casework, It is suggested that higher case work time (and therefore costs) in these area could be reduced by process redesign and flexible and mobile working. The specific and complex nature of Housing assessment and noise assessment result in greater degree of casework, whether this work is carried out while on site or at different hours would not significantly reduced the time taken to complete the case work.
77	Service	Vale	Non Union Staff Scrutiny Questions	Page 12(Atkins Report) – states that areas of highest demand should be prioritised. There is no mention of housing so does this mean that housing is not a priority? 2. In several sections of the report there is little mention of housing related services. In particular, general housing complaints/ service requests are not detailed. See pages 27 & 60 of the Atkins report. There is a general lack of detail in relation to housing services throughout the report.
78	Service	Vale	Non Union Staff Scrutiny Questions	Page 60 (Atkins Report) other than house in multiple occupation no other reference to housing, public health, housing, caravan sites or any other duties that we provide as current housing team and therefore doesn't reflect the role that we carry out.

79	Service	Vale	Non Union Staff Scrutiny Questions	Page 80 (Atkins Report) reference to Housing and Environmental Protection within Neighbourhood Services. This section makes reference to Environment Protection issues such as noise, etc., but no mention real mention of Housing related services such as provision for licencing of hmos or caravan sites. This section also mentions reducing revisits, but these are essential for us to monitor that the works have been done and allow for further enforcement.
80	Service	Vale	Non Union Staff Scrutiny Questions	Page 86 (Atkins Report) Administration it is noted that no mention is made of the need for Administrative support of Housing Service
81	Service	Vale	Non Union Staff Scrutiny Questions	Page 122 (Atkins Report) relates to current service provision. It is stated that we carry out empty homes enforcement. We also deal with reactive complaints; we proactively identify empty homes and risk assess them in addition to taking enforcement action and carrying out work in default. There is no mention that we do additional HMO licencing.
82	Service	Vale	Non Union Staff Scrutiny Questions	7. Appendix H Risk Matrix of Principal Areas of Regulation there is missing information and corrections – a. Page 148 Private Water supply regulations 2000 and reportable to DWI b. Page 153 need to add Bathing Water under legislation -Revised Bathing water directive Requirements - Keep up to date register of resorts, signage& notifications, reportable to NRW c. Page 154 – include Public Health Funerals d. licencing of residential caravan site this is important as we are now under duty to inspect. e. Disable Facilities Grants & Other Grants included when these functions are outside the scope of the proposed service. f. Holiday & Residential Caravan Sites licencing needs to be added, particular as new statutory duty for residential sites under Mobile Homes (Wales) Act. g. Private Rented sector Harassment & illegal eviction investigation needs to be included as this is undertaken by all three Council's
83	Service	Vale	Non Union Staff Scrutiny Questions	Appendix M staff structure is wrong or missing posts - Page 202 - not included Team Leader (Environment Health Housing) 0.5 Housing & 0.5 Pest Control, Pollution & Housing EHO (Consultation) should just say EHO and Pollution Officer should also be EHO.
84	Service	Vale	Non Union Staff Scrutiny Questions	Appendix B staff establishment structure wrong or missing posts – Page 33 not showing vacant posts against Team Leader Pollution Control officer, Principal Housing & Pollution Officer post missing, Two of the EHO posts in Housing & Pollution are Pollution only officers, Senior Occupational Therapist & Senior Support Officer in Housing & Pollution are part of services outside the scope of the proposal.

85	Project	Vale	Non Union Staff Scrutiny Questions	Given the enormity of the proposals contained within the Report, it is wholly unsatisfactory and unreasonable to allow staff, Elected Members and the public so little time for consideration of the contents prior to its presentation at Committee.
86	Service	Vale	Non Union Staff Scrutiny Questions	We believe that the Report falls well short of making a sound case for 'collaboration and change', and is deficient and flawed in that it; Lacks in detail Is based on assumption and guesswork rather than well founded research and evidence Contains inaccuracies and mis-representation Demonstrates a poor understanding of the practical and technical details of the services provided Is littered with factual and grammatical errors (a non-exhaustive list attached at Appendix A).
87	HR	Vale	Non Union Staff Scrutiny Questions	Despite being largely kept in the dark, Staff have engaged the process when they have had the opportunity to do so. If the case for this change is strong and justifiable why try and rush it through without proper consideration and consultation Staff have valuable input, particularly in regard to the provision of frontline services, and the process could be enhanced by their contribution.
88	Service	Vale	Non Union Staff Scrutiny Questions	Vale ongoing savings of £316000. This could be achieved without the upheaval and cost of wholesale re-organisation involved in collaboration.
89	Service	Vale	Non Union Staff Scrutiny Questions	Com Rep – point 81 'a net movement from professional to technical roles' The authors of the Report are not fully conversant with the requirements (both practical and legal) of the Service. In VOG we already operate with the bare minimum of professionally qualified staff. This 'dumbing down' can, in no way enhance the Service, it is a blatant example of saving money at all costs. It does not concur with the stated aim of improving services. i.e. a; 'secure, sustainable and efficient service with improved customer experience and enhanced satisfaction'
90	Service	Vale	Non Union Staff Scrutiny Questions	Page 11 Report – In relation to Cardiff Dogs Home 'The potential to make greater use of volunteers should be explored.' Does this suggest an improved service, or a full understanding of the work carried out by this Service
91	Service	Vale	Non Union Staff Scrutiny Questions	Page 12 Report – Regulatory Services policies at Bridgend, Cardiff and Vale of Glamorgan Councils should be reviewed and standardised as appropriate whilst taking into account local circumstances.

92	Service	Vale	Non Union Staff Scrutiny Questions	Bridgend, Cardiff and Vale of Glamorgan Councils should consider standardising their fees and charges. Consideration for example the taxi trade fees where Vale of Glamorgan Taxi trade would be required to pay higher fees in line with Cardiff. Also the impact on their vehicles consideration of requiring vehicles to be re-sprayed, the impact on customers is enormous due to standardising conditions policies etc.
93	Project	Vale	Non Union Staff Scrutiny Questions	These are huge tasks involving legal requirements, consultation processes, adoption of bylaws etc. The timescale for this is not realistic or achievable.
94	Governance	Vale	Non Union Staff Scrutiny Questions	Page 65 Report There are significant differences in licensing policy between the three councils, so it is proposed that a joint licensing administrative structure be established but that each individual council continues to deal with all licensing matters through its own Licensing Committee. How will that work? Admin staff also deal with policy all the time – and counter services.
95	Governance	Vale	Non Union Staff Scrutiny Questions	Page 66 Report A full detailed consideration of the duties, functions and responsibilities delegated to the joint committee and regionalised regulatory services chief officer, with reference to the primary and secondary legislation, will be required. How long do they think that will take?
108	Service	Cardiff	Staff Portal	Additional resilience will not be provided in Cardiff. I am of the opinion that the proposed structure will result in a dilution of specialisms particularly in the areas of Communicable Disease and Health and Safety which in turn will result in less resilience. Cardiff as a capital city deals with a far greater number of service user requests (cases and outbreaks of communicable disease, accidents and complaints), has more businesses, a greater range of business activities and a significantly larger population and wider range of ethnic diversity. These characteristics present a greater number and range risks to manage than the Vale and Bridgend. The proposed structure does not address this sufficiently.
109	Service	Cardiff	Staff Portal	The model appears to propose a generalist approach in Cardiff this will be more inefficient and lead to lower quality service which in turn will require more long term resources to address risks presented by poorer service.
110	Service	Cardiff	Staff Portal	There is too much emphasis on cost cutting and not enough on service delivery this will result in a less effective service in terms of managing public health and health and safety at work.

111	Service	Cardiff	Staff Portal	There is no identification in the structure for Communicable Disease, a public health officer is mentioned but it is not clear what the role of this officer is. Effective management of Communicable Disease requires specialist officers, contrary to popular belief this is not a service that can be effectively managed by giving the responsibility to Food Safety Officers or by placing the case load on a rota. Indeed the majority of sporadic and outbreak cases of communicable disease are not foodborne but result from person to person spread, waterborne or environmental contamination.																				
112	Service	Cardiff	Staff Portal	An agreement exists between all LAs in Wales, Public Health Wales and Welsh Government that each LA will designate a Lead Officer for Communicable Disease. In Cardiff because of the amount of communicable disease we are required to investigate this officer's role is supported by a 3/day week TO and a Team Leader who frequently works in an operational capacity when outbreaks occur and when sporadic cases are identified that present a serious public risk. You will recall the recent M. Chelonae outbreak associated with a tattooist, the Shigella case in the recycling centre and the Legionnaires' Disease cluster, there are many others which do not reach your attention because of the efficient way they are managed. If we lose this current structure all our resilience to managing communicable disease effectively will be lost. I can say this with certainty because over the last few months individual LAs have come to ask for my assistance in managing Communicable Disease effectively either as a result of significant cuts or following internal enquiries into their service delivery.																				
113	Service	Cardiff	Staff Portal	Cardiff receive almost 3 times the number of communicable disease notifications than the Vale and Bridgend, I illustrate this with one of the pathogens we investigate - Campylobacter: <table border="1"> <thead> <tr> <th></th> <th>2010</th> <th>2011</th> <th>2012</th> <th></th> </tr> </thead> <tbody> <tr> <td>☒ Cardiff</td> <td></td> <td>488</td> <td>515</td> <td>476</td> </tr> <tr> <td>☒ Vale</td> <td></td> <td>185</td> <td>191</td> <td>163</td> </tr> <tr> <td>☒ Bridgend</td> <td></td> <td>41</td> <td>195</td> <td>74</td> </tr> </tbody> </table>		2010	2011	2012		☒ Cardiff		488	515	476	☒ Vale		185	191	163	☒ Bridgend		41	195	74
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114	Service	Cardiff	Staff Portal	Cardiff has been able to lead best practice across Wales in Communicable Disease with projects like the national Cryptosporidium in Swimming pools project, the Enhanced Campylobacter surveillance and the Salmonella Enteritidis study. This proposed loss of specialism will remove our ability to excel in this area and more importantly provide a resilient and timely service for the investigation and management of communicable disease. You will be aware that since 2009 Cardiff has never received any bad publicity or criticism regarding the management of outbreaks and clusters of infection.																				

115	Service	Cardiff	Staff Portal	There is a considerable risk that losing the specialist role of communicable disease will result in the likelihood that more outbreaks and local clusters will occur and that these will not be contained within the immediate population at risk and will spread more easily into the local community. This in turn will have an impact on the temporary operation, for example of businesses, schools, care homes and nurseries.
116	Service	Cardiff	Staff Portal	The enforcement of health and safety and the management of these risks is very different to that of food safety. Thus the principles of food safety enforcement cannot be applied to health and safety enforcement if you wish to deliver an effective service which creates and restores a safe working environment
117	Service	Cardiff	Staff Portal	All local authorities are required to base their approach to health and safety enforcement and thus their Intervention Plan on the National Local Authority Enforcement Code and Local Authority Circular (LAC) 67/2 (rev 4). This is a dynamic risk based approach to targeting health and safety regulatory interventions and changes regularly dependant on annual accident statistics and industry data. Thus inspections are limited to the highest risk premises only and a range of other proactive themed interventions are then applied to known risk activities and premises to improve awareness and management of health and safety. Cardiff adhere to this approach. The proposed structure of dual inspections goes against this guidance as food businesses under the guidance are categorised as low risk and therefore do not require inspection, dual inspections for health and safety and food safety are not necessary. The health and safety resource would be better used inspecting high risk premises and undertaking proactive interventions of high risk activities.
118	Service	Cardiff	Staff Portal	Cardiff has a higher number of high risk premises and high risk workplace activities than the Vale and Bridgend and the challenges presented in Cardiff are significantly different to that of the Vale and Bridgend. This supports the need for specialism.
119	Service	Cardiff	Staff Portal	Health and Safety specialism is critical to workplace safety in Cardiff the diversity and technical detail required to undertake accident investigation including fatalities and complaints and undertake inspections supports this: <ul style="list-style-type: none"> o Risks range from working at height, Legionnaires' Disease, risk presented by the use of chemicals, working with dangerous machinery, gas safety and carbon monoxide exposure, risk associated with large outdoor events, asbestos exposure to name a few o This results in the requirement for longer inspections ranging from 2- 3
120	Service	Cardiff	Staff Portal	Health and safety specialism in Cardiff has meant we lead on many local and national proactive interventions resulting in the delivery of an efficient risk based service which benefits Cardiff businesses

136	ICT	Cardiff	Staff Portal	It is felt that realistically the new way of working, supported by IT and hand helds etc is unlikely to be a quick fix. Not achieved in Worcestershire 4 years on. Therefore to achieve this more quickly important that existing staff (over an above the number in the proposed structure) should be employed to deliver the change programme.
140	Project	Cardiff	Trade Union Scrutiny Questions	The Williams Report recommended the City of Cardiff Council merges with the Vale of Glamorgan. It is generally accepted the recommendations of the Williams Report will go ahead as the merger will bring the benefits of a larger scale organisation to both Councils. Is it good use of money and resources to go ahead with this piecemeal collaboration of one service when this larger, all-encompassing merger is on the horizon? A service which also includes Bridgend Council does not seem practical when it is likely that Bridgend will merge with a neighbouring Council to the West.
141	Service	Cardiff	Staff Portal	In order to call yourself an EHP or EHO, you must have qualified from a CIEH-accredited course in environmental health and hold the Environmental Health Registration Board Certificate of Registration in Environmental Health (or equivalent). Holding a Higher Certificate in Food Premises Inspection, holding a degree in environmental health on its own or working as a technical officer, for example, do not allow you to work as an EHP.
142	Service	Cardiff	Staff Portal	The models proposed for Commercial Services suggest multi – skilled officers and there has been a lot of discussion about combined health and safety and food visits, however this should be considered in the context of the requirements for health and safety enforcement by local authorities which is directed by the Health and Safety Executive (HSE).
143	Service	Cardiff	Staff Portal	In Cardiff, the Health and Safety team’s work concentrates on high risk activities. Food businesses in general are low risk in terms of health and safety and therefore there would be little saving in resource by requiring food officers to deal with health and safety.
144	Service	Cardiff	Staff Portal	Examples of project activity in food businesses include: dermatitis in food handlers, slip risks in kitchens, gas safety, solid fuel catering appliances –carbon monoxide risk. These are all as a result of being an HSE national priority.
145	Service	Cardiff	Staff Portal	The emphasis on concentrating resource for health and safety interventions during food hygiene inspections, would skew the interventions towards low risk food business. Higher risks exist at warehouses, leisure and sporting activities, residential care homes, hotels, beauty therapies and skin piercing and entertainment such as event arenas, nightclubs and major event management

146	Service	Cardiff	Staff Portal	Hazard spotting may rectify immediate issues but does not identify the root cause of the problem and does not help a business to manage its own health and safety. Long term improvement in health and safety can only be achieved if the business puts into effect a proper management system to ensure a positive health and safety culture. A specialist health and safety team has the time to ensure this is achieved either by an advisory or enforcement approach.
147	Service	Cardiff	Staff Portal	A number of aspects of the health and safety team's work require specific technical knowledge and skills and investigations can take a number of weeks or sometimes months. This would be difficult to achieve if allocated to an officer with other tasks to perform such as food hygiene inspections which have to be undertaken in accordance with risk rating and the specified targets
148	Service	Cardiff	Staff Portal	We follow the HSE/LAU guidance on approach to service delivery, where possible working with business to achieve compliance. This is more effective in the long term in obtaining sustained compliance. We are actively involved in partnership groups, SE Wales H&S Task Group, Health and Safety Technical Panel and represent Welsh local authorities on the National LAU Health and Safety Practitioner forum which are invaluable in exchanging ideas and keeping up to date.

149	Service	Cardiff	Staff Portal	<p>Many regional and all Wales health and safety interventions have been initiated and developed by Cardiff officers and we take part in most of the working groups for project development.</p> <p>These are a few examples:</p> <p>Manual Handling in Licensed Premises</p> <ul style="list-style-type: none"> • initiated in Cardiff and developed by Cardiff and Blaenau Gwent and became an all Wales project <p>Moving Goods Safely</p> <ul style="list-style-type: none"> • HSE led initiative, Cardiff officer on working group and included a seminar attended by over 300 businesses focussing on transport safety. <p>Violence in Licensed Premises (SMILE)</p> <ul style="list-style-type: none"> • Welsh LA's in partnership with Cardiff University , Cardiff officer on working group. All Wales project <p>Legionella project</p> <ul style="list-style-type: none"> • developed in SE Wales task group in response to SE Wales outbreak, Cardiff on working group , all Wales project <p>Cryptosporidium project</p> <ul style="list-style-type: none"> • initiated in Cardiff in partnership with PWTAG. Working group led by Cardiff officer, all Wales project. U tube DVD available for all. <p>Tattooing Project</p> <ul style="list-style-type: none"> • local project developed in Cardiff, likely to be taken up by other authorities and U tube DVD available for all <p>There are also many more regional and local projects where we have been involved in the development.</p>
150	Service	Cardiff	Staff Portal	<p>Finally, there is concerned about the number of inaccuracies in the report including the wrong number of staff in the Health & Safety Team (states that there are 3 technical officers when in fact there is only one!) and the number of high risk premises – these change on a annual basis, most of which are not food premises.</p>
151	Service	Cardiff	Staff Portal	<p>The collaboration report considers one element of the health and safety workload only - proactive inspections. I can only assume this is due to the fact that proactive inspections are easy to "measure". Has any consideration been given to the other duties and services provided including accident investigations, permissioning visits (tattoo, skin piercing, asbestos removal), H&S projects (which are utilised using the H&S national code), complaints, water sampling for bathing water etc.</p>

152	Service	Cardiff	Staff Portal	The Health Improvement Team although small is responsible for providing a comprehensive health protection and improvement service to businesses, residents and visitors of Cardiff. This is achieved by investigating cases and outbreaks of communicable disease, the application of control, preventive and enforcement measures and analysis and reporting of public health data. The Team is also responsible for management and delivery of infection control, nutritional training and food safety interventions, health promotion initiatives such as the safe tattooing project 'Before you Ink – think', Healthy Options Awards, Hand Hygiene interventions and implementation and evaluation of other food safety and health and safety initiatives. Many of the projects have been resourced through gaining external funding sourced through the officers partnership skills and their reputation. As well as the enforcement of Health Protection legislation.
153	Service	Cardiff	Staff Portal	Limited preparation time has prevented full consideration of the report. However initial concerns relate to: Management of Stray horses. This presents a significant safety issue in Cardiff, where the horses are straying onto busy arterial roads. The problem is different in the Vale and Bridgend where the concerns are mainly fly grazing. Cardiff currently has one officer, but a significant additional resource is drawn in to help when required, from the trading standards team. Out of hours, the council's highways team will respond. It is believed that this is a local problem which requires a local response given that linkages with highways team are critical. Collaboration proposal includes for 1 horse officer across 3 areas. The risk to the service is a slower response to matters of concern and dilution of the service received by Cardiff. Significant elements of the current trading standards service are not detailed e.g. safeguarding vulnerable people from cold callers and scams are not mentioned. A critical element of this work is Financial Capability Training delivered in Schools in deprived communities, this is not mentioned.
154	Service	Cardiff	Staff Portal	Licensing activities have been placed with the Neighbourhood Team. It would appear to make more sense to place with the Commercial Team, given the link with business premises i.e. takeaways, pubs, street traders etc
155	Service	Cardiff	Staff Portal	There are some people in the existing structure (on low grades) which will have no post to apply for in the new structure due to their current qualifications e.g. the Food Safety Team sampling & project officers. It could be argued that the need for these positions is greater when the posts are being shared by 3 authorities.

156	Service	Cardiff	Staff Portal	<p>I am in favour of pursuing the proposal. There are however, elements of the proposal that in my view need further consideration:</p> <p>1. Insufficient emphasis is given to some services currently delivered in Cardiff.</p> <p>The detail in the proposal is insufficient to determine what services and the level of service that will be provided and whether this will be adequate to deliver the statutory obligations. Significant chunks of current work are not specified at all e.g. the safeguarding agenda, a political priority in Cardiff which involves scam investigation, working with the police, cold call control zones, supporting vulnerable victims of crime and offering financial capability training . Other examples are the health promotion activities which are undertaken across all the services and support the health agenda. It is important that these and other elements are captured and a proper consideration given to the new service standards and priorities in a reduced service.</p> <p>I'm also concerned that communicable disease management has not been given sufficient thought. The role in Cardiff currently involves 1.6 FTE on a full time basis and a significant chunk of the group leader's time.</p>
157	Service	Cardiff	Staff Portal	<p>2. Achievability of the food hygiene inspection programme</p> <p>The original proposal included additional officers, specifically Business Compliance officers. These were mainly located in the Commercial Team and during the revision stage have been removed. I'm concerned that the number of officers shown in the proposed structure will now be insufficient to delivery statutory obligations set out in the Food Law Code of Practice. As an example the current high risk inspection programme across the 3 authorities is 2,269 (this figure changes annually) .There are also obligations to apply interventions in lower risk premises not included in this figure. Given current inspection targets this would require 18 FTE officers to deal with high risk food inspections & port health only. The proposal makes provision for only 46 in the Commercial Team. Once the 18 above is removed this leaves only 28 for trading standards and health and safety inspection activity across three authority areas, which is less than the number currently employed in Cardiff.</p> <p>3. Officer titles</p> <p>Officers across all teams feel very strongly about retaining professional titles such as Environmental Health Officer and Trading Standards Officer. In addition these are titles that customers recognise and understand and consequently have benefit from a customer service perspective. I support the argument that these job titles should be maintained.</p>

158	Service	Cardiff	Staff Portal	<p>4. Removal of specialist role / teams which is currently key to the success of Cardiff's Service and its reputation. Specialist teams and roles have been traditionally developed in larger authorities where resource allows this to happen. This is an approach which has evolved because specialist teams are known to be more efficient and competent. One of the benefits of collaboration is that it protects staff numbers allowing this approach to continue to be sustainable. The collaboration proposal need to better recognise the benefits of specialisms whilst at the same time multi skilling officers to identify and remedy matters of evident concern when found during an inspection. This approach is different to undertaking an all encompassing approach at every inspection, which is contrary to the enforcement guidance which specifically requires a risk based approach. The priority given to health and safety work is a concern, there is a danger that food safety inspection targets will always be given priority and high risk project based health and safety activity will not be undertaken.</p> <p>5. Additional projects</p> <p>Being able to be a part of new approaches and projects and leading service development in Wales as well as the LA is an appreciated benefit of working in Cardiff. The Council has given commitment to deliver 2 significant projects namely IMLU and the Welsh Landlords and Agents Licensing scheme (WALLS). These are two projects potentially in scope for collaboration. It is important to secure early decisions, from the new host authority, of their commitment to take these and other similar projects forward in future.</p>
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159	Service	Cardiff	Staff Portal	<p>Whilst the Vale of Glamorgan Council do not offer any form of out of hours service and Bridgend Council offer a scaled down version of an out of hours service this may reflect on the character of the areas and hence insufficient demand to justify a full service. Cardiff on the other hand is a capital city that needs an out of hours noise service. It hosts major events, has almost 1300 licences premises, greatest population over a comparative small area, has high density housing which inevitably brings about anti social behaviour in the form of unwanted noise affecting neighbours; and significant developments with construction activities taking place. The demand for such a service is real in Cardiff and it is important that Environmental Scrutiny committee is fully aware of the possible consequences that Collaborative working may have on it's current Noise Service. Cardiff's Noise service provide a statutory service only, investigating all alleged noise nuisance complaints (not private or common law nuisance). The report seems to suggest that private and common law nuisances are currently being dealt with and that there is a possibility to reduce the demand – this is incorrect as Cardiff only deal with complaints that there is a statutory duty for the authority to investigate</p> <p>The proposed flexible working will not be able to deliver an effective Pollution Service. Most noise issues happen at night, outside normal working hours and in order to resolve those issues officers will need to be available at those times. The proposed host authority "Vale of Glamorgan Council" have a flexible system which allows working between 8am and 6pm (Cardiff's current scheme is 7am – 7pm). These hours go no where near what is required in Cardiff. Certainly paying overtime to officers is not the answer but a properly structured pool of officers working at times when of greatest demand could be the way forward..</p>
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160	Service	Cardiff	Staff Portal	<p>3. Officer titles Officers across all teams feel very strongly about retaining professional titles such as Environmental Health Officer and Trading Standards Officer. In addition these are titles that customers recognise and understand and consequently have benefit from a customer service perspective. I support the argument that these job titles should be maintained.</p> <p>4. Removal of specialist role / teams which is currently key to the success of Cardiff's Service and its reputation. Specialist teams and roles have been traditionally developed in larger authorities where resource allows this to happen. This is an approach which has evolved because specialist teams are known to be more efficient and competent. One of the benefits of collaboration is that it protects staff numbers allowing this approach to continue to be sustainable. The collaboration proposal need to better recognise the benefits of specialisms whilst at the same time multi skilling officers to identify and remedy matters of evident concern when found during an inspection. This approach is different to undertaking an all encompassing approach at every inspection, which is contrary to the enforcement guidance which specifically requires a risk based approach. The priority given to health and safety work is a concern, there is a danger that food safety inspection targets will always be given priority and high risk project based health and safety activity will not be undertaken.</p> <p>5. Additional projects Being able to be a part of new approaches and projects and leading service development in Wales as well as the LA is an appreciated benefit of working in Cardiff. The Council has given commitment to deliver 2 significant projects namely IMLU and the Welsh Landlords and Agents Licensing scheme (WALLS). These are two projects potentially in scope for collaboration. It is important to secure early decisions, from the new host authority, of their commitment to take these and other similar projects forward in future.</p>
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20th August 2014

From: Ken Daniels

To: Cllr Dan De'ath

Dear Daniel,

I enclose the above report, and also the questions from my members you would have seen them before as I gave you them at scrutiny, but nobody from the Labour Group or opposition have seen my members concerns.

The GMB and Unite Cardiff oppose the collaboration of Cardiff with Bridgend and the Vale on the following grounds the report is flawed.

We as unions are not against collaboration if all full facts and figures stand up and are not detrimental to GMB and Unite Members in Cardiff.

We as Unions have concerns about the transferring of staff to a body which will have no capital finance, it is still all predicated on the three councils paying money in which is what you do now..

Our members will transfer to an unknown entity if this collaboration goes through, we have already been told that staff will transfer on their current terms and conditions that is TUPE so from day one there will be a three tier workforce as not everybody is on the same terms and conditions and grades this will cause chaos.

I will enclose the report from scrutiny in Worcestershire which will make interesting reading for you as it still does not stop jobs going to the private sector nor has it stopped jobs from going, this is what the Atkins report was based on also look at what they claimed at the time, GMB warns you that don't rush into this collaboration you will be doing know favours to your constituents or staff.

Also I am sure you are aware of the dangers in the so called costs for IT everybody knows this is always a disaster which has been shown to be correct in the Worcester document.

We have also been told that we will then have to start discussions about terms and conditions which it looks to us as 26 posts will be cut and posts will be downgraded mainly to Cardiff Council staff.

This union cannot allow a transfer knowingly know that our members will be far worse off.

Now you know this as the cabinet member, and as Labour Council are you going to allow this to happen. It then looks as you are selling Cardiff jobs to the Vale on a Trade off.

We would also ask you to look into the fact that if you issue an enforcement notice on a restaurant in Cardiff then the staff member issuing the notice has to work for that council otherwise it is an illegal enforcement notice.

Cardiff will not benefit any return if any till at the end of 2017 and Cardiff's share if split three ways will be approx 300K this is not guaranteed either.

Cardiff has the most staff and puts in the most money, you as Cardiff councillors have a duty to the citizens of Cardiff not to the Vale or Bridgend

The Williamson report will not be far off being implemented what will then happen to Bridgend, this is a recipe for disaster so where is the sense of spending a lot of money now and won't be able to disentangle that easy, no costs have been allowed for this in the Atkins report either..

I would also raise the point that if staff are transferred under TUPE then how can this council still pick up the VSS costs which if you look at the report Cardiff will still be picking up all costs even when they have transferred to the host Authority this is absurd.

The report is flawed on the basis that the figures do not stack up regarding the savings as this can only come through with losing jobs to which we are now doing so anyway, so in effect it is no different in reality to what is happening now.

We can save this money for Cardiff now delete our vacant posts and allow managers to go on VSS if they want it, we have vacancies find out how much you can save now by not filling these vacancies.

I also think that the staff moral is at an all time low as this report means your not just downgrading their jobs but also there technical ability will be diluted, you cannot expect them to be trading standards officer one day and then be food hygiene the next day they are two different distinct professional jobs and should remain so.

This is like you being a councilour one day then you would be a brain surgeon the next I know some councilours think then can do this but in reality it will never happen.

The report states the training is about 2 K this is vastly understated it will cost 4 times as much to try and train staff to be multi functional once again it is nonsense.

To try and train non qualified offers is about £1650 and will take about a year has this been costed in the Atkins report as I can not see it and who will train the staff.

As to our knowledge there are no courses available in Wales to achieve the Higher Certificate in food premises inspections.

Also TSO training in the report is vastly underestimated we believe that you will not get training for £300

My members have trained and qualified as an EHO and they would like to be recognised as such. If they had wanted to do fair trading, weights and measures etc then they would have chosen to do TS etc we do feel that to ask TSO and EHO's to do everything shows a complete misunderstanding of what my members actually do and reduces the importance of the work they do whether in each of these specialised fields. Services will suffer.

- You as a Lead Council member need to take other considerations into account and I list them.

City and County of Cardiff Council currently operate a Night Time Noise Service which operates from Thursday through to Sunday to respond to complaints from Cardiff residents of any noise complaints. This service has been running since August 2008 and has been highly successful in dealing with noise at the time, particularly from one off complaints and with cases where all the noise happens out of hours. On average Noise & Air team receive 11, 000 calls out of hours relating to noise. Within Atkins Target Operating Module (page 80, "Housing and Environmental Protection") it clearly proposes a **"Reduction in out of hours services. This approach should be set out in a noise Policy to be agreed by the Joint Committee"**.

The report also goes on to state that, **" The provision of an out of hours service will be an option for the whole service but will probably be subject to separate agreement and additional cost beyond the basic cost. Cardiff Council may consider reducing the current service to reduce cost. Out of hours services should adopt flexible working arrangements rather than relying on overtime payments."**

Whilst the Vale of Glamorgan Council do not offer any form of out of hours service and Bridgend Council offer a scaled down version of an out of hours service this may reflect on the character of the

areas and hence insufficient demand to justify a full service. Cardiff on the other hand is a capital city that needs an out of hours noise service. It hosts major events, has almost 1300 licences premises, greatest population over a comparative small area, has high density housing which inevitably brings about anti social behaviour in the form of unwanted noise affecting neighbours; and significant developments with construction activities taking place. **The demand for such a service is real in Cardiff and it is important that Environmental Scrutiny committee is fully aware of the possible consequences that Collaborative working may have on it's current Noise Service.** Cardiff's Noise service provide a statutory service only, investigating all alleged noise nuisance complaints (not private or common law nuisance). The report seems to suggest that private and common law nuisances are currently being dealt with and that there is a possibility to reduce the demand – **this is incorrect as Cardiff only deal with complaints that there is a statutory duty for the authority to investigate**

The proposed flexible working will not be able to deliver an effective Pollution Service. Most noise issues happen at night, outside normal working hours and in order to resolve those issues officers will need to be available at those times. The proposed host authority "Vale of Glamorgan Council" have a flexible system which allows working between 8am and 6pm (Cardiff's current scheme is 7am – 7pm). These hours go no where near what is required in Cardiff. Certainly paying overtime to officers is not the answer but a properly structured pool of officers working at times when of greatest demand could be the way forward..

- Expertise and specialism V. generalists.

The target operating model proposes to split Pollution Control to "Neighbourhood Services" and "Enterprise and Specialist Services". "Neighbourhood Services" would deal with Housing and Pollution Control Complaints whilst "Enterprise and specialist Services" would deal with Contaminated land, Environmental Permitting and Monitoring activities. It is intended to train more Housing officers to deal with noise and Air complaints and vice versa. Almost all of Cardiff's Noise and Air team hold Certificate of competencies for Environmental noise monitoring. To undertake such training for all Housing would cost £1100 per person. Similarly there will be costs to train officers in aspects of Housing Enforcement. The synergies within the existing Pollution Control section at Cardiff rolled out over the 3 local authority areas would provide greater resilience, reduce the training costs of the proposed structure. There would be greater opportunity for professional development, better office retention and job satisfaction. This was a strong opinion that was voiced during consultation with staff which seems to be overlooked, or given no weight. There are certainly other nuisance (other than Noise, air, odour, smoke) issues such as accumulations, prevention of damage by pests, nuisance from animals and premises that could be dealt with by Pollution Control which would avoid the requirement to generalise and retrain officers.

It is not clear where Air Quality would be delivered. Again I would reiterate that Cardiff has 4 Air quality Management Areas and the function is delivered from within Pollution Control. I would propose that all of pollution be contained with Neighbourhood Services to maintain a high quality specialist Service, as currently is the case in Cardiff.

As you can see there some worrying concerns

Cabinet keep saying we cannot keep salami slicing, be warned what is being proposed is nightmare on Cardiff streets, rouge traders will pop up all over the place e coli will become rife as you will have no call on the new body even though you will have two councillors on the board ,but it should all be about Cardiff and the staff.

I will also enclose the staff concerns so at least not just you as the cabinet member knows but all Labour group as well.

I do hope that you will as a cabinet member and as a Cardiff Cabinet come to the correct decision which is not to continue with the collaboration as the Atkins report is flawed and the public will not thank you for putting them at risk just to rush head long into the unknown..

Cardiff also has to put in the lions share of implementation costs why this should be split between the three authorities is this not collaboration.

I would also point out Paragraph 33 states the number of staff who could potentially loose in remuneration will be lower if Cardiff is the host Authority so if you still consider going ahead with these flawed proposals then stick up for Cardiff and make us the host Authority are you prepared for Cardiff Council staff to loose money.

This will send out a terrible single to all staff of this authority

As I receive more information I will let you know GMB concerns so this is not the final word from GMB and Unite Cardiff.

I look forward to your reply

Ken Daniels GMB Branch Secretary Harris Karim Unite

**CABINET SUPPORT OFFICE
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My Ref / Fy Ref: CM28476

Date / Dyddiad: 15 September 2014

Mr Ken Daniels

Dear / Annwyl Mr Daniels

Thank you for your email. As you are aware the City of Cardiff Council has to make unprecedented savings and there is a need to review how services are delivered so we can deliver a balanced budget. Difficult decisions have to be made and we will continue to work with the Trade Unions to have meaningful debate as the transition takes place.

I have responded to the statements you have made below in the order that they were addressed in your email received on August 20.

From the outset I would like to make it clear that we are trying to avoid compulsory redundancies. I note from your submission that the GMB isn't against collaboration but this cannot be 'detrimental to your members'. In reality as the revenue budget is made up of 95 % staff cost, any form of redesign will have staff implications so although your request in theory is favourable unfortunately it is unrealistic.

A Joint Trade Union Forum has been set up and we are committed to working with the Trade Unions as this process progresses.

The proposed new way of working will involve financial contributions as you point out, but the amount will be lower than in previous years. By working together we will increase resilience, share best practice, share experience and intelligence to provide the best possible service to our customers with the budget restraints.

The Project Team is working with staff to address their concerns. It is paramount that it is understood that the current way of working is unaffordable and unsustainable and has to change, whether this is done individually by each council or progressed through a collaborative model. It is acknowledged that change is unsettling and will need to be well managed but all staff are aware that if permission is given to proceed, soon after the TUPE transfer, there will be a proposed re-configuration which is outlined in the 'change' part of the report.

ICT development and management is essential to the new way of working to increase efficiencies in staff working. We have liaised with Worcestershire to learn from their experiences. There is a cost implication but the majority of this will be a one off investment and paid for using Welsh Government funding. The financial model also uses conservative estimations to ensure the ICT requirement is deliverable. Rather than dismiss the assumption as a 'disaster' as

PLEASE REPLY TO / ATEBWCH I : Cabinet Support Office / Swyddfa Cymorth Y Cabinet,
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you indicate, we will embrace and closely manage this area of the project, so that the ICT requirements are affordable and phased in, by the time the Management Team re-construct the target operating model after being refined due to the need to find additional savings since the report was written.

Jobs in the new model will be appointed on merit; through an agreed protocol with the unions. The aim is to get the best candidate appointed for each job. Any assumptions made in the report are done so for financial analysis. The detail of the loss of the 26FTE and where they will be lost from is unknown. If a recruitment process begins, the process of selection will be worked through with you and other Trade Union Representatives. It is important to confirm that if the Council chooses to reject the collaborative model, there can be no guarantee about the future level of service provision in Cardiff and measures may need to be considered which could result in a significant change in service delivery.

Your critique continues with a number of statements, your comments on enforcement action on a restaurant in Cardiff are incorrect – An officer has to have the correct level of authorisation depending on their competency. The authorisation would be from all three councils so they could work throughout the region.

Your comments on savings is interesting, as further savings would require further cuts which would impact further on your members and the level of service we can deliver to our customers.

Your comments on Cardiff's contribution are valid, and if we proceed the proposed cost is proportionate to the population. As you say, we have 'a duty to the citizens of Cardiff' and it is proposed that we deliver this through increasing resilience by working together and providing a better service than working individually. The project will be governed by a Joint Committee so Cardiff's interests will be clearly represented.

In reference to your comments on Williams, you may be aware that the WLGA recently published a discussion report on an 'alternative approach' to the Williams report and it states:

*'The fear is that the local authorities recommended by the Williams' Commission will be too large to be local but too small to provide the scale necessary for regional planning and the delivery of some key regionally based services. More than this, the cuts trajectory in Wales is such that the debate around a range of key services is now about sustainability rather than reorganisation. **For unprotected services, a structural reorganisation in 2020 offers cold comfort; the issue is to collaborate now to create resilience. This is particularly the case in a range of functions including transport, economic development, planning, regulatory services and others, which have faced the brunt of cuts thus far with more to follow.***

Due to financial restraints and the need to deliver a resilient service, we need to act now. The reality is that there will be job loses, it is envisaged that the majority of these will be voluntary. Regardless of when this happens, redundancy costs will need to be paid. The advantages of working together have been explained to you.

Moving into further detail on some specific points you and your members have raised. It seems as if there is an element of misinformation circulating about job roles. It is important to make clear that new roles will not dilute technical capability. Competent EHO's will still be involved in High Risk Premises and competent Trading Standards Officers will be undertaking enforcement action against illegal trading practices. We would not expect to train TSO's to undertake High Risk Food Hygiene Inspections and visa versa for EHO's. Competent staff may be required to undertake lower risk work across professional boundaries while retaining specialist capabilities within the resource available. It has been acknowledged by UNISON that this practice is in place at the moment and part of the professionalism of their job role.

Costs for training involve refresher training covering topics they have covered in their professional career and through their professionals' qualifications.

In fact there are sufficient numbers of qualified staff to undertake the duties required. I have explained that we are committed to retaining our specialisms; in fact we want to expand them as they are income generating. The proposed new way of working does involve change, we need to embrace this change which will give staff a wider level of responsibility, new challenges and experience which is positive for staff development.

It is understood that staff want specific information relating to their specific part of the service area, it is understood that the exact detail on all services isn't known yet, but it will and this will be the role of the Management Team when they are appointed. We are looking to agree the principle of collaboration at this stage, based on the Atkins Report and the council revisions that have taken place and will seek authority to produce a 3 year business plan for the service, which will explore this detail.

Finally, you have made the assertion in your opening paragraph that the report is flawed, but I fail to see any substantive reasons given to support this claim. All your comments on the 'fine details' are noted and will be addressed by the Project Team in their report to each Cabinet.

Yours sincerely
Yn gwyir



Councillor / Y Cyngorydd Daniel De'Ath
Cabinet Member for Safety, Engagement & Democracy
Aelod Cabinet Dros Diogelwch, Ymgysylltu a Democratiaeth

Regionalising Regulatory Services

Bridgend – Cardiff –Vale of Glamorgan

Staff and UNISON (Vale of Glamorgan)

Cabinet Report Proposal

COLLABORATION with COMPETENCY

September 2014

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6/. Benefits of 'Collaboration with Competency Model'

1/. Summary

This report in consultation with staff and UNISON proposes a revised model based on the 'Collaboration Only' model within the Atkins report. This model called the 'Collaboration with Competency' model combines the advantages of the 'Collaboration and Change' model with those of the 'Collaboration Only' model as previously proposed. The proposal is that the 3 authorities separately retain control of most of their core environmental health/ licensing functions with staff retaining their professional competencies and expertise. This would be through a district system of working with multi functional staff. This will provide for localism, local accountability and strengthen the relationship with the Public, Businesses and Members.

The financial benefits associated with the 'Collaborate with Competency' model are the greatly reduced IT costs compared with the 'Collaboration and Change' model and the more efficient positioning of existing staff. There will be savings due to the reduced headcount across the service including the consolidation and reduction of management posts together with the merging / collaboration of services.

Further savings will be possible in the 'Collaborate with Competency' model with the establishment of specialist teams working in collaboration and operating across the piste servicing Bridgend; Cardiff; Vale of Glamorgan. This will provide greater resilience and improved response to emergencies at a lower cost. Staff will make full use of their professional competencies and expertise with this model.

Most areas of environmental health and trading standards do not overlap and require a completely different skill set and approach. Within the 'Collaboration with Competency' model the two professions are retained as two professions and not merged into an unknown and untested position as a ' Commercial Services Officer'. Trading Standards staff tend to be naturally cross border and would operate either within a merged generalist or specialist team. This model is designed to be much less damaging to staff morale than the 'Collaboration and Change' model and will enable the 3 respective departments to retain talented staff and recruit in the future.

2/. Introduction

The Atkins report quite rightly states that the economic and political climate in Wales and the United Kingdom has required local authorities to provide services with ever decreasing budgets for a number of years. Welsh Authorities have been making 'efficiency' savings for some time and it is only now that authorities are facing the reality that these budget reductions are real 'cuts' to services which can no longer be euphemistically be called 'efficiency saving'.

These cuts are now significant and it will no longer be honest to state that we can deliver significant efficiency savings whilst still maintaining high quality services. We have to accept that the same level of service cannot be maintained but we need to minimise any adverse effects on the public, and our staff. We have a duty to protect public health. We must use our diminishing resources as efficiently and effectively as possible. This will involve a more radical proposal as the 'Do Nothing' with more salami slicing is no longer a viable solution.

For the last few years there have been a number of papers which have advocated collaboration. These include the Simpsons Review 2011 on Local Government 'Local, Regional, National: What services are best delivered where?' The following Ten Principles were proposed and it is useful to consider these carefully as we move into collaboration:-

1. *The outcome must be better for the citizen and the user*
2. *Focus on functions not whole services*
3. *It is about better collaboration not just hard geography*
4. *Collaboration can take many forms*
5. *Local accountability and freedoms must be enhanced*
6. *We have to ask the right questions*
7. *Leadership to deliver the change*
8. *Engaging the staff is critical*
9. *A contract with consequences*
10. *Supporting the change to deliver the change*

The Welsh Government Collaboration agenda is encouraging local authorities to work together to deliver services jointly across administrative boundaries. It is to be applauded that Bridgend, Cardiff and Vale of Glamorgan have been successful in securing support for a Collaboration Project from the Welsh Government Regional

Collaboration Fund and subsequently established a joint project team and Shadow Joint Committee.

The Atkins report considers 4 options 'Do Nothing'; 'Change Only'; 'Collaborate Only' and 'Collaborate and Change' which is their favoured option. However the 'Collaboration & Change' operating model is less identifiable as a Regulatory Service than is currently the case as for many years the public and businesses have been familiar with dealing with Environmental Health Officers (EHO) and Trading Standards Officers (TSO). These are professions, with professional bodies ensuring their competency and code of conduct. It is unlikely that the public and businesses will have the same confidence and could expect the same level of competency with the creation of the new posts Commercial Services Officer / Neighbourhood Services Technical Officer and Commercial Services Technical Officer. The creation of these new posts could also be confusing to the public and businesses. The 'Collaboration with Competency' model advocates the retention of EHO and TSO positions so would be more clearly identifiable as a Regulatory Service.

3/. Background

The Wales Audit Office (WAO) recently delivered their study findings on Local Government /Environmental Health. The fiscal crisis of 2008/09 resulted in the comprehensive spending reviews. Which meant cuts to local government funding. In real terms, revenue funding from the Welsh Government was around £283 million (seven per cent) lower in 2013-14 than 2010-11.

Regulatory Services impacts on everyone living in our communities. It contributes too many national policy agendas – public health, housing conditions, independence of vulnerable people, community well-being etc. It is regularly highlighted as an important council service by our citizens. Environmental Health spending only accounted for 0.42% of all Council's revenue expenditure in 2013-14. The WAO study states that budget patterns suggest there has been 'salami slicing' not fundamental shifts in working. The main areas for Environmental Health budget expenditure are pollution control, food safety and housing. However pest control has seen the largest budget cut as a service area followed by licensing and health and safety across Wales.

Environmental Health staff accounted for 0.96% of all Council staff in Wales 2012-13. However Environmental Health Service staff numbers have fallen by 16.4% between 2011-12 to 2013-14 from 1030.5 to 861. Overall Council staff numbers reduced by 6.9% in the same period. The greatest level of staff cuts has taken place at trainee, Manager/Team Leader and Administration staff levels.

The only area of growth in staff numbers is unpaid trainees. Most staff work in four main areas: Housing; Pollution Control; Food Safety; and Licensing. All core areas of work have seen reductions in staff of between 14.4% and 19.7%.

According to a Workforce Survey that was recently released by Trading Standards Institute (TSI) and the National Trading Standards board, by 2016 most trading standards services in England and Wales will have been cut by an average of 40% since 2010. As a result of these cuts, more than 70% of the trading standards services that responded to the survey will restrict or stop some services. These cuts threaten consumer rights, consumer safety and the health of legitimate businesses.

According to the Welsh Heads of Trading Standards (WHoTS) and the Welsh Local Government Association (WLGA) (Interim Report 2012) there are a number of external drivers for change and collaboration within trading standards in Wales. These include:

- Welsh Labour Party Manifesto Pledge referring to a “*national Trading Standards Service*”
- Welsh Government/WLGA Compact highlighting a “*national Trading Standards Service*” as a “big ticket item”
- Simpson Review suggesting *more cross-boundary working and collaboration*.
- National Audit Office Report stating that much consumer detriment ‘*crossed borders*’
- Consumer Policy Landscape and FSA Wales consultations raising *concerns about small trading standards services* creating enforcement gaps and being unable to fulfil statutory obligations.
- Public Accounts Committee stating that the level of service available to consumers varies across the country and is *inadequate in some areas*.
- *Regulatory services budgets in Wales have been cut by 5.9%* compared to overall council cuts of 1.2%.
- Economic downturn has caused *more businesses to break the law and increased complaints*.

In terms of resilience they state that any new model should:

- Improve capacity and ability to share resources
- Increase the ability to recruit, retain and develop key staff
- Improve partnership working
- Improve competence and the skill base

A Local Better Regulation Office (LBRO) report on regulatory budgets [Nov 2011] established that in Wales, Trading Standards had fared worse than Environmental Health, a decrease of 7.4% as compared to 5.3% for Environmental Health (which includes licensing, although most licensing functions must be cost-neutral).

The economic downturn has also caused more businesses to break the law. The population is getting older leading to more vulnerable consumers for rogue traders to target.

Since the Atkins report was produced the 3 Councils Bridgend; Cardiff City Council and Vale of Glamorgan Council have made further budget reductions for the 2014/15 financial year of approximately £1 million. Therefore a supplement to the Atkins Report (Appendix B) is included with the Regional Collaboration proposals. A comparison of the total current budgets for the 3 authorities is set out in tables. The comparison shows that the overall net budget available to the service has reduced from £8.246 million to £7.260 million, a reduction of £986k. However, the gross budget has actually reduced by £1.275 million, and has partially offset by a budgeted reduction in income, specifically a reduction by Cardiff Council of £281,000.

Further tables are provided in Atkins Report (Appendix B) regarding the revised budget for 2014-15 as the current year's funding. It has been amended to show a reduced number of posts and associated savings.

The original Atkins Report was based upon a headcount of 280 (Sept 2013) across the 3 authorities with a staffing complement of 258.8 (FTE) posts, of which 14 were vacant. Following significant budget reductions in 2014-15, the revised Atkins base position when the financial information was updated is 237 posts (FTE), of which 16 are currently permanent post vacancies and 11 permanent posts filled on a temporary basis. Appendix B identifies 210 FTE posts in scope to transfer and in the final Regionalised Regulatory Services – Organisation Structure for the 'Collaboration & Change' model there are just 178 FTE posts of which 10 are Cardiff Dogs Home staff. This is a significant reduction in front line public protection staff of 80.8 FTE posts 31% almost a third of posts. However with further reductions the final number of staff left in post under this model could be even lower.

4/. Approach

The consultants Atkins state they developed their Target Operating Model, Business Case and Implementation Plan over a ten week period in consultation with Heads of Service, Directors and Chief Executives. They claim that it draws on extensive engagement with staff and managers in regulatory service at all three participating councils.

Page 21 of the Atkins report states the following' *The detailed feedback and outputs from each of the manager's workshops and from the first and second phase of staff*

workshops have been documented in detail and are available in a separate suite of reports. All of the information gathered was given extensive consideration and clearly informed the development of the Target Operating Model, Business Case and Implementation Plan.'

However the proposed significant changes and controversial issues were never raised with staff at the staff workshops. If they had of been there should have be no problem with management allowing access to the Atkins report after it was submitted to the Shadow Joint Committee on the 28th November 2013. However it was only actually given to staff at 10.00am on the 17th July 2014. As it was UNISON attempted to get a copy of the report through the F.O.I process over those 7 months and was denied access. The request was then taken to the Information Commissioner. After the release of the final Atkin's report staff had 3 working days before it went to the first Scrutiny Committee in the Vale of Glamorgan on the 22nd followed by submission to the second Scrutiny Committee on the 23rd July.

Those controversial issues not raised at the staff workshops included the introduction of 12 Business Compliance Officers (BCO's) .The Atkin's report stated that they were introduced on the basis that they could reduce the numbers of inspections required from professionally qualified officers (Page 82 middle paragraph). However the evidence for this was not provided and these positions and related posts have subsequently disappeared from Atkins supplementary report (Appendix B).

Another issue not previously raised at any staff workshops was Atkins statement that there is a need for a net movement from professional to technical roles (point 81). The justification for this is not given and it does not sit well with the content of (point 83) which refers 'aim where possible is to assimilate staff into positions congruent with their existing status and grade'.

There was also no mention at the workshops in 2013 of EHO's and TSO's being replaced by Commercial Service Officers and Commercial Service Technicians together with Neighbourhood Services Officers and Neighbourhood Services Technical Officers. The Job descriptions (JD) and person specifications (PS) are not given for any of these new posts either within the Atkins Report or the supplementary report (Appendix B). This is despite the fact that (Page 171 – 176 Appendix I) gives the JD for the Chief Officer, Regulatory Services and the JD and PS for the Service Manager regulatory Services.

Similarly the salaries, grades and estimates for all 3 authorities have been blanked out (Page 203 Appendix N Grade and Cost Assumptions for Indicative New Structure). This is of particular concern when the Atkin's report is essentially dealing with cost savings. Costings for alternative proposals cannot therefore be accurately calculated as staff costs have been redacted.

The consultants from Atkins were under a tight deadline to complete their cost saving report on time for the 28th November 2012. They had little time to become familiar with the 3 departments and this is revealed by the fact that although they give examples of case studies in Buckinghamshire and Great Yarmouth there are no examples of good practice given within Bridgend, Cardiff or the Vale of Glamorgan.

The proposals within this paper are based on observations and feedback from the staff that will be working with the new structure and will be most affected by the changes. The consultation period since the release of the report and before it is submitted to cabinet in September is short and made more difficult because it is during July / August when many staff are on leave and Members are in summer recess. Members concerns are also raised and addressed within this submission.

The Atkins report page 58 states *'Given the level of savings required of the current services, it is inevitable that there will be some reduction in the provision of services. A collaborative model that is shared between Bridgend, Cardiff and Vale of Glamorgan Councils offers an option for keeping service reductions to a minimum, maintaining statutory requirements and enhancing operational resilience.'* We agree and propose that the optimal collaboration model is 'Collaborate with Competency'.

Considering the level of cuts and the fact that these follow on from previous 'salami slicing' what has not been addressed is the thorny issue of what functions can no longer be provided by the smaller service. It is morally wrong and cowardly to determine this by what gets squeezed out when the remaining staff are placed under further pressure.

5/. The Economic / Business Case

5.1 Financial

The supplement to the Atkins report Appendix B give tables of financial comparison (net present value) for the 3 options of 'Change Only' ; 'Collaborate Only' and Atkin's favoured option of 'Collaborate and Change'. Adoption of the 'Change Only' model involves significant implementation costs like the 'Collaborate and Change' model but it does not allow access to the Regional Collaboration Fund of £250k for 2014-15 and £250k for 2015-16. Adoption of the 'Collaborate Only' option however results in a positive net present value (NPV) of £1.531 million and net savings of £350k per annum. The total cash inflows significantly outweigh the total cash outflows. But there is an assumption that the only significant change to the service is the creation of a single management structure. Under the recommended amendment to this model further significant changes (specialist teams operating across the piste

/ significant IT reductions/ district EHO's) are proposed to reduce costs and improve resilience and performance within the new 'Collaboration with Competency' model.

Adoption of the 'Collaborate and Change' model favoured by Atkins results in a positive net present value (NPV) of £2.908 million and net savings of £1.384 million per annum. The total cash inflows significantly outweigh the total cash outflows. However this is as a result of the reduced number of staff in the proposed structure compared to current staffing levels.

The 'Collaborate Only' option provides the greatest return on investment over a 5 year period. But additional changes ('Collaborate with Competency' model) to the service are proposed to bring overall savings more in line with the 'Collaborate and Change' model. As information regarding salaries, grades have been redacted within Appendix B (pages 36-39) it is not possible at present to fully cost out the 'Collaborate with Competency' model but it must be assumed that the number of staff in the final structure would be similar to that given in the 'Collaborate and Change' structure Appendix B (page 40). However because of a considerably reduced spend on IT as proposed within the 'Collaborate with Competency' model this would allow the service to retain more staff.

5.2 Williams Commission

The footprint for the Williams Commission merges the City of Cardiff Council with the Vale of Glamorgan. It is generally accepted that the recommendations of the Williams Commission will go ahead at some stage as the merger will bring the benefits of a larger scale organisation including economies of scale to all Councils across Wales. However which ever option is eventually chosen across Wales it is clear that Bridgend will not be merging with Cardiff and the Vale of Glamorgan.

The present budgetary pressures suggest that the Regulatory Services Collaboration between the 3 authorities is the way forward and that savings must start now. However we must be mindful that in a few year's time another major all encompassing merger is on the horizon. Thus it would not make sense to invest a lot of time and money in a structure for collaboration that could not easily be disentangled in a few years' time when Bridgend will merge with a neighbouring Council to the West. Significant money and resources for example could be wasted on IT systems which would only need to be changed yet again in the not too distant future. The 'Collaborate with Competency' model does allow for this flexibility which is prohibited by the considerable IT costs within the 'Collaboration and Change' model.

The 'Collaborate with Competency' model allows for greater accountability and freedom for Bridgend to retain control of core regulatory functions at a local level. In the future it would therefore be easier for Bridgend to break away if necessary and collaborate to the West.

5.3 Member / Officer Relationship

Members and the public have benefited from a good relationship with officers within their respective Councils. If Members have experienced public health concerns within their wards they have known who to approach and this has been to the benefit of both the public whom they represent and the officer /member relationship. There is a need for localism within the chosen model.

Members are quite rightly concerned at the possible loss/damage to this relationship if the 'Collaborate and Change' model was adopted. The Member / Officer relationship has consequences to the risk to public health. It needs proper consideration and is catered for within the 'Collaborate with Competency' model which is proposed. This is because core Environmental Health functions with Licensing would be retained at a local level. District EHO's will have better community links with public health bodies and with the local communities which will strengthen the Member/Officer relationship.

District work also gives ownership of issues to officers, strengthens links and helps to build trust with businesses and Members

5.4 Competencies & Professional Officers

Public protection functions and responsibilities must be undertaken by officers that are both fully trained and competent to do so. Environmental Health Officers (EHO's) and Trading Standards Officers (TSO's) are professional officers who are required to maintain and prove their levels of respective competency.

The Atkins report suggests that these 2 professions can somehow be squeezed together within the position of 'Commercial Services Officer'(CSO). Both positions are highly specialist requiring long term training. There is no clear explanation within the report of how this would work in practice, particularly when the report lacks a JD and PS for the CSO post. Staff are already struggling to meet their statutory functions including food hygiene inspections and the statutory obligation to investigate complaints of statutory nuisance. The 'Collaboration and Change' model does not explain how conflicting statutory functions would be prioritised by the CSO and how ultimately public health is not placed at risk.

However the 'Collaboration with Competency' model plays to the strengths of the two respective professions. EHO's would either be employed within the broad based district team which is multi functional (please see appendix 1 District Environmental Health Teams 1 Bridgend, 2 Cardiff, 3 Vale of Glamorgan) covering the following:-

- Routine Inspection of Food Premises Food Hygiene
- Routine Inspection of Food Premises Food Standards
- National Food Hygiene Rating Scheme
- Consumer Complaints + Business Advice – Food Safety Act
- Health and Safety – Interventions at low risk premises
- Health and Safety – Consumer Complaints at low risk premises
- Smoke Free Inspections
- Noise Control – statutory noise nuisance
- Night Noise Service (Cardiff)
- Nuisance – Fumes ,Gases, Odours, Smells, Light Pollution, Accumulation
- Housing Standards – Enforcement
- HMO – Licensing (mainly Cardiff)
- Demolition Orders
- Planning consultations
- Licensing Act 2003 –applications, variations, TENs, investigation of Public Nuisance, Committee Hearings and Appeals

Or they would be employed within the specialist team (please see appendix 1 Specialist Environmental Health Team A) working across the piste Bridgend;Cardiff and the Vale of Glamorgan covering the following functions:-

- Training Food Safety
- Sampling Food Safety / Food Standards
- Private Water Supplies – Monitoring and Risk Assessments, including their periodic review
- High Risk – Health and Safety Inspections
- Accident Investigations
- Training – Health and Safety
- Event Safety
- Infectious Disease Control
- Licensing of Cooling Towers – Control of Legionnaires Disease
- Air Quality – Air Quality Reviews and Assessments
- Contaminated Land – Control of Contaminated Land
- Planning Consultations including full, outline, requirement for EIA and discharge of conditions which can include the review of large and complex Noise and Contaminated Land Reports
- IPPC / Permitted Premises
- Pest Control – Complaints, Proofing, Commercial Contracts
- Animal Welfare

- Stray Dogs – Kennels
- Drainage
- Filthy and Verminous Premises
- Clearance Area
- Licensing of Private Sector Housing
- Action on Empty Properties
- Disabled Facilities Grants + Other Grants
- Caravan Sites
- Port Health – Airport and Docks
- Burial of the Dead / Public Health Funerals
- Anti-Social Behaviour
- *Analytical Services (Cardiff)*

It would be worth stating at this point that within TradingStandards(TS), there are primarily two distinct roles. That of a Trading Standards Officer (TSO) and that of a Consumer Protection Officer (CPO) Vale of Glamorgan or Fair Trading Officer (FTO) Cardiff and Bridgend. Generally, the roles are not operated as a two tier system and the CPO post undertakes most elements of the TS function, with Metrology being one of the only areas where a CPO cannot undertake enforcement work. CPOs and FTO's can be involved in complex investigations and high risk visits.

Within the proposed 'Collaboration with Competency' model TSO's and CPO's / FTO's would either be based in a single generalist team (please see Generalist Trading Standards 4 appendix 1) serving all 3 Authorities or a single specialist team. With reduced staff levels and more natural cross border functions in Trading Standards it makes sense to merge and collaborate the generalist and specialist sections. The generalist section covers the following functions:-

- Fair Trading including inspections and investigations
- Consumer Safety
- Product Safety
- Consumer Advice & Education
- Health and Safety – Petrol + Explosives
- Under Age Sales – Intoxicating Substances; Tobacco; Knives ; Video Recordings ; Aerosol Paints
- Doorstep Crime
- Consumer Credit
- Enterprise Act and Civil Injunctions
- Hallmarking
- Business Advice
- BPRs

Or again they would operate across the piste Bridgend; Cardiff and the Vale of Glamorgan (please see appendix 1 Specialist Trading Standards Team B) covering the following highly specialised functions:-

- Food and Feed Standards
- Intellectual Property Crime including Copyright, Designs and Trademarks
- Animal Health + Welfare
- Metrology / Weights and Measures
- E-Commerce and Distance Selling, including E-Crime
- Money Laundering and Recovery of Criminal Assets
- Intelligence Handling and Sharing
- *Illegal Money Lending Unit (Cardiff)*

Licensing staff would carry out their functions at a local level (please see appendix 1 Bridgend 5, Cardiff 6, Vale of Glamorgan 7) with the requisite local accountability:-

- Alcohol
- Gambling
- Pet Shops ; Animal Boarding; Riding Establishments; Zoos; Breeding of Dogs; Dangerous Wild Animals; Performing Animals
- Special Treatments ; Pleasure Boats; Hypnotism; Hairdressers; Street Trading; Sex Establishments; Scrap Metal
- Out of Hours Services
- Administration

Environmental Health Officers working as specialist health and safety officers often within a dedicated health and safety section have specialist health and safety knowledge and experience. They are trained and fully competent to deal with fatalities; and serious accidents caused at work which may not be the case with a generalist officer EHO who covers health and safety as an add on within low risk premises. These cases can be very challenging and resource intensive and so these officers need to be included within a specialist team acting across the piste.

Environmental Health Officers working as specialist Noise and Pollution officers within a dedicated Pollution section have specialist knowledge, experience and qualifications including, in most instances, a post-graduate Diploma in Acoustics. They are trained and fully competent to deal with British Standards based reports, often received as part of a planning application, which is not the case with a generalist officer EHO who covers nuisance as an add on within their duties. Noise, Air Quality, Water and Contaminated Land based requests and cases can be very technical, challenging and resource intensive and so these officers also need to be included within a specialist team acting across the piste as well as in as local teams to cover the obligations put on the Local Authority.

An EHO or Environmental Health Practitioner (EHP) must have qualified from a CIEH-accredited course in environmental health and hold the Environmental Health Registration Board Certificate of Registration in Environmental Health (or equivalent). Holding a Higher Certificate in Food Premises Inspection, holding a degree in environmental health on its own or working as a technical officer, for example, do not allow you to work as an EHO/ EHP.

There are clearly defined requirements within the Code of Practice for officers involved in food hygiene who undertake food hygiene inspections. These include the following:-

- Appoint a suitably qualified & experienced lead Environmental Health Officer (EHO) to take lead operational & management responsibility.
- Qualifications required to carry out official controls e.g. inspections
 - for premises risk rated A or B or that supply 'substantial' numbers of consumers e.g. food factories = EHO or Higher Certificate in Food Premises Inspection
 - For premises risk rated C-E = at least the Ordinary Certificate in Food Premises Inspection
- Enforcement
 - Hygiene Improvement Notices = EHO or holder of Higher or Ordinary Certificate
 - To serve Hygiene Emergency Prohibition Notices (i.e. close a premises) or Remedial Action Notices = EHOs only, with 2 years post qualification experience in food hygiene.

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- All must be competent, knowledgeable & experienced in technical matters. If have not worked in food hygiene for over 2 years or newly qualified then needs 3-6 months structured training or longer depending on competency assessment.

A person inspecting food premises for or on behalf of a Food Enforcement Authority should be either qualified as an Environmental Health Practitioner (EHP), an Official Veterinary Surgeon (OVS) or hold the Higher Certificate in Food Premises Inspection (HCFPI).

The HCFPI's assessments are designed to test a candidate's knowledge in this specific area of work. It does not cover food quality in terms of fitness.

To obtain the HCFPI candidates are required to:

- Complete an [accredited course](#) of study
- Apply for [partial registration with EHRB](#)
- Undertake a minimum of 6 months of practical training and complete the [HCFPI logbook](#)
- Complete the [HCFPI professional interview](#)

To seize & detain food Officers must also obtain Higher Certificate in Food Control

The Higher Certificate in Food Control (HCFC) was developed to allow non-EHP's employed by Food Enforcement Authorities to inspect, seize and detain food. The HCFC differs from the Higher Certificate in Food Premises Inspection (HCFPI) because it allows non-EHP's to meet the requirements of the Code of Practice relating to the inspection, detention and seizure of foodstuffs and food standards official controls in addition to the requirements for the inspection of food premises.

To obtain the HCFC candidates are required to:

- Obtain the HCFPI of EHRB
- Complete an accredited Food Standard module and the associated assessments
- Complete an accredited Food Premises Inspection module and the associated assessments

Upon successful completion of all elements candidates are awarded the HCFC of EHRB and their names appear in the HCFC register.

Additional on-going requirements include the following:- Additional HACCP training; Course attendance 1 day per week for 30 weeks; Additional time required to complete log book ; Cost of additional qualification for officers to seize & detain food.

EHOs carrying out both general and specialised roles in relation to noise are expected to obtain the Diploma in Acoustics. The Diploma is the leading specialist qualification for the professional practitioner in acoustics and is recognised as being the equivalent to the first year of acoustically-related MSc courses. EHOs dealing with noise related issues are expected to have the Diploma so to be able to provide expert advice and opinion in Court and at appeals be they to the Planning Inspector or Committees.

The benefits of employing TSO's and EHO's are many, as opposed to the limited benefits of non professionals. Both are recognised professions by the public, politicians, businesses, external agencies and the media. These are professions that adhere to strict codes of conduct (they are judged on their integrity, their moral conduct and their ability to remain independent throughout their career) and undertake training in the same way that a solicitor or a chartered accountant would. Individuals wishing to join these professions will have to undertake a high level of education and then complete professional, competency based assessments set by professional bodies. Throughout their career they are expected to undertake continued professional development. These are skilled individuals that should not be undervalued or underestimated.

EHO's are tested to ensure they maintain a level of competency that is expected of a true professional. Their knowledge is in depth and detailed. They gain the trust of businesses by understanding their fields and being able to discuss issues with intellect. All are tested on their abilities to communicate (written and verbal), negotiate, recognise and mitigate risk and protect health. They are multidisciplinary and therefore an asset to their employer who can use them in many varied roles and situations, if that employer thinks laterally. They are not simply an auditor and if they

are replaced by auditors then these many skills will be lost from a service. Adaptability and proactive skills will be replaced by reactive and inflexibility.

A service that employs auditors rather than professional, skilled officers will be one that long time will be able to tick boxes for targets, but will not provide a service that saves money, adapts to situations or prevents incidents before they commence. In essence they will not be providing public protection service; they will be providing only a regulatory resolution service. At a time when we are being encouraged to educate, rather than enforce would this not be a dangerous decision.”

5.5 Multi Functional Teams

A real concern is that the structure provided for by the ‘Collaboration and Change’ model would significantly reduce public health standards to the lowest standard across the three authorities. If officers are expected to undertake functions and responsibilities from other disciplines for which they are not competent and for which they will only receive minimal training the new service is being set up to fail. This would include seeking to get EHO’s trained and competent in metrology, pricing and fair trading and TSO’s trained and competent in health and safety and food hygiene as suggested in the Atkins report. (please see Training section for further details).

EHO’s do receive a broad based training covering the functions included within the proposed neighbourhood services team and commercial services team within the ‘Collaborate and Change’ model. However there are already EHO’s working successfully within multi disciplined teams covering food hygiene; food standards; infectious disease; health and safety in low risk premises and no smoking. As well as teams that cover nuisance; noise; environmental permitting; land, air and water monitoring and assessment; Licensing and Planning consultations and Public Health Funerals amongst other duties.

The ‘Collaboration with Competency’ model proposes that Neighbourhood services (noise/nuisance etc.) and Commercial Services (food safety; food standards; health and safety in low risk premises etc.) should be undertaken by District EHO’s supported by technical officers. Thus instead of having separate Neighbourhood Services Teams and a Commercial Services Teams as envisaged by the ‘Collaborate and Change’ model there should be one combined District EHO Team which would undertake this full range of environmental health functions. The advantages of these multi skilled District Teams include:-

- A higher degree of resilience across the service
- Ability to deal with a range of issues in one visit
- Use of full range of skills available to professional EHO
- Reduced level of visits to a range of premises
- Increased ability to respond to emerging situations

These district EHO's would be able to cover a broad range of duties for which they have previously been trained, although obviously this may have been some years ago. Some of these EHO's may require refresher training to gain full competence but they would not require full training from scratch as they would from another discipline e.g TSO. This single District EHO team system would ensure that there is sufficient cover and support within the team to mitigate the effects of further job losses. Another strength of the district EHO format is that it is fully tried and tested having previously been used for many years. It is recognised by the public and businesses and if linked with the electoral ward system facilitates the Member / Officer relationship.

Furthermore if there are issues with sickness / leave thus leaving some areas of the district EHO cover short staffed it will be easier to move staff within authorities and across authorities. There is thus more flexibility with the 'Collaborate with Competency' model.

Thus the 3 Local Authority Collaborating Partners would have their core regulatory environmental health service officers broad based and multi functional within the core sections of 1,2,3 of the model (please see appendix 1). They would still all need to agree however to those functions that are included within the specialist teams A - Environmental Health & B – Specialist Trading Standards and who would be working across the 3 authorities. Staff suggestions as to this split of functions between generalist and specialist are as shown in appendix 1.

5.6 Resilience

The claim is made by Atkins that the 'Collaboration and Change' model will achieve resilience but does not explain how. The proposal delivers reduced resilience in splitting environmental health (Commercial Services) and environmental health (Neighbourhood Services). The 'Collaboration and Change' model then introduces the bizarre notion of merging professional environmental health officers with professional trading standards officers to form a Commercial Services Officer. This would be akin to merging HR officers with those from the Legal department. It is highly unlikely that a 'pot pourri' Commercial Services Officer will be competent in the full range of professional knowledge and skills from environmental health and trading standards. If they are not competent then they cannot provide resilience. The training, skills and competencies whilst similar in some respects for EHO's and TSO's is also quite different.

The main reason for the proposals is that the emerging Regional Regulatory Service for Bridgend; Vale of Glamorgan and Cardiff has to be resilient. On their own with the level of required cuts the smaller departments of the Vale of Glamorgan and

Bridgend would not be resilient and may not even be viable. A crucial aspect of resilience is whether a service can retain staff and recruit when necessary. If the new service drops the professional EHO and TSO positions and adopts the new untried and untested Commercial Services Officers and Neighbourhood Services Officers then it is likely to experience severe retention and recruitment difficulties.

The high risk activities delivered by Environmental Health where resilience is critical include: - Infectious Disease Investigation and Control, Food Safety Investigations; Fatal Accident Investigations; Chemical Incidents. These activities cannot be delivered by Trading Standards staff as they would not be deemed to be competent in these areas.

Better resilience would be achieved by not splitting Environmental Health (Neighbourhood Services) away from Environmental Health (Commercial). This is the proposal for the 'Collaboration with Competency' model where District EHO's would be supported by technical officers. It should be noted however that Trading Standards have competencies where Environmental Health Officers do not e.g. Animal Health, Petroleum, Explosives, Product Safety.

Increased trading standards resilience will be achieved by merging staff into two teams either generalist or specialist. By allowing TSO's to focus on their strengths and competencies within a generalist or specialist team rather than attempting to dilute and distract them with health and safety and food hygiene duties and responsibilities (EHO functions) they will remain resilient.

Similarly increased environmental health resilience would be achieved by allowing EHO's to focus on their strengths and areas of significant risk rather than attempting to dilute and distract them with metrology, pricing and fair trading (TSO functions) as proposed in 'Collaborate and Change'.

There is little mention of lead officers within the 'Collaboration and Change' model although there is clear reference and concern for resilience. However because of the proposed drastic reduction in staff numbers whatever the new structure looks like resilience will inevitably suffer. Specialist knowledge is required to deliver an effective and timely response to infectious disease/food poisoning outbreaks (a high level of competency is required by the All Wales Outbreak Plan); fatal accident investigations and serious chemical incidents. There are certain environmental health functions which sit best within a specialist section which can operate across the piste Bridgend; Cardiff and Vale of Glamorgan Councils. This specialist group would naturally include the following functions:- High Risk Health and Safety Inspections; Accident Investigations; Air Quality; Contaminated Land ;Private Water Supplies; Burial of the Dead; Port Health etc. which will provide improved resilience across the 3 authorities.

5.7 Training

The Atkins report 'Collaboration and Change' model is factually incorrect in relation to the qualifications required to undertake food hygiene inspections & enforcement activities and the costs that would have to be incurred to ensure that Trading Standards Officers become qualified to undertake these activities.

The Food Law Code of Practice (Legal Requirement) states that certain establishments should be inspected only by Environmental Health Officers or officers holding the Higher Certificate in Food Premises Inspection. Certain critical enforcement action can only be undertaken by Environmental Health Officers. If the intention within 'Collaborate and Change' model is to train non-qualified officers up to the Higher Certificate Level which is expensive i.e. approximately £1650 and time consuming i.e. at least a year, has this been costed within the model? This raises further questions as to who will train these officers and where will they train (no courses available in Wales) There are only 3 accredited courses nationally (Higher-Nottingham, Surrey and Birmingham). There do not appear to be any course providers for the Ordinary Certificate.

Similarly the Atkins report (page 21) proposes EHO training for metrology within the 'Collaborate and Change' model at £300 each for 17 officers. Trading Standards (TSO) colleagues state that metrology is an intense and expensive course that usually costs around £2,000. A Trading Standards background prior to course enrolment is usually assumed.

The Atkins report (page 21) 'Collaborate and Change' also proposes TSO training in Health and Safety. To achieve a level of health and safety training to enforcement standard level cannot be achieved in a brief time and is not cheap. Again it cannot be obtained for £300 for 7 officers as suggested to produce competent health and safety officers.

With regards the IOA Diploma in Acoustics the course fees, vary between Institutions, but are approximately £3,700 with the course taking on average 12 months. The normal minimum requirement for admission to the Diploma in Acoustics and Noise Control is a degree in a science, engineering or construction-related subject.

Training costs will be significantly less with the 'Collaborate with Competency' model which plays to officer's strengths and present skills and abilities. However training costs are still going to be incurred with the 'Collaborate with Competency' model. But these will tend to be for refresher type/ updating courses where officers have not dealt with certain aspects of their profession for some time.

5.8 Support Services

Administration and support activities and services would support core regulatory environmental health service district teams, generalist trading standards team and the two specialist teams. The Atkins report states on page 93 '*Customer contact for regulatory services should continue to be managed via the existing contact centres at the participating councils. Diverting demand to a central contact centre away from other council services is likely to create confusion for local residents and businesses.*' This makes sense and would work well with core services retained in house within the 'Collaborate with Competency' model. However the charges that regulatory services contribute to their respective contact centres are likely to be significant so other customer contact systems should also be considered.

Administrative support teams have been significantly cut over the last few years. Cutting more administrative staff will result in higher paid officers having to do their own administration work when officers should be out in the field. Further cuts to administration would clearly be a case of "false economy".

The Atkins report states on page 94 '*Legal support services should remain with the participating councils as decisions to proceed with legal actions should be a sovereign responsibility. This should include liability for the costs arising from any legal actions.*' Yes it is only right and proper that legal actions should be a sovereign responsibility and that each authority should be liable for the costs arising from their individual actions. However there is no reason why there should be no change to the way legal support is provided. At present it is an expensive service and will continue to be so if there are 3 legal departments providing the same service to all 3 collaborating regulatory services.

Why not put out a tender for the legal services contract to all 3 legal departments so that the savings can be used to retain more front line public health staff? Or have a 'host' authority for legal services as is the proposal for HR. Page 84 of the Atkins report states '*There needs to be a greater emphasis on chasing up costs from prosecutions and ensuring the proceeds are credited to the service budget.*' We could not agree more, proceeds from successful prosecutions must in future be credited to regulatory services budgets and not legal budgets. Particularly as regulatory services are absorbing such large cuts.

5.9 IT & Costs

The Atkins report is clearly based on the Worcestershire Shared Regulatory Services model (page 142). This is a joint regulatory service formed in 2010-11 by Worcestershire County Council and all 6 Worcestershire District Councils. The vision was of a fully integrated Regulatory Services function, more effectively focussed on businesses and consumers, with all partners operating within one Management Structure.

However the reality certainly on the IT front has not lived up to expectations. Indeed within the introduction to the Worcestershire Regulatory Services Annual Report for 2013-2014 some 3 years after they merged the following is stated: - *'On the IT front it has been a technologically difficult year, with the implementation of the IDOX Uniform system taking rather longer than originally anticipated, mainly down to supplier failings. Whilst staff are happy with the product, the transfer of data proved very problematic, with some data sets either incomplete or corrupted and we have ended up obtaining compensation from the supplier because of this'*

This should act as a real warning to any thoughts of considerable 'investment' spend on IT. We are already aware of IT black spots in the Vale of Glamorgan where a signal cannot be obtained and these also probably exist in Cardiff and Bridgend. Mobile working for pest control in the Vale of Glamorgan has recently been tried and unfortunately ended in failure. There have also recently been some well publicised big IT projects most notably at the BBC and NHS which have failed. It is common place for these IT projects to run over time and over budget. Members at Scrutiny Committees quite rightly voiced their concerns about IT.

There is little IT commonality between the 3 authorities. Huge IT capital investment is required for the 'Collaboration and Change' model (£523,170). Then there are additional homeworking costs of £242,000 to form a mobile peripatetic workforce. It does not make sense to spend these significant sums of monies when the track record for these IT projects is poor and further considerable IT change is on the horizon with the Williams Commission report.

These monies should more wisely be invested in our staff to reduce the number of redundancies and lost posts rather than going to IT consultants and IT suppliers. Our staff are our greatest resource not our IT system. The cheaper more risk adverse option is provided within the 'Collaboration and Competency' model which proposes that the 3 authorities Bridgend; Cardiff; Vale of Glamorgan maintain their existing IT facilities and avoid significant additional IT spend.

5.10 Culture & Morale & Home Working

The proposals within the Atkin's report 'Collaboration and Change' model are vast and far reaching. If followed they would inevitably have a very adverse effect on morale amongst the staff and substantially change the culture. The proposals include change on every front which would only increase the chance of failure and sense of alienation for the remaining staff. The changes include:-

- Significantly reduced workforce
- Collaboration with two neighbouring authorities
- Loss of recognised professions/positions
- Significant change to roles and responsibilities
- Greatly increased workloads across new and unfamiliar areas of responsibility
- Mobile, peripatetic working/working from home / possible isolation.
- Significant IT changes with the risk of corruption / loss of data sets.
- Likely salary reduction

It would be difficult to envisage a proposal for the new Shared Regulatory Service which could introduce greater change. Change is necessary particularly as we face very challenging financial pressures. Staff recognise the need for change but change for change's sake does not make sense.

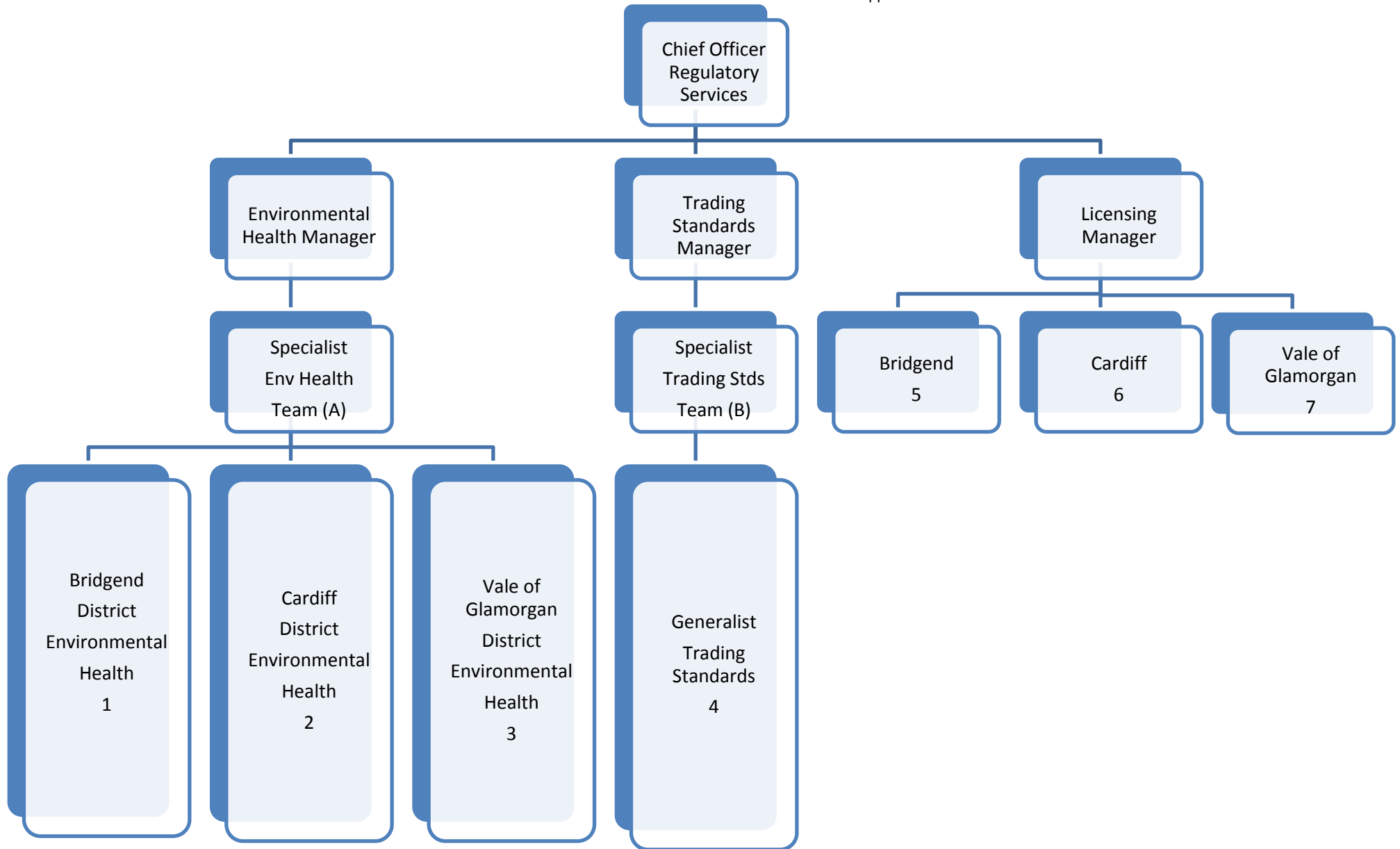
The 'Collaboration with Competency' model seeks to reduce this change down to what is necessary to meet the new financial demands. The emphasis needs to be on our staff and not IT and to use their strengths rather than seek to totally remould those remaining staff. Our staff are our greatest asset.

Home working comes with specific issues, which can be magnified if staff are unlikely to have easy back up from colleagues when dealing with unfamiliar legislation and scenarios. Many staff live well outside the boundaries of any of the three councils, so this could cause issues when reactive work is needed, although it could be beneficial for routine work. Time critical responses to secure evidence could be compromised and this could also cause difficulties for managers.

6/. Benefits of 'Collaboration with Competency' model

The 'Collaboration with Competency' model is proposed which is based on the amended 'Collaboration Only' model within the Atkins report as it offers the following advantages:-

- Delivers efficiencies related to the shared management structure
- It maximises the use of our specialists who will be able to operate across the piste to the obvious benefit of all 3 authorities.
- Takes advantage of the multi skilled officers that are already available who could now cover both Neighbourhood Issues and Commercial Issues on a District/Ward basis
- Easier to move multi skilled district EHO's across authorities if the need arises.
- It best maintains staff morale and professional competencies.
- It provides resilience and strength to Trading Standards by providing for cross-boundary working and collaboration with both a generalist and specialist section.
- Retention and recruitment of staff is improved. The service will be more attractive to colleagues across the UK.
- Despite the cuts it still allows our Members and the Public to identify with the service and maintain a proper relationship with our elected Members.
- It provides the advantages of collaboration with a degree of flexibility for the 3 Authorities. There is greater local accountability.
- It provides for greater resilience than the other models. It provides for a more rapid response to emergencies and unexpected events thanks to the 'Specialist Teams' than the other models.
- A reduced spend on IT means there is a better opportunity to retain more of the workforce and reduce the spend on redundancies.



ENVIRONMENTAL HEALTH – Generalist Sections –Bridgend 1 –Cardiff 2 – Vale of Glamorgan 3

- Routine Inspection of Food Premises Food Hygiene
- National Food Hygiene Rating Scheme
- Health and Safety – Interventions at low risk premises
- Smoke Free Inspections
- Night Noise Service (Cardiff)
- Housing Standards – Enforcement
- Demolition Orders
- *Administration*

Routine Inspection of Food Premises Food Standards
Consumer Complaints + Business Advice – Food Safety Act
Health and Safety – Consumer Complaints at low risk premises
Noise Control – statutory noise nuisance
Nuisance – Fires, Fumes ,Gases, Odours, Light Pollution,Accumulations
HMO – Licensing (mainly Cardiff)
Planning – Consultations

ENVIRONMENTAL HEALTH – Specialist Team A

- Training Food Safety
- Private Water Supplies – Risk Assessments, Review & Monitoring
- High Risk – Health and Safety Inspections
- Accident Investigations
- Infectious Disease Control
- Air Quality – Air Quality Reviews and Assessments
- Pest Control – Complaints, Proofing, Commercial Contracts
- Stray Dogs – Kennels
- Filthy and Verminous Premises
- Licensing of Private Sector Housing
- Disabled Facilities Grants + Other Grants
- Port Health – Airport and Docks
- Burial of the Dead (Public Health Funerals)
- Anti-Social Behaviour
- Noise assessments/reports/notices etc e.g BS4142, COPA
- High profile planning applications

Sampling Food Safety / Food Standards
Mains Water Enquires
Event Safety
Training – Health and Safety
Licensing of Cooling Towers – Control of Legionnaires Disease
Contaminated Land – Control of Contaminated Land
Animal Welfare
Drainage
Clearance Area
Action on Empty Properties
Caravan Sites
Analytical Services
Environmental Permitting Inspections and Responses to Complaints
Licensing of Regulated Entertainment (inc TEN apps), applications, variations and complaints
Administration

TRADING STANDARDS– Generalist Section - 4

- Fair Trading including inspections and investigations
- Consumer Safety
- Product Safety
- Consumer Advice & Education
- Health and Safety – Petrol + Explosives
- Under Age Sales – Intoxicating Substances; Tobacco; Knives ; Video Recordings ; Aerosol Paints
- Doorstep Crime
- Consumer Credit
- Business Advice
- Hallmarking
- Enterprise Act and Civil Injunctions
- BPRs
- *Administration*

TRADING STANDARDS – Specialist Team B

- Food and Feed Standards
- Intellectual Property Crime including Copyright, Designs and Trademarks
- Animal Health + Welfare
- Metrology / Weights and Measures
- E-Commerce and Distance Selling, including E-Crime
- Money Laundering and Recovery of Criminal Assets
- Intelligence Handling and Sharing
- *Illegal Money Lending Unit (Cardiff)*
- *Administration*

LICENSING

- Alcohol
- Gambling
- Pet Shops ; Animal Boarding; Riding Establishments; Zoos; Breeding of Dogs; Dangerous Wild Animals; Performing Animals
- Special Treatments ; Pleasure Boats; Hypnotism; Hairdressers; Street Trading; Sex Establishments; Scrap Metal
- Out of Hours Services
- *Administration*

Mr Rowan Hughes
Environmental Health Officer
Civic Offices
Vale of Glamorgan Council

12th September 2014

Dear Rowan

**Regionalising Regulatory Services: Collaboration with Competency
Response from Staff and UNISON – Vale of Glamorgan Council**

Thank you for your response to the Regionalising Regulatory Services proposals as set out in the draft Cabinet report and related appendices. I understand that the submission was submitted on behalf of UNISON and staff members within the Vale of Glamorgan Council on the 5th September 2014. It is not clear whether the submission is from all staff or confined to UNISON members only.

Firstly, please accept my thanks for taking the time and trouble in responding and for seeking the views of your colleagues and submitting an alternative proposed operating model. This demonstrates a clear commitment to the service and the delivery and prioritisation of public protection across the three authorities.

Your submission will be included as one of the appendices to the report to Cabinet on 22nd September along with this response. The main report has also been amended to build in some of the relevant themes from all the feedback received and to take on board some of the really helpful suggestions.

As project officer for this collaboration exercise I have reviewed the submission with the help from some of the workstream leads on the project group. A summary of the main views are set out below:-

- The submission, "*Collaboration with Competency*" seeks to build on the strengths of the "collaboration only" model outlined in the Atkins report, with some structural amendments of having a combination of authority led "district teams" and "cross authority specialist teams".
- There is recognition within the document that a collaboration approach is a better decision than the "no change" option for the service delivery, but you have put forward a different method. It seems that the submission strives to make the required financial savings as a result of reducing the headcount of managers and avoiding the need for an investment on ICT infrastructure.

- The submission sets out the proposed advantages in adopting the alternative model but unfortunately does not include any significant detail or substance to support the assertions in document. Issues such as, the decision not to invest in ICT, the retention of the traditional professional silos, recommendations on the management of support functions and the lack of financial data cast some doubt on the validity and robustness of this proposal.
- It is however accepted that Unison have only had a limited time to construct their proposal and, until recently have not had access to the “indicative” grading information as set out in the hitherto redacted Appendix N spreadsheet. That said, the ‘*Collaboration with Competency*’ proposal has clearly not been subjected to the same costing exercise and rigorous Scrutiny process as had been the case in relation to the ‘Collaborate and Change’ model has.
- With respect, however it is felt that the Unison submission has a number of shortcomings. There are no staffing figures in the proposal yet there is an inference that the headcount figure will not be reduced (beyond reductions in management levels); the assertion being that this revenue cost will be balanced by the lack of capital spends on ICT.
- It is strongly argued that the investment in ICT is a necessary part of service sustainability going forward. Such investment is, however a “one-off” cost and will not impact on the annual recurring costs of the service. The difference between ongoing revenue commitment and short term and “one-off” capital commitment is a critical issue. The majority of the ICT costs will be met from the Regional Collaboration Fund (RCF) and therefore will not impact unduly upon each authority’s budget. There are strict terms and conditions attached to the RCF grant which do not provide for on-going staffing costs.
- The risks and costs of ICT infrastructure development, as properly highlighted in UNISON’s submission, are recognised. As suggested we do need to learn the lessons from other successful and less successful projects and build in the engagement and expertise from within the service. Such risks will, however be mitigated by a properly resourced development plan and project team. There is always an element of risk with any changes to an existing ICT regime, but the project is significantly less complex than the Worcestershire project mentioned in the Unison submission.
- The Unison document notes, “*There is little IT commonality between the 3 authorities. Huge IT capital investment is required for the ‘Collaborate and Change’ model (£523,170). Then there are additional homeworking costs of £242,000 to form a mobile peripatetic workforce.*” The claim made that there is no commonality between the 3 authorities is not correct. The three local authorities use the same software – Flare – it is just used it in different ways. The costs associated with moving to this new way of working is a “one off” investment, yet the benefits of the costs savings and efficiency in terms of staff time will be significant in the long term. Staff will have better access to information when on

site, improving the service to customers by responding quicker. This is integral to the vision of the new service.

- The proposal within the “*Collaboration with Competency*” submission seems to suggest that the Councils would continue to run three different systems, which would have three times the overheads, in terms of hardware, service costs and software requirements and wouldn’t be able to achieve the efficiencies of the new ways of working.
- The need for a radical proposal (and the dangers of continual “salami slicing”) are properly recognised in the introduction to the “*Collaboration with Competency*” proposal, but not developed in the detailed proposals. The submission suggests that there would be savings as a result of headcount reductions. Whilst this is clearly the case in relation to management posts, it is not clear where such reductions would be achieved elsewhere in the structure.
- It is suggested that a reduction in staffing levels (as envisaged within the submission) would be hard to achieve if the service was based on a hybrid model of both ‘authority specific districts’ and generic specialist areas. The proposed model does not provide any costing information and particularly in relation to redundancy or service investment. The evaluation of the proposal is difficult without this basic financial information and detailed quantification.
- It is not clear within the submission whether the “*Collaboration with Competency*” option is based on an initial TUPE like transfer. Without a TUPE transfer, however, the service would be vulnerable to inevitable frustrations about different terms, working practices and cultural differences. The cost and inconvenience of maintaining such a service through support functions from three separate authorities would be inefficient and unwieldy.
- The advantage of a TUPE like is that staff will fall within the auspices of one employer and therefore providing a strong platform for “whole service” development, sharing of good practice, movement of staff across the shared service, the movement over time to shared terms and conditions. Without the change in service as set out in the “collaboration and change” model it is argued that the ability to retain the resilience of the service will be lost (in the face of continuing budgetary pressures) and the opportunities for income generation, fundamental service improvement, maximising resources, achieving efficiencies, developing a new service with a single vision will be limited.
- The “*Collaboration with Competency*” submission is also based on protecting the professional disciplines between specialists in service areas (i.e. between Environmental Health Officer and Trading Standards Officer). However, this proposition does not consider the service demand analysis undertaken and the capacity and competence of technical officers needed across the three authorities. The success of the service (in whatever shape going forward) will depend on the retention of the skills, professionalism and experience of staff in all specialist areas). Multi-disciplinary working is already a feature, to a varying

degree across the three Council's and will continue regardless of whether this project continues or not.

- The need to communicate the changes in the service to the public and business owners is well made in the Unison submission. There is no evidence, however that any change in job titles will, in itself undermine such confidence. That said there will be scope within the post transfer consultation period to fully explore concerns about job titles and the professional status of officers.
- As indicated above there have been a number of concerns about the loss of professional skills and denominations of officers. This concern is well understood and well-articulated in the UNISON submission. It is accepted that there is a need to retain some reference to the Environmental Health, Trading Standards and Licensing disciplines within the teams. The Atkins structure is only an indicative structure based on the underpinning-operating model. As indicated the post transfer remodelling consultation process will provide significant opportunities to refine and develop the new service structure based on the continuing views of staff and the trade unions.
- This will include further consultation on the job roles in any new structure, the development of job descriptions and person specifications and specific discussions on the roles of Neighbourhood Services Officers and Commercial Services Officers to accommodate, where possible the concerns as set out in the "*Collaboration with Competency*" submission. This is particularly important in maintaining the profile of the professions, and the new service moving forward.
- The concern about professional status has and will be considered during the formation of the job specifications, and further considered during the formation and population of the new Operating Model. It is important to stress that the operating model is intended to provide as comprehensive a service as possible within the resource available. That said, the financial constraints placed upon the proposal mean that the new management team must assess the Operating Model and balance service provision against available resource. The need to make savings impacts upon all three Councils whether they choose to pursue the collaborative model or not. If the Councils choose to reject the collaborative proposal there can be no guarantee about the future level of service provision and measures may need to be considered that could result in a significant change in service delivery.
- The lengthy and relevant discourse on the need for competency across a range of functions is acknowledged and agreed, but whether in a new service, or a continuation of the status quo, there will be a need for officers to exhibit a broader range of skills and knowledge to reflect the demands of the job and new structure. This is positive for staff development, learning new skills, taking on new challenges and getting a broader range of experience.
- There are a number of comments within the UNISON submission about support services and specifically in relation to the provision and cost of Legal support. Legal Services costs have for a number of years been charged to client

departments based on 'real' time working for each client department. Procedures are already in place for the recovery of legal costs but sometimes recovering money from "Men of Straw" is unfeasible. Previous assessments have also shown that it does not follow that the private sector would be better placed to provide a more cost effective/quality service. Given the wide ranging work load of lawyers advising Regulatory Services, a host arrangement for legal services beyond the existing proposal would not be cost effective.

Thank you again for your submission and I hope that my responses above are helpful. Whilst I do not expect that we will agree on all of the points it is clear that we have a shared view of the need to ensure the resilience of the service in the light of the increasing financial pressures. I think we also have a shared view that such resilience can only be achieved through collaboration. Should the project go ahead, I would welcome the opportunity to continue these discussions.

Collaboration in any form brings with it a range of challenges and difficult decisions. It is clear that indicative organisation chart as originally envisaged by Atkins will need to be refined and further developed to fully realise the benefits of the target operating model. If a decision is made to proceed, the appointed Management Team will need to consider the many issues, suggestions and valid concerns expressed in the range of feedback we have received over recent weeks. I hope that the above response, at least gives you some assurance about the post transfer consultation process and the commitment to staff engagement as part of that process.

If the decision is made not to pursue the collaborative model, then the concerns about service resilience will remain and whichever path each organisation takes, it is inevitable that there will be a need to change how services are delivered and review which services can continue to be delivered. Such re-structuring would be necessary to respond to the scale of savings required within each authority.

The collaboration and change proposal will, as stated in the UNISON submission involve a significant degree of change in the way services are delivered and a significant and potentially unsettling degree of change for our staff. It is strongly argued however that such change will be necessary in order to ensure the resilience of the service and an opportunity to build a new and shared service based on the sharing of best practice, resources and intelligence, the maximisation of flexibility and economies of scale, the development and retention of our staff and a shared and more focused development agenda for the Regulatory service.

If you would like to discuss this response with me in more detail then please do not hesitate to contact me on 029 2087 1830

Yours sincerely



Dave Holland
Project Manager
Regionalising Regulatory Services Project

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