

ROYAL BOROUGH REVIEW OF ENVIRONMENTAL HEALTH AND TRADING STANDARDS

April 2007

Table of Contents

Revision History	4
1. Executive Summary	5
2. Background	11
2.1 Introduction	11
2.2 Description of service areas	11
2.3 The Council's excellent status and changing times	17
2.4 The Deregulation Paradox	18
3. Purpose and Scoping Report	19
4. Challenge	20
4.1 Fundamental Challenge	20
4.2 Challenging performance – how well do we do?	22
4.2.1 Performance analysis	22
4.2.2 Performance for Inspections	25
4.2.3 Performance for Enforcement	26
4.2.4 Performance for Complaints and Enquiries	26
4.2.5 Performance Summary	27
4.3 Challenging traditional ways of working – flexible working	28
4.4 Challenging Organisational Arrangements - is the Department structured to meet future needs?	29
4.4.3 Working within the HHASC business group	33
4.4.4 Working with the PCT - Renewing a public health legacy	33
4.4.5 Is the Department meeting new demands on private sector housing services?	34
4.5 The Future for the Department	36
5. Challenging Costs and Identifying Savings	37
5.1 Background	37
5.2 Overall Budget and Spend	37
5.3 External funding	38
5.4 Options for Savings	38
5.5 Opportunities for raising additional income from charges	39
5.5.1 Training Service	39
5.5.2 Pest Control services	40
5.6 BVPI Framework	41
5.7 CPA Service Assessment	41
5.8 CPA Direction of Travel Assessment	42
5.9 The Value for Money Assessment	42
5.11 Making Savings and Efficiency Gains	44
6. Consultation	45
6.1 Background	45
6.2 Key Findings of the Business/Landlords Survey	47
6.3 Key Findings of Service Users - Telephone Survey	47
6.4 Key Findings of the Resident Reviewers Exercise	48
6.5 Key Findings of the Residents Panel	48
6.6 Key Findings of the Departmental Staff Survey	48

6.7	Key Findings of the Corporate Staff Communication Survey .	49
6.8	Key Findings of the survey of Councillors.....	49
7.	Comparison.....	50
7.1	Key Findings from Comparison Questionnaire	50
7.2	Key Findings from the Comparison Visits	51
8.	Competition	53
8.1	Work that is currently outsourced.....	53
8.2	Opportunities for increasing outsourcing	54
8.3	Conclusions	54
9.	Cross-cutting themes	55
9.1	Personnel Information.....	55
9.2	Key Findings on Personnel Information	55
9.3	Administration	56
9.4	Information Technology	56
9.5	Community safety	58
9.6	Sustainability.....	59
9.7	Freedom of information requests.....	59
9.8	Diversity and Equalities Impact Assessment (EIA)	60
10.	Savings - Option Analysis.....	62
10.1	Option 1.....	62
10.2	Option 2.....	63
10.3	Option 3.....	65
11.	Efficiency Gains	71
12.	Summary and conclusions.....	72
	Service Improvement Plan.....	74
	Abbreviations and acronyms	84
	Background Papers.....	84
	Appendices.....	85

Revision History

Revision date	Version	Summary of Changes	Changes marked
23 Jan	0.1-.12	Draft outline, Executive summary and finance added.	
21 Feb	2.0	Structure, Public Health and Vision added.	
	3.0	Re-ordering of structure and options, addition of competition	
12 th March	3.0	First read through and edit	PHM
13 March	3.0	Redraft of executive summary, addition of IT, Admin and performance.	ALR/MRC
14 th March	3.0	Review and edit	PHM
15 th March	3.0	Edit of personnel section and addition of SIP	ALR/MRC
15 th March	3.0	Edit of finance	SM
15 th March	3.0	Edit of VFM	CW
16 th March	4.0	Circulation to Board and DMT Re- ordering of challenge and financial challenge, précis of equalities and addition of JD comments on Executive Summary. Insertion of structure charts	PHM/ALR/MRC
21 st March	4.1	Paul Gold's, GPD, TPK, CA's comments added. FOI, sustainability and option analysis paragraph	
22 nd March	4.2	Précis of competition, admin and IT added. Modernisation, CALM and Community Safety added, revision of Exec summary and finance sections.	
24 th March	4.3	Comprehensive edit down to reduce length; further revision of exec summary and options sections	ALR
25 th March	4.4	Minor edit of presentation and inclusion of revised SIP and removal of sections to appendices. Additional edits from PHM	ALR
27 th March	5.0	Version sent to Cllr Buxton. Completion of option 3 value. Numbering	ALR
29 th March	5.0	Comments from RBR Board incorporated. Sent to Councillor Warrick and Councillor Moylan.	ALR
4 th April	5.1	Addition of DM and Cllr Buxton's comments	ALR
7 th April	5.1	Further edit to incorporate Cllr Moylan's/Mr Myers' comments	ALR
10 th April	5.2	Further edit	PHM
12 th April	5.3	Final check	ALR
17 th April	5.4	Addition of Cllr Warrick's comments	MRC

1. Executive Summary

The full cost of Environmental Health and Trading Standards including all overheads is £7.89 million and the service employs around 80 staff (excluding the Noise and Nuisance team). The controllable costs (salaries, income) amount to £3.85 million. A detailed breakdown of what is done is given in paragraph 2.0 (see page 11) of the report.

This Review has challenged whether everything Environmental Health and Trading Standards does actually needs to be done; whether the Department should do it or whether someone else can; how well we do the job; and whether the service meets the Borough Aims and offers good value for money. The results draw on extensive consultation with Councillors, staff, residents, and business which show that the services are highly valued (see the results of consultation set out on page 45). The savings expected are £77,000 (calculated as 2 per cent of controllable budgets). The recommendation of this Review would offer cashable savings of £157,000, non-cashable savings of £37,500, and a number of efficiency gains – a savings total of £194,500.

Alongside its regulatory services, most of which fulfil statutory requirements, the Department provides some discretionary services. This Review offers Members a number of options that would re-define the Department's service offer. These options include withdrawal of investment from discretionary services, and reductions in the investment made in statutory regulatory functions.

This is a challenging time for the Department as it tries to achieve a balance that gives the right amount of regulatory protection for residents and the public, while responding to the demand for increased efficiency (wanting more for the same or less) and government pressure to lessen the regulatory burden on business.

Finding this balance is not easy. While government and business pursue an agenda of reduced regulation, the public expect high levels of protection, as illustrated by the reaction to the recent contamination of unleaded petrol and the fear of avian flu (see page 33 and Appendix 3). The Rogers report has identified five national enforcement priorities four of which (air quality, food hygiene, health and safety in the workplace, and fair trading) fall within the Department's remit, and the fifth (alcohol licensing) will make big demands on the Noise and Nuisance service. Rogers chose these priorities for local authorities on the grounds that they addressed the most significant harm, responded to the highest levels of public concern, provided the greatest opportunity to make a difference to

outcomes, and could be dealt with by each local authority independently of what other authorities do. It is likely that these priorities will become a component of future Local Area Agreements, as they are associated with the Government's policy priorities of safer stronger communities, children and young people, economic development and environment, healthier communities, and older people.

Members will have a view about whether the local emphasis should be on providing protection for residents and others, or on lifting regulatory burdens from businesses. Members will have a view on the extent to which the investment of Council taxpayers' money should be directed towards the national enforcement priorities identified above. Members will also have a view on the scope of modern 'public health' work. This Review makes recommendations on these matters, but final decisions remain with Members.

The Review makes seven recommendations:

Gain efficiencies through improving the Department's structure – During the re-alignment of Business Groups, Members wanted to retain a coherent and identifiable Environmental Health and Trading Standards service. However, the Department is not best configured to respond readily to corporate or external demands, nor to handle the cross-cutting approach demanded by a wide range of agenda: public health, community safety, and sustainability. A managerial re-structuring is proposed that would mean a de-layering of management in the Department and two less managers overall. No changes are proposed to front line staffing levels although there will be some job re-definition. This will offer savings. It will create the capacity to respond better to change and facilitate better relationships with the PCT (Primary Care Trust), providing the leadership and drive to enable the implementation of the public health strategy.

Maintain high levels of performance and continually improve – The Department has followed a traditional model of professional excellence which has resulted in high standards of public protection for residents. The challenge on performance and enforcement activity confirmed that the Department's overall performance was very good. (See pages 21 to 27) It is recommended that the Department should continue to prioritise the protection of residents and others, and should take care to ensure that pressures for deregulation do not lead to a service offer that falls short of residents' reasonable expectations.

Improve the customer experience – Feedback showed that residents value a swift response to their problems and good communication about progress. The evidence suggests that the service could do better in complaint handling. The service improvement plan (SIP) presents plans to build on our consultation findings to deliver excellent services e.g. the immediate move to a first response target of 1 day for all types of complaint.

Improve residents' and customers' awareness of the services offered - Consultation shows that the service is valued although residents' awareness of it is not as high as it could be. The SIP presents enhanced methods of communication to address this, particularly through the Internet.

Continue to monitor factors which influence the BVPI and CPA framework - The unit costs of parts of the service are higher than in most other authorities for various reasons including our central London location and the higher quality of service offered compared to other Councils (see page 42 value for money). Current performance is very good and the number of enforcement actions taken is far greater than in other London boroughs. A rationalisation of overly bureaucratic processes and a reduction in accommodation overheads is proposed. The SIP presents changes which will bring down unit costs and will also offer efficiency gains which mean that the council taxpayer will see more and better services for no additional cost.

Develop and diversify the workforce – Nationally, Environmental Health and Trading Standards Officers have become increasingly scarce. However the Council's reputation for professionalism has to some extent insulated the borough from the recruitment challenges faced elsewhere. That said, the stability of the workforce has skewed the age profile, become a barrier to change in the workforce profile, and stretched salaries budgets which are calculated on the mid-point of pay scales. The SIP presents plans to remedy these weaknesses in the context of the HHASC Workforce Development Strategy.

Engage with neighbouring boroughs on shared services - Considerable efforts have been made to engage with other boroughs on this both through individual approaches to local authorities and through the West London Alliance (although Kensington and Chelsea is not formally a member). The focus for shared services currently is on common processes such as personnel and benefits with the consequence that there is reluctance in other boroughs to expend energy on investigating the scope for shared services in Environmental Health and Trading

Standards where the savings would be modest and the difficulties in reconciling different services are high. However, good links have been made with Hammersmith and Fulham and there is a real possibility of joint working with them on disabled facilities grants, and clinical waste collection. The SIP also proposes an evaluation of joining the Brent and Harrow Trading Standards Consortium (that currently handles Weights and Measures).

Options for savings

The above findings lead to the following options for savings. These should be taken in the context of a real reduction in the Environmental Health and Trading Standards costs of 15 per cent over the last 5 years:-

Option 1 (recommended by officers)

Adopt the proposed SIP. The key features are management restructuring, rationalisation of bureaucratic processes, the continuation of the Modernisation Programme, and re-investment of identified cashable efficiency gains back into the service.

This option will offer:-

Cashable Savings	Value
Reduce management posts	£30,000
Reduce IT Licences	£20,000
Reduction in office space *	£105,000
Cashable efficiency savings*1	£22,000
Total	£177,000
Restoring RBR Noise and Nuisance investment*2	-£20,000
Net saving	£157,000

Non Cashable Savings	Value
Removal of unused staff parking spaces	£10,000
Non-cashable efficiency savings *1	£27,500
Total	£37,500

Net total Cashable and Non Cashable Savings	£194,500
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* Further detail on this saving is at page 63

*1 Further detail on efficiency savings is in section 11 and Appendix 11. A total of £49,500 is offered through efficiency gains.

*2 At the conclusion of the RBR of Noise and Nuisance Members agreed to re-invest in the service the £20,000 savings identified.

Option 2 (not recommended by officers)

Continuing the 'Modernisation Programme' allowing the management of the Department to improve services and achieve efficiency gains that over time will see the Department being able to do the same job with less people. This approach has produced an average annual cost saving of 3 per cent over the past 5 years.

This option will offer:-

Cashable Savings	Value
Reduce IT Licences	£20,000
Reduction in office space *	£105,000
Cashable efficiency savings*1	£22,000
Total	£147,000
Restoring RBR Noise and Nuisance investment*2	-£20,000
Net saving	£127,000

Non Cashable Savings	Value
Removal of unused staff parking spaces	£10,000
Non-cashable efficiency savings *1	£27,500
Total	£37,500

Net total Cashable and Non Cashable Savings	£164,500
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* Further detail on this saving is on page 63

*1 Further detail on efficiency savings is in paragraph 11 and Appendix 11. A total of £49,500 is offered through efficiency gains.

*2 At the conclusion of the RBR of Noise and Nuisance Members agreed to re-invest in the service the £20,000 savings identified.

Option 3 (not recommended by officers, but offered for consideration by Members)

In addition to either option 1 or option 2, Members may choose to make much more radical reductions in service levels that could lower the costs of the Environmental Health and Trading Standards

service by up to £1,283,500 (see options analysis at page 65 and Appendix 1). These reductions, if taken in full, would see the cessation of all discretionary service provision, and would reduce capacity to deliver statutory regulatory services.

Reduced Service Levels	Value
Discretionary services	£491,500
Statutory services	£572,000
Project work	£220,000
Total	£1,283,500*

*Additional implementation costs will be incurred.

2. Background

2.1 Introduction

A comprehensive examination of the service has been conducted within the framework of a Royal Borough Review (RBR). The project team and contributors are listed in Appendix 2. An external adviser from the commercial sector was selected to sit on the Project Board offering independent scrutiny from outside the local authority sector. Mr Paul Gold the Managing Director of Osborne Richardson (a company partly dedicated to flexible resourcing for Environmental Health and Trading Standards) made a valuable contribution, especially in relation to outsourcing and the possibilities of expanding services into new areas.

This report outlines the key findings of the Review Team, its conclusions, and options for savings and service improvement.

The main body of the report is organised around the 'four Cs' of best value:

- Challenge
- Consultation
- Comparison
- Competition

Additional material on a number of cross-cutting themes follows the analysis of the four Cs. These themes include:

- Personnel
- Information technology
- Community safety
- Sustainability
- Diversity and equalities

A Service Improvement Plan at the end of the report summarises officers' proposals for change.

2.2 Description of service areas

Environmental Health and Trading Standards are mainly statutory regulatory services (92 per cent of expenditure) dealing with a wide range of complex public health and consumer protection issues. The Council is a 'food authority' under the provisions of the Food Safety Act 1990, with an obligation to enforce the provisions of that Act taking account of guidance issued by the Food Standards Agency. The Council is also responsible in law for the enforcement of many provisions of the Health and Safety at Work etc Act 1974

and its associated Regulations. The Council is a 'weights and measures authority' and its Trading Standards Service has an obligation to enforce a multitude of statutes relating to consumer protection. As a 'local housing authority' the Council also has a duty to inspect dwellings where 'category 1 or 2 hazards' may exist, and must take enforcement action where a category 1 hazard is found. The Environmental Protection Act 1990 and Environment Act 1995 impose complex obligations upon the Council in relation to the abatement of statutory nuisances, the remediation of contaminated land, and air quality management.

The Department has maintained a strong focus on professional excellence in discharging this extensive set of statutory obligations as shown by some high profile public protection work, including well-publicised food safety and health and safety prosecutions, some well-regarded consumer protection projects, the declaration of an 'air quality management area' covering the entire borough, and enforcement and other action to reduce noise and nuisance. From July of this year the Department will be responsible for enforcing the new legislation to ensure all enclosed and substantial enclosed public places and workplaces are smoke free. All of this comes at a cost to the Council tax payer; however this report has aimed to show the benefits of the Council's investment.

The Review has covered a diverse range of services: food safety and standards; food safety and health and safety training; health and safety; trading standards; pest control; private sector housing; environmental quality (including contaminated land and air quality); and the support and information management services backing up these professional functions. The Review has not looked at Noise and Nuisance services, as they were reviewed last year but the proposals for re-structuring have implications for this team.

Details of the costs and services provided by each Team within the Department are set out in the tables below.

Environmental Quality Unit	£ 000
Financial Details	
Total Direct Expenditure (salaries)	432
Total Indirect Expenditure (accommodation etc)	242
Total Income	18
Total Net Expenditure	656
Total Number of Staff	6
Key Products	
➤ Maintain the air quality monitoring network	
➤ Consultation responses to legislation and policy issues e.g. third runway at Heathrow Airport	
➤ Preparation of Air Quality Management Plan	
➤ Annual inspections of part B processes	
➤ Investigation and sampling to identify contaminated land	
Impact* (see end of section)	
The cost of poor air quality nationally is estimated at around £9.1 billion to £21 billion and, given the density of traffic on the local road network, the borough is likely to face a cost higher than the average. The MORI satisfaction survey for the borough showed air quality to be a high priority for residents.	

Health and Safety	£ 000
Financial Details	
Total Direct Expenditure (salaries)	447
Total Indirect Expenditure (accommodation etc)	280
Total Income	2
Total Net Expenditure	725
Total Number of Staff	9
Key Products	
➤ Inspection of high-risk premises under the Health and Safety at Work etc Act 1974	
➤ Accident investigations	
➤ Respond to Health and safety complaints	
➤ Respond to requests for advice/service on Health and Safety	
➤ Health and Safety enforcement at high profile events e.g. Chelsea Flower Show,	
➤ Asbestos notifications and enforcement	
➤ Formal action e.g. improvement notices, prohibitions of premises/equipment, simple cautions, prosecutions	
Impact *	
Improving health in the workplace is a national enforcement priority due to the high risks posed to individuals, their families, damage to business, and the costs to the economy as a whole. 560,000 workers per year experience an illness or ill-health condition caused or made worse by their work in premises in which local authorities are responsible for enforcement (this equates to 410 people per day). Over 300 accidents at workplaces in the Royal Borough were reported to the Department in 2005/06.	

Food Safety	£ 000
Financial Details	
Total Direct Expenditure (salaries)	615
Total Indirect Expenditure (accommodation etc)	288
Total Income	5
Total Net Expenditure	893
Total Number of Staff	12
Key Products	
➤ Inspection of premises under the Food Safety Act 1990	
➤ Food Poisoning investigations	
➤ Respond to food safety and food standards complaints	
➤ Respond to requests for advice from business on food safety	
➤ Food Safety enforcement at high profile events e.g. Notting Hill Carnival, Earls Court Exhibition Centre	
➤ Investigation of reported cases of infectious disease in the borough and advice and guidance to residents	
➤ Formal action e.g. improvement notices, emergency closures, food seizures, simple cautions, prosecutions.	
Impact *	
The hygiene of food businesses is a national enforcement priority because of the deaths, ill health and sickness absence caused by unhygienic food businesses, and the resultant high costs to the economy. Nationally there are 535,500 reported cases of food borne diseases each year (1,467 per day) and over 12,000 hospitalisations. The Food Team deals with around 150 infectious disease reports/food poisoning investigations each year.	

Training Service	£ 000
Financial Details	
Total Direct Expenditure (salaries)	219
Total Indirect Expenditure (accommodation etc)	103
Total Income	166
Total Net Expenditure	156
Total Number of Staff	2
Key Products	
➤ Promote and deliver food safety and workplace safety training courses to ensure that food handlers have at least a basic competence	
➤ In partnership with the PCT provide food safety and nutrition initiatives for vulnerable groups.	
➤ Improve e-Government by continuing to develop the food training website and e-learning possibilities to increase accessibility to services.	
➤ Participate in National Food safety Week.	
➤ Raise awareness and educate hospital staff about the importance of preventing cross-contamination and effective hand washing.	
➤ Extend remit of courses offered, focusing on local area needs.	

Impact *
A food hygiene and health and safety training programme is run for food handlers who work in the hospitality and retail food industry, voluntary sector, charitable organisations, education sector, and health and social care sector.

Trading Standards	£ 000
Financial Details	
Total Direct Expenditure (salaries)	303
Total Indirect Expenditure (accommodation etc)	202
Total Income	4
Total Net Expenditure	501
Total Number of Staff	7
Key Products	
➤ Inspection of high risk premises under consumer protection legislation	
➤ Deliver consumer safety projects e.g. toy safety, electrical safety, cosmetic safety	
➤ Trading Standards complaints/ requests for service on consumer protection legislation	
➤ Community safety – reduce children and young people’s experience of crime, both as victims and offenders, through projects on age restricted sales e.g. solvents, knives, tobacco	
➤ Trading Standards enforcement at high profile events e.g. Ideal Home Exhibition, Portobello Road Markets	
➤ Provide consumer advice on complex cases to residents and visitors	
➤ Provide Weights and Measures function	
➤ Formal action e.g. notices, suspension notices, seizures of unsafe goods, simple cautions, prosecutions.	
Impact *	
Fair trading is a national enforcement priority because of the huge economic damage caused by rogue trading and mis-selling, and because of their impact on individuals, particularly the vulnerable and the elderly. Nationally it is estimated that £3.2 billion is lost to scams each year with around 3.5 million people falling victim; around £30 million a year is lost to rogue doorstep sellers who specifically target older people. Locally, sale of counterfeit goods has been encountered in Portobello Market and presents the risk of organised criminals gaining a foothold.	

Private Sector Housing	£ 000
Financial Details	
Total Direct Expenditure (salaries)	693
Total Indirect Expenditure (accommodation etc)	1337
Total Income	176
Total Net Expenditure	1854
Total Number of Staff	20
Key Products	
➤ Regulate licensing scheme for houses in multiple occupation (HMOs)	
➤ Deliver housing projects e.g. House condition Survey, London Landlords Day Event	

➤ Respond to complaints/requests for service on Housing conditions
➤ Community safety – ensure safe accommodation is provided for the homeless (in partnership with Homeless Persons Unit)
➤ Contribute to the West London Housing Strategy on behalf of Kensington and Chelsea
➤ Carry out works in default where enforcement notices are not complied with by landlords
➤ Full use of grants to improve the housing stock in the private sector
➤ Formal action e.g. Improvement notices, simple cautions, prosecutions.
➤ Main agent for the Council’s affordable warmth strategy
Impact
Housing conditions impact hugely on people’s lives and well-being and housing containing hazards can harm people’s health (eg from damp, or tripping hazards), or cause death (eg from fire or asbestos). The team seeks to improve housing conditions in the private rented sector, prevent overcrowding, reduce homelessness, and prevent fires in HMOs. Priority is given to those premises used to accommodate homeless persons, asylum seekers, and backpackers. Work is undertaken to make the best use of the existing housing stock by reducing the number of empty properties.

Pest Control Service	£ 000
Financial Details	
Total Direct Expenditure (salaries)	353
Total Indirect Expenditure (accommodation etc)	213
Total Income	207
Total Net Expenditure	359
Total Number of Staff	10
Key Products	
➤ Provide a pest control service to residents	
➤ Implement block treatment on premises owned by RSLs and the TMO	
➤ Provide pest control treatment and monitoring programme at Social Services establishments, other Council premises, and TMO property	
➤ Work in partnership with Thames Water Utilities to ensure adequate sewer baiting programme is maintained in the borough	
➤ Provide a clinical waste collection service	
➤ Joint working with Waste Management on the Urban Hygiene Campaign	
Impact	
Rats are a growing problem throughout the world, and the availability of food on the streets, particularly high-protein matter (such as fast-food products), is enabling rats to increase in size and weight. Rodent and insect pests have the potential to spread disease in humans. Despite the absence of a specific statutory duty to provide a service, pest control is considered a fundamental public health issue and each year the Section provides treatment and investigation services to approximately 1,800 residents.	

Support Teams	£ 000
Financial Details	
Total Direct Expenditure (salaries)	578
Total Indirect Expenditure (accommodation etc)	914
Total Income	0
Total Net Expenditure	1492
Total Number of Staff	13
Key Products – Operation Support Unit	
➤ Maintenance of records, archives, filing, word processing and data entry service	
➤ Process Works in Default and manage debt recovery programme	
➤ Administer HMO licensing and Food Safety Act registrations	
➤ Maintain office supplies	
➤ Process Land Charge Notifications	
➤ Monitor pest control contracts on payment	
➤ Administer Housing Act Notices	
Impact	
The team provides an administrative support service to all service areas in the Department. It carries out a wide range of duties including quasi-legal support functions, grant processing, work in default procedure, and typing. It enables the Department to provide high quality services to the public through continual improvement of information and communication systems.	
Key Products – Business Systems Unit	
➤ Provide IT support to all staff in the Department	
➤ Maintain and develop Acolaid the Department's database	
➤ Maintain the Department's Document Imaging System (DIPs)	
➤ Submit statutory returns	
➤ Participate in E-Government initiative	
➤ Provide and develop performance monitoring reports	
Impact	
The team provides IT support to all staff in the Department. It develops information and management systems to support all of the service areas in the Department. It supports the implementation of new technology to improve business processes and assists the Department in achieving efficiency and economy using the Acolaid database.	

* National impact data is taken from the Rogers Review - National Enforcement Priorities for Local Authority Regulatory Services published in March 2007.

2.3 The Council's excellent status and changing times

The way in which the Council's regulatory services operate is changing significantly and change looks set to continue for the foreseeable future. The big agendas facing Environmental Health and Trading Standards are 'efficiency', 'deregulation', and 'public health'. In order to be classed as 'excellent', regulatory services are now being challenged to move beyond mere competence, and to broaden their scope beyond simply tackling infringements of

regulations. Excellent regulatory services are defined as those that support the improvement of local businesses and services, promote the vitality of local economies, and ensure the health and cohesion of local communities. If Members endorse that concept of excellence, then Environmental Health and Trading Standards are well placed locally to make a positive contribution in these areas because of their strong relationships with the business sector and local communities.

In the next decade the Department faces environmental pressures, increasing population diversity, and new patterns of migration. There is a need to keep pace with the continuing development of the information society and economy, with its major implications for retail industry and communication. There is pressure from business to cut red tape while the public displays increasing concerns about climate change, health, and product safety, and expects regulatory intervention on these matters.

2.4 The Deregulation Paradox

Regulation can be seen as a driver of improvement and innovation. Greater consumer confidence has been created over the last decade as a result of tighter enforcement. It appears that the public wants even more regulation to combat health scares such as foot and mouth disease or avian flu. But enforcement is often resented by business. Periods without any reported public health failures can stimulate lobbying for less regulation. But then a well-publicised fatal incident will occur (for example the recent deaths of two children in Corfu, when a boiler defect caused carbon monoxide poisoning), making the public anxious about any lowering of current levels of protection.

This presents a paradox in the world of regulatory services with contradictory pressures for increased enforcement on the one hand and for deregulation on the other. The work of the Better Regulation Office, the Hampton, Davidson, Macrory Reports, and the Rogers Reviews are all recent manifestations of deregulatory pressure or pressure to focus efforts more narrowly, and this Review has had to take account of these reports (a fuller description of these reports is set out at Appendix 3).

The service has to strike a careful balance in order to live with the deregulation paradox. Officers have taken the view – but Members may wish to revisit this – that the tradition of the Royal Borough has been to put a higher priority on protecting its residents than on lifting regulatory burdens on business. That tradition can be upheld, while at the same time the Council can respond to the latest deregulatory agenda by carefully deploying the fullest possible

range of regulatory instruments at its disposal, from low-key advice and support through to warnings and ultimately prosecution.

3. Purpose and Scoping Report

A clear Purpose and Scoping Report (See Appendix 4) was agreed by Cabinet. Central to this was the question of whether the services delivered the Borough Aims. The Review checked whether the Department has kept its focus on resident needs (**responding to residents**); examined services to see where there were areas for improvement and in particular how we interact with the business community (**really good services**); and considered what kind of public health legacy our services were leaving (**renewing the legacy**).

4. Challenge

4.1 Fundamental Challenge

Public health services in the UK started in the 19th century in response to the health and environmental problems caused by industrialisation and urbanisation. Improved sanitation and building standards, ever-rising standards of workplace safety, and the Clean Air Acts have solved the most important problems confronting the early pioneers of public health. However as standards of public protection have risen, so have public expectations. Furthermore, the evidence summarised in paragraph 2.2 above indicates that nationally there is still a startling amount of ill-health caused by unsafe food and workplace accidents, and the economic costs of poor air quality and rogue trading continue to be remarkable.

The Royal Borough has certain characteristics that require vigilant local public health intervention. The borough has very heavy traffic leading to poor air quality. It is well-served by a wide variety of restaurants at either end of the cost spectrum and with enormously diverse cuisine to meet the needs of residents, commuters, and tourists. It is a major commercial centre with internationally renowned retail premises and markets – a lot of people shop here increasing the likelihood of complaint and laying important responsibilities to maintain trading integrity. It is the most densely populated borough in the country, with an exceptionally high population turnover, many large Houses in Multiple Occupation (HMO), and a very high proportion of privately rented accommodation.

Local statistics		
	2005/2006	2006/2007
Reported Accidents	302	336
Food Poisoning cases	158	152
Food Safety Complaints	310	340
Health and Safety Complaints	169	209
Housing Complaints	710	783
Trading Standards Complaints	608	186
Number of Houses in Multiple Occupation	706	

In the face of these exceptional pressures, the Royal Borough's Environmental Health and Trading Standards Department has been staffed and structured to deliver interventionist public health services to a high professional standard.

The Department's principal statutory services include a comprehensive, risk-based inspection programme examining commercial premises and houses in multiple occupation; a reactive service responding to residents' and employees' complaints (for example about food poisoning, poor housing conditions, short weight, or hazards at work); and special projects aimed at preventing or reducing long-term environmental problems (for example poor air quality).

Comparisons with other local authorities show that Members' commitment to funding the service has enabled higher quality work to be undertaken in Kensington and Chelsea than elsewhere. For example, some Councils have had to abandon any effective follow-up work to their statutory food safety and health and safety inspection programme, meaning that whilst a Council's legal obligations may have been discharged, the premises may not be improved to an adequate standard.

There are many examples of Kensington and Chelsea's officers contributing to change and development beyond the borough boundaries. This has had a marked effect on the Council's reputation, the morale and commitment of staff and our ability to recruit and retain high calibre staff. Initiatives have included leading the West London Regional Sub Group through the changes to housing legislation, seconding officers into the Health and Safety Executive, and leadership in air quality management that led to the Council being short-listed for Beacon Status.

However it is becoming increasingly difficult to recruit high calibre professionals because of low investment in training in the UK and the retirement of more professionals than are being trained. This has had a particular impact on the Trading Standards and Food services. The age profile of existing staff suggests a major challenge for the future. Once the older more experienced staff begin to retire, skill shortages may worsen unless there is investment in training a new generation of professionals to take their place (see SIP action plan 24).

4.2 Challenging performance – how well do we do?

To ensure consistent and rigorous challenge on why we provide services and whether we are best placed to do so, each of the nine service areas completed a 'Challenge' exercise. Managers involved their teams in this exercise and provided a comprehensive written account which was scrutinised by a member of the Departmental Management Team from a different area of work. Appendix 5 shows an example of this challenge document; all the completed documents are available as background papers. The outcomes of this work fed into three 'away days' for managers that generated options for the SIP.

4.2.1 Performance analysis

The following table shows the general highlights in performance and identified potential improvements from the challenge exercise:-

Performance Analysis

Are we delivering really good services? Are we responding to residents?

Team	High performing area	Area for improvement
Food Safety Team	Excellent record of issuing complex Emergency Prohibition Notices (closing a food premises when they pose a risk to health) and a 100per cent track record of these Notices being ratified by the Courts.	Offer a better first response on complaints and enquiries to residents/businesses. Keep customers updated of the actions taken by the Council.
Health and Safety Team	Excellent depth and breadth of technical and legal knowledge not only about enforcement but also about business needs and how the rest of the Council's internal partners link up.	More efficient working practices. For example officers need more comprehensive warrants/authorisations which will enable them to deal better with the full range of issues that they come across in their work.
Trading Standards Team	Detailed technical knowledge and practical experience of consumer related issues and consumer protection legislation. A capacity and appetite for dealing with tough criminals.	Weak education and information services which need to be rebuilt in the light of new public health responsibilities. Recruitment difficulties have hindered effective operational and project work, and reduced capacity for proactive work including market place monitoring and intelligence gathering.
Training Service	Largest London provider of food business training with feedback from candidates and employers that demonstrates that the service delivers what users require. In 2006-2007 over 4000 organisations were listed on the training database.	Extend remit of courses offered and focus as much as possible on the local area. The non-food businesses in the Royal Borough have not been targeted yet as potential customers for health and safety courses. Customers are increasingly asking for weekend and evening courses. Re-think training offered so it better promotes the economic vitality of the borough and the health of residents.
Pest Control	Effective, popular and well used service. The public trust the Council's brand and reputation and moreover, the service is competitive and offers good value for money. Residents and others are aware of the high standards of service delivery and professionalism that the Council is committed to. The team is committed to residents and will always 'go the extra mile' to ensure that the job is done well.	The administration systems that support pest control need to be reviewed to ensure that the Team operates to its full potential. The 'remoteness' of Environmental Healthline can cause problems. The Officers find Acolaid the new IT system to be challenging and a review of the team's procedures and systems and the integration with Acolaid needs to take place.

Performance Analysis

Are we delivering really good services? Are we responding to residents?

Team	High performing area	Area for improvement
Housing Team	<p>Excellent complaint/enquiry service, with a quick professional response. Provides wide ranging solutions from sign-posting to other organisations better placed to assist to full blown statutory action followed by execution of work.</p> <p>Good knowledge of the area (and sub-region) and understanding of local policies. Officers communicate well with all sections of the community i.e. residents, tenants, landlords, managing agents etc</p>	<p>The team's priorities must be re-examined in light of the new Housing Act 2004. The new Act has also had an impact in other service delivery areas in the Council, such as housing allocations. Allocations policy is currently under review. There is some expectation placed on the team to deal with non-priority areas which needs to be examined and managed.</p>
Business Support Unit	<p>Excellent systems support to operational teams. Well qualified staff who understand both the business processes involved and the Department's reliance on technology. Staff also lead on development of a system that now underpins Planning, Building Control as well as EH and TS.</p>	<p>Better planning to improve and develop IT systems. Reactive work often prevents a clear focus on developing and improving the functionality provided by the Department's fundamental data recording system, Acolaid.</p> <p>Re-location of their reporting line to give them a clear mandate to drive service improvement.</p>
Operational Support Unit	<p>Professional and motivated administrative support service including para-legal work such as service of statutory notices, which enables higher paid professional, technical and managerial staff to focus their time on tasks appropriate to their skills. The team are well qualified, experienced, and all have a general IT/systems knowledge as well as some general legal expertise. An important asset is that all members of the team have a variety of skills but can cover other duties in times of absences.</p>	<p>Closer proximity to the operational teams to promote better integration, to assist with development opportunities for team members, and increase their expertise and job satisfaction.</p> <p>Re-location of their reporting line to give them a clear mandate to drive service improvement.</p>

Performance Analysis		
Are we delivering really good services? Are we responding to residents?		
Team	High performing area	Area for improvement
Environmental Quality Unit	<p>Excellent research and policy development skills, producing high quality scientific reports to DEFRA and the GLA.</p> <p>Plays an important role in responding to consultations that may impact on our residents; responding directly to central Government and also assisting London Councils with their responses to Government consultations.</p> <p>The team provides briefing material for Cabinet Members on a number of strategic pollution issues.</p>	<p>Improve communications with external local groups and schools. A more proactive approach rather than just dealing with enquiries received is needed.</p>

4.2.2 Performance for Inspections

The inspection results for food safety and food standards improved year on year in the three years to April 2006. This is illustrated by the increase in the percentage of businesses getting competence scores of 'satisfactory' or 'excellent' from only 44 per cent of businesses to over 80 per cent.

CIPFA returns show that in 2005/06 the Council's Health and Safety Team conducted more inspections of premises than were done in any other London borough that year; the Housing Team conducted the fourth highest number of inspections in the same year; the Food Team conducted the eighth highest number. The performance of the Food Safety and Health and Safety teams can also be measured by the high level of value added when advisory letters are issued following an inspection. CIPFA returns indicate that in the year 2005/06 letters requiring improvements were sent to 61 per cent of all food businesses in the borough following an inspection, the third highest percentage level in London. The Health and Safety team was second-placed in London on the same measure (and the highest performing authority's figures are understood to be statistically inaccurate). These teams have already amalgamated some inspections, making their services more efficient, reducing the burden of inspection on businesses, and fulfilling some Hampton recommendations early.

Another strength for the Department is the Training Service that provides training to those employed in businesses and other organisations with food and health and safety courses. The course

attendees are asked to comment on the training through feedback forms. The results showed that many of the ratings were above 90 per cent, for example the standard of teaching was rated by 95 per cent of candidates as good or very good.

The performance of the Trading Standards team is more difficult to analyse because records before and after the introduction of Acolaid in 2005 are not strictly comparable, and also because of an externally imposed change altering the previous regime for risk assessed inspections of premises, placing a greater focus on topic based inspections. Trading Standards do continue to meet their targets for inspecting high risk premises on time. The performance management system has not adequately kept up with these changes, and further work will have to be done on this as we evaluate whether or not to recommend joining the Trading Standards Consortium operated by Brent and Harrow. (see SIP action plan 19).

The implementation of the Housing Act 2004 has posed similar difficulties around performance analysis for the Housing team. For example this has completely changed the emphasis and method of inspections. The full impact on inspections is still not known as it is reliant on the licensing of HMOs. Only once inspections following issuing of licences commence can performance measures on inspections be implemented (see SIP action plan 12).

The EQU carry out part B processes in the borough and for 2006/2007 are fully up to date with the requirements (a total of 10 inspections). In 2007/2008 the numbers will have increased to 38 as dry cleaners have come under local authority control.

4.2.3 Performance for Enforcement

Enforcement by the teams is very consistent in terms of the number of prosecutions, formal cautions and notices served over three years (see Appendix 6). The only apparent exception is the number of notices served by the Housing team that has seen a decline from 426 in 2003/04 to 335 in 2005/06. However this is due to the change in housing legislation with the introduction of the Housing Act 2004, and where several notices were previously served to remedy defects only one notice is now generally required.

4.2.4 Performance for Complaints and Enquiries

The key indicator used by the Department for responding to service requests is the time taken for the investigating officer to get back in touch with the resident (first response indicator). The performance

against this measure was high for all teams (Food Safety, Health and Safety, Trading Standards and Housing). The target for non-urgent enquiries was generally 3 days, but in fact between 77 and 92 per cent of complainants received a first response within one day. It is proposed therefore to set a more stretching target of responding to all complaints within one day. (see SIP action plan 15)

There are as yet no performance measures beyond monitoring the initial response, and in particular no measure of how well complainants are kept informed, a major issue revealed in the consultation exercise (see consultation page 47-48). More problematically, the monitoring around achieving case resolution is not consistent. This will be rectified using a number of techniques, including offering the customer the opportunity to use web based complaint look-up facilities and the implementation of automated (but thoughtfully drafted) letters or emails at key stages informing residents of progress. Both of these can be seen in more detail in the SIP action plan 16.

Pest Control's performance was measured by analysing the numbers of treatments in response to complaints - the fewer treatments per complaint the more effective the service was likely to have been. Treatments represent a large proportion of the total service requests that the Department receives at an average over the last three years of 5,300 treatments per year. The effectiveness of the treatments is also high. Over a three year period to March 2006 the level of return treatments (defined as a recurrence within six months of the original treatment) averaged less than 3 per cent. The good performance of Pest Control was reflected in the findings of the telephone survey of service users (see consultation page 47).

4.2.5 Performance Summary

The overall performance of the Department is consistently good when compared to other boroughs and when set against our own performance indicators. Consultation showed that 97 per cent of businesses thought that the way inspections were carried out was good or very good, and 97 per cent thought the professionalism of the officer was good or very good.

The performance of the OSU and BSU who provide a support function to all teams is very good and their work is highly valued by the operational teams. (Reference - Team Challenge Reports) The Review has identified that the skills of these staff can be used better

by the Department and the SIP (action plan 3 and 4) presents plans to extend their range of work.

Experience has shown that non-statutory interventions can improve outcomes, for example revisits to premises drive up 'confidence in management' scores for food and health and safety inspections. Some other authorities do not do this (see page 50 and the CIPFA statistics), but officers have taken the view that going the extra mile is what separates an excellent service from a good one.

Planned actions to improve performance include:

- Improving links between performance and the borough aims by offering a better 'customer experience'.
- Improving capacity to deal with new policy and procedures, (a deficiency here was found recently in both Trading Standards and Housing where greater capacity was needed to deal with a new inspection scheme and new legislation).
- Improving performance targets, making them tougher and smarter, ensuring the Department continues to be rated in the top 25 per cent of service providers.
- Implementing a comprehensive performance monitoring system for productivity and quality checks that will measure whether targets are achieved or met and identify under-performing areas.

4.3 Challenging traditional ways of working – flexible working

Before this Review the Department had already committed itself to a programme of work (the 'Modernisation' Programme) examining how the service could operate more efficiently, more effectively and more economically. The findings of this programme challenged conventional approaches to our work, and were fed into this Review. Four change management issues were identified, and the SIP includes continuing work on each:

- Accommodation – We have a number of staff who have already adopted non-conventional working patterns that have reduced reliance on conventional office space. This has a positive impact on unit costs; further benefits will be realised when our accommodation is reduced and refurbished later this year and more staff change their working patterns.
- Support – Internal systems and procedures have been streamlined wherever possible. We can improve efficiency by ensuring that people do the jobs they are best trained to do. We are piloting several IT applications (e.g. digital pen technology) to see whether this can give us efficiency gains. The SIP elaborates on this area.

- Working Models – We are testing a range of flexible working patterns to see what benefits they can offer both employer and employee. We have many staff that work partly from home. We have staff who are working remotely and who come into the office less and less. We have staff who are hot-desking and desk-sharing. It appears that the wider the variety of flexible working options, the more gains can be made in terms of efficiency and accommodation costs.
- Communication – In the face of rapidly changing and competing priorities we must manage change well and effective communication with residents, service users and with staff is critical if the Department is to be successful.

4.4 Challenging Organisational Arrangements - is the Department structured to meet future needs?

4.4.1 Current configuration

Changes in the structure of the Department would help it meet the demands of the future. The Department has been largely focused on a traditional public protection role and has delivered well, but the recent CPA inspection and the development of other agendas shows that a more sophisticated approach is now required. There is a need to offer leadership on the emerging public health strategy. There is also a need to drive modernisation and continuous improvement across the Department to meet changing expectations and to capitalise on the benefits that a fully mobile workforce can offer.

4.4.2 Future configuration

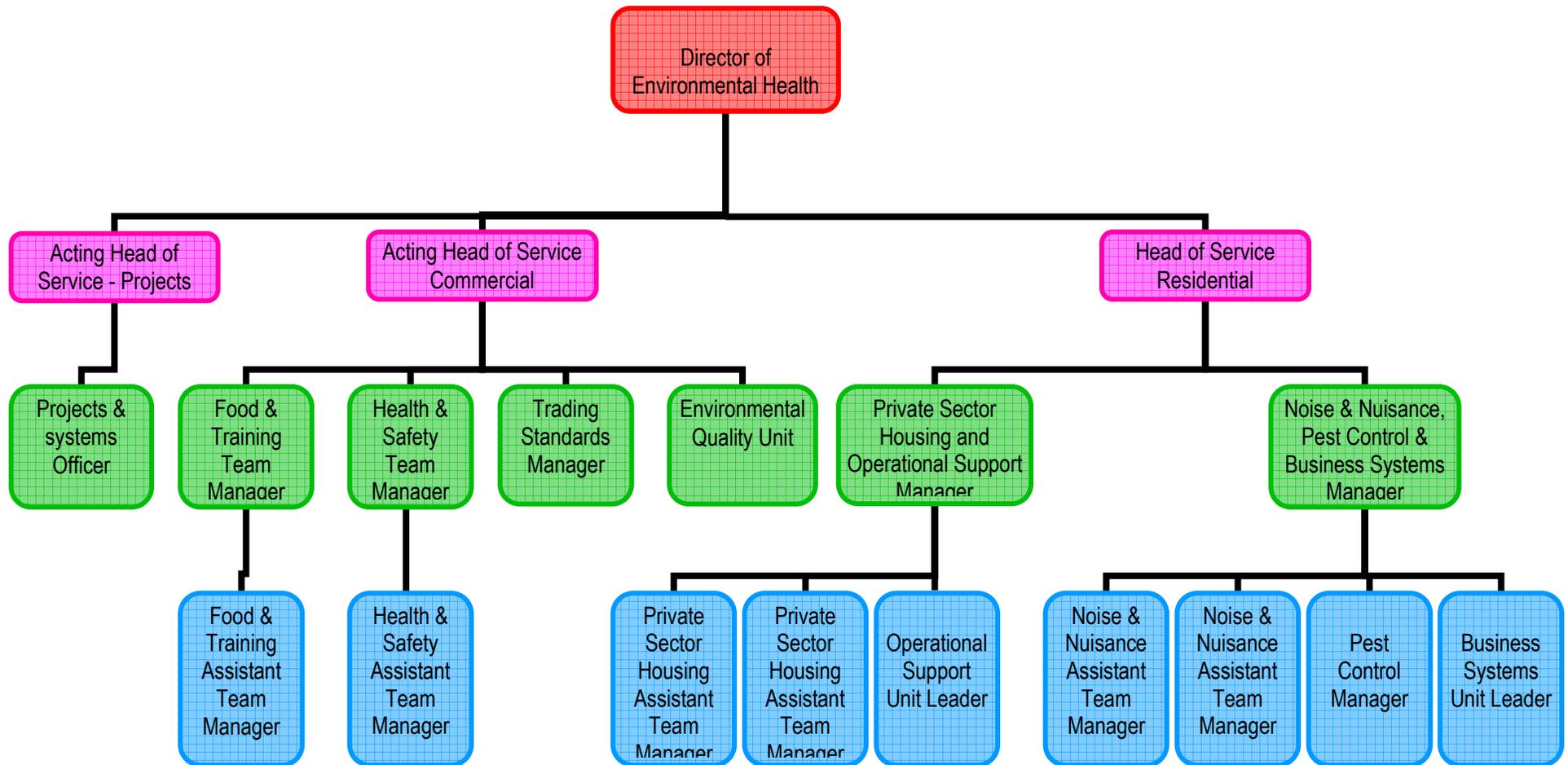
A reconfiguration of our existing structure can offer capacity within the Department to deal with the public health and service improvement agendas, while maintaining the traditional strength of the professional services. This can be achieved by taking advantage of some vacancies and by de-layering the management of the Department.

The detail of these proposals can be found in the options analysis (option 1). In short this option recommends merging three managerial layers into two, re-defining the roles of Head of Service, Team Manager and Assistant Team Manager to orientate them more clearly to operational and strategic duties. The effect would be to reduce managerial posts by two and to facilitate this there would be some centralisation of administration, and streamlining of systems and procedures to free managers to lead their services better. This would require modest investment in Support Services. A new post would be established to head the public health and service improvement work in a grouping that joined together the Business

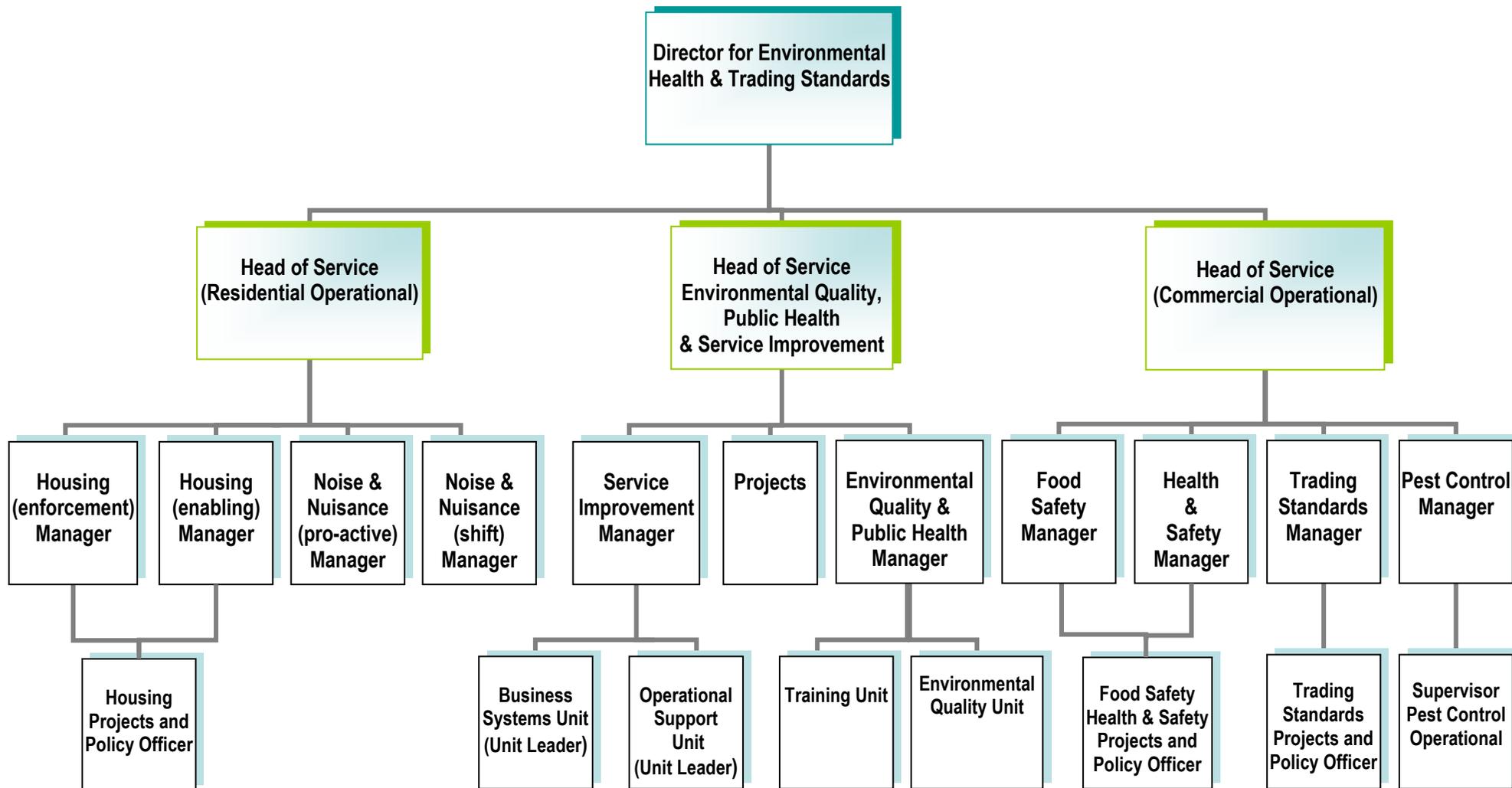
Systems Unit and Operational Support Unit. This new grouping will also bring together the training service and the Environmental Quality Unit, whose work is already about policy and public health.

Consideration has been given to further reduction in the numbers of management posts but the conclusion has been that doing this in advance of an ambitious modernisation programme could affect the ability to manage change effectively and affect delivery on other efficiency commitments offered in this review. However there will be scope to re-examine this in the future.

Current Departmental Structure



Proposed Departmental Structure



4.4.3 Working within the HHASC business group

Before the recent reorganisation of the Business Groups, operational relationships with Housing (through the private sector housing team within Environmental Health) and Adult Social Care (through mutual clients) were already well developed. One aim of the reorganisation was to build on that existing base and create opportunities for better integrated leadership of the emerging public health agenda, and for improved co-ordination of the Council's relationships with the PCT.

4.4.4 Working with the PCT - Renewing a public health legacy

There is a growing interest in public health and the promotion of well-being as the cost implications of ill health and increased longevity become clearer and a better understanding of the determinants of health is attained. Some of this interest has been expressed in the recent Local Government White Paper, and the Department of Health acknowledged its importance with earmarked 'Choosing Health' funds for Primary Care Trusts in 2006/07.

While residents of Kensington and Chelsea already enjoy high average high life expectancy, demands upon social care and health services are likely to grow unless the public health strategy is successful in promoting healthy lifestyles that assist residents to remain well for longer. And behind the high average life expectancy across the borough lie startling variations: there is a difference of up to 12 years in estimated life expectancy between the most and least deprived areas in Kensington and Chelsea.

Traditional public health work focused on the provision of clean water, slum clearance, and the prevention of disease. There is now much lower mortality and morbidity arising from very poor environmental and housing conditions – a legacy of the early public health pioneers that is taken for granted. However a new agenda for public health has emerged with the publication of the White Paper 'Our Health, Our Care, Our Say'. This White Paper seeks a renewal of the public health legacy in the 21st century. It proposes redefining the public health mission to include, amongst other things, making it easier for people to make healthy and informed lifestyle choices about smoking, physical activity, and the food they eat. Success has been defined in terms of residents' self-assessment of their own improving health, and in terms of matching their perceptions with a measured increase in average life expectancy, a reduction in premature mortality, and a narrowing of local variations in life expectancy.

The PCT's Director of Public Health and the Director for Environmental Health and Trading Standards have worked together on the preparation of a Public Health Strategy. This has helped improve relationships between the two bodies at a difficult time. If the new strategy, which embodies key components of both our Community Strategy and the current Local Area Agreement, is to deliver the required results, it will need both leadership and support from within the Council and the Department.

The Environmental Health and Trading Standards Department has a central role to play in renewing the public health legacy, and all teams have new opportunities to create a more holistic, sustainable and cost effective approach to delivering environmental health and trading standards services. This can be achieved through the strengthening of existing, and the development of new, links and partnerships with other internal stakeholders and external organisations including the PCT, the Police, and the Fire Brigade to improve health. Examples of work ahead include: the implementation of the Government's smoke free legislation, leading on strategies to reduce the harm caused by smoking and alcohol abuse, and continuing to prevent the sale of alcohol, solvents, cigarettes and knives to children.

The Department's public protection role must be maintained so that the incidence of food poisoning and work related illness for residents and those who work within the borough is as low as can be achieved. Looking beyond that traditional role, private sector employers, particularly the larger ones, are well aware of the damaging impact of sickness absence on their operations and Council officers are well-placed to help them promote best practice and innovation relating to healthy lifestyles in order to secure health and economic benefits. Consultation shows that the Department's officers are a trusted source of guidance and advice for business with 90 per cent perceiving the officers' explanations to be good or very good (see page 47 consultation).

Finally the re-definition of managerial roles provides the opportunity to allocate specific responsibilities to specific managers for making a contribution to the Council's big agendas (children, community safety, sustainability etc).

4.4.5 Is the Department meeting new demands on private sector housing services?

The Housing Act 2004 brought major change for the regulation of private sector housing. And the challenges demand an effective, dedicated and professional team.

The Royal Borough has always maintained a strong tradition of enforcement in this sector, particularly in Houses in Multiple Occupation (HMOs). The borough's housing stock contains some of the largest and oldest residential properties and it is not uncommon for 30 or more tenants to be accommodated in multi-occupied dwellings.

Hitherto, enforcement involved the improvement to prescribed standards through service of a variety of statutory notices. The 2004 Act has replaced this with a hazard rating system which assesses the degree of risk arising from hazards ranging from the physical condition (disrepair, dampness, etc) to factors such as excess cold, risk of falls and home security (likelihood of entry by intruders) and new enforcement notices.

The new Act also introduced a mandatory licensing regime for certain types of HMO with a responsibility to ensure owners are 'fit and proper persons' and that their premises comply with licensing conditions.

This is a new type of enforcement with additional demands for the Council. There are some 450 licensable premises in the Royal Borough and the initial demand over the first five years of the scheme (licences will generally run for five years) would require two posts to be self-financing through licensing fees. Applications are now being received and officers believe that HMO Licensing will drive up standards in this sector.

However, the focus of the Private Sector Housing team is not exclusively on enforcement within HMOs. Officers continue to work with colleagues in Housing and Strategic Development on a range of enabling and commissioning initiatives to improve conditions for tenants, to facilitate those with disabilities to continue to live in their own homes, and to seek opportunities to engage with landlords to provide more and better accommodation in the private sector.

The other major change that comes with the new legislation relates to overcrowding. With over 60,000 households in temporary accommodation across London and a new way of assessing overcrowding that is likely to increase the number of households that are considered to be overcrowded, the challenge for the Private Sector has grown significantly. A 'Crowding' Enforcement Policy is in preparation to complement the Council's Housing Allocations Policy.

The recent Private Sector Stock Condition Survey and evaluation of the changing pattern of conditions within the sector will inform a revised Private Sector Renewal Strategy due to be produced later this year.

4.5 The Future for the Department

With value for money and cost to the Council Tax payer in mind, staff within the Department have been consulted on a new vision for a 21st century Environmental Health and Trading Standards Department that would strive to:-

- Be determined about our contribution to health, the environment, community safety and new agendas for the young and the old.
- Be about what customers need rather than what we think is good for them.
- Be efficient but also caring.
- Be open and accessible, technologically competent and equipped to deliver.
- Be continuously innovating to improve.
- Ensure that our staff are skilled and motivated to make a difference to people's lives.
- Provide job satisfaction and a sensible work/life balance so people want to come here to work and choose to stay.

The following cross-cutting themes would guide Departmental planning:-

- Improving public health and well being
- Improving community safety
- Improving choice, well-being, and health of older people
- The 'Every Child Matters' agenda
- Attaining sustainability
- Continuous improvement and service efficiency
- Cost effectiveness and value for money for the Council Tax payer
- Improving customer care and the customer experience
- Greater flexibility
- Strong leadership throughout the Department
- Innovation
- Successful change management
- Quality assurance

Each of these themes would be assigned to senior managers within the Department, and a central role of the new Head of Environmental Quality, Public Health, and Service Improvement

would be to ensure the Department is clear about its contribution to these themes and can show measurable change as a result.

There are alternatives to this vision, notably the much-reduced service offer described in savings option 3 (see page 65). However officers recommend this way forward and Members are invited to support it.

5. Challenging Costs and Identifying Savings

5.1 Background

The financial challenge of the Royal Borough Review is to identify savings totalling at least 2 per cent of controllable budgets and to determine whether current services offer value for money. The Review has a target to achieve £77,000 cost savings. In addition, £20,000 must be found to fund the reinvestment in services required by Members following the Noise and Nuisance Royal Borough Review last year.

However, options for savings have to be considered in the context of the achievement of real reductions in the Environmental Health budget over the last 6 years, largely made as part of the Imperatives and Opportunities process.

5.2 Overall Budget and Spend

The overall gross budget for Environmental Health Services in 2006/07 (excluding Noise and Nuisance) is £7,890,000. This is a full budget and includes recharges for central support services. Of this £3,854,000 is deemed to be controllable (a breakdown is provided in Appendix 7).

The latest projections for 2006/07 show a year end underspend of only £4,000. In 2005/06 there was an underspend of £98,000 on the controllable budgets which was mainly due to re-alignment of the Licensing section into TELS and a small underspend in private sector Housing. These underspends rely upon the 'acting-up' arrangements (all of which cost less than the original posts covered) that were established when the Director led the TELS business group. They have persisted because of the need to maintain maximum flexibility whilst this Review is considered.

In order to ascertain ways of achieving the financial challenge an analysis of expenditure on Environmental Health services over the last 3 years was undertaken. The analysis compared expenditure to budget, looked for trends in expenditure and considered possible

options for savings. The results of the analysis are set out in a background document.

5.3 External funding

The service has made considerable use of external funding, for example Food Standards Agency money for 'Safer Food Better Business' and imported food projects. The Department continues to bid for additional funds where available but grants tend to be available for only specific areas of work, are generally one-off and the opportunities to fund mainstream work from additional grants are very rare.

5.4 Options for Savings

Having reviewed expenditure over the last three years, it is apparent that the scope for savings within the non-salary controllable budgets is very limited.

The salaries budget in 2006/07 is £3,236,000 which represents by far the biggest part of the gross controllable budget (84 per cent). In 2005/06 the salaries budget was underspent by £20,000 and in the current year an underspend of £50,000 is projected. This is a result of holding vacancies, a variety of acting-up arrangements, and careful budget management. Maintaining this level of underspend in the future will not be possible without changes to the service or a restructuring. A reduction in the current use of agency staff would achieve some minimal savings.

The suggested restructuring of the Department would offer savings of £30,000 in a full year. However, the process to achieve this restructuring will need to be phased to avoid compulsory redundancies and may take some time. In 2007/08 additional costs may arise on a temporary basis until the full restructuring can be achieved.

One potential saving outside the salaries budget is the rationalisation of IT licences associated with the Department's application software – this could yield £20,000 of cashable savings.

A planned reduction in the number of car parking spaces allocated to staff will result in annual savings of £10,000. However, these car parking spaces are procured by Corporate Services and costs are recharged to Environmental Health and these savings arise against the non-controllable budgets within Environmental Health. However, provided the spaces can be used appropriately by other services within the Council, or Corporate Services can incur a lower

charge for the reduced number of spaces, then this option gives real benefits to the Council.

5.5 Opportunities for raising additional income from charges

Income generation has been considered as part of the 'Imperatives and Opportunities process' on many occasions. Possible options have been analysed and assessed in terms of legality and practicality. During 2007/08, it is planned to calculate the actual costs of providing chargeable services and compare these to the charges currently raised and those raised by other authorities.

As part of the challenge process, managers were again asked to consider income generation and there is potential to generate additional income within the Training Service and Pest Control. In each case, consideration must be given to whether any increases in charges would lead to a reduced demand for services.

5.5.1 Training Service

The Food and Training section's training programme is a major operation in terms of the throughput of its 4,000 plus candidates and the increasing portfolio of qualifications being offered. Gross income is substantial at £193,000 in 2005-2006. The existing programme is highly regarded across London and dominates the London local authority training scene. (In 2003-2004 CIPFA highlighted the fact that the service's income amounted to 74 per cent of the total food hygiene training income generated by all London authorities!)

Once the marginal costs of providing the training were deducted (for accommodation, training consultants, examinations etc) a contribution of around £10,000 was made last year towards the salary costs of the training section. It has been accepted that the section does not break even because of its public health objective to ensure access to training for socially excluded groups who may not be in a position to pay market rates. However, the service aims towards being cost neutral.

Continued expansion of the training programme to meet public health objectives requires a dedicated training space and more administrative support. As part of the 2007/08 Imperatives and Opportunities process, growth funding of £30,000 was made available to the service for this purpose and it is expected that from year 3 these additional costs will be fully met from additional income.

There are possibilities for generating further income from innovative ideas but there are risks which need careful assessment and we would need to work in commercial partnership with external agencies. These possibilities are explored further in the Service Improvement Plan.

5.5.2 **Pest Control services**

There is no statutory obligation on the part of the Council to offer a pest control service and there are private contractors available to provide treatment in both domestic and commercial premises. The Council could elect to cease providing a service and refer residents and businesses to the private sector. This would result in savings of approximately £145,000.

While domestic rat treatments are free, a charge is now made for the treatment of mouse and insect infestation (other than for those on benefits) in line with the majority of other local authorities (see Appendix 1 for explanation). Projected income for 2006/07 is £36,000. This is lower than the budgeted income, as the introduction of charges several years ago saw a sharper than expected fall in demand and more clients than expected are benefit claimants.

Besides the domestic treatments outlined above, Pest Control contracts with other Council Departments (Adult Social Care-Residential Homes) and housing providers (the TMO and several registered social landlords). Projected income from these contracts in 2006/07 is in the region of £130,000. There is undoubtedly potential for greater income generation from contracts with other public sector bodies.

The viability of plans for additional income will be explored through a **trading account** which would identify income and costs on each of three 'product' lines:

- Public health work without charge e.g. rats in the street
- Paid-for domestic services.
- Pest Control contracts.

As part of this process, the unit costs of the various services are being identified and compared to those of private contractors and other local authorities to evaluate the competitiveness of the service. The potential short fall in demand through raised charges would need to be considered. The overall objective of the trading account is to progress towards a cost neutral service.

Best value, CPA, and value for money

5.6 BVPI Framework

There are currently only two BVPIs (166a and 166b) that apply to the whole service, measuring performance against a checklist of best practice for Environmental Health and Trading Standards respectively. They provide an indication of how the service is performing and are included in the CPA framework. BVPIs (216a and 216b) relate specifically to contaminated land and (217) relates to pollution control improvements. This picture might change following the recent publication of the Rogers report.

The Service would benefit from the establishment of a limited number of additional local performance measures that are reasonably easy to collate and interpret. Indicators that measured the effectiveness of discretionary activity, for example, food safety training, would be particularly desirable.

The lack of an adequate national performance measurement framework makes it very difficult to judge the relative performance of the Department, but on the limited data available it appears that current performance is very good.

The Department offers extensive discretionary services that go beyond those offered by other local authorities in areas such as food safety training. CIPFA SIS data suggest that the number of inspection and enforcement actions undertaken by the Council is high by comparison with almost all other London boroughs.

It is possible, though, that a high level of inspection and enforcement could indicate weaknesses elsewhere, for example in advice, training and information provision. Performance measurement and analysis must ensure that the context in which the service operates is properly understood and that future changes to performance and data are interpreted consistently. This understanding may become very important if the Government remains intent on reducing regulation, and putting an increased emphasis on the provision of advice to business.

5.7 CPA Service Assessment

The Environmental Health Service is included in the CPA environment block. The service block is a weighted score based upon performance against a set of performance indicators and the outcome of previous inspections. 82 per cent of the Council's score is based on performance indicators, and 18 per cent on the Waste Management Inspection. Performance against each indicator is assessed as above, between or below two levels, known as thresholds. Performance below the lower threshold can have a very

damaging impact on the service block score and as a result, on the overall score the Council achieves. Conversely, performance above the upper threshold can be highly beneficial.

Six of the indicators relate to the Environmental Health Service. Of these, E27/BVPI 166a is between the thresholds. The others are above the upper threshold. Four of the indicators require 100 per cent compliance to achieve the upper threshold. Although this has not presented a problem for the service, it removes all scope for error and demands close performance monitoring.

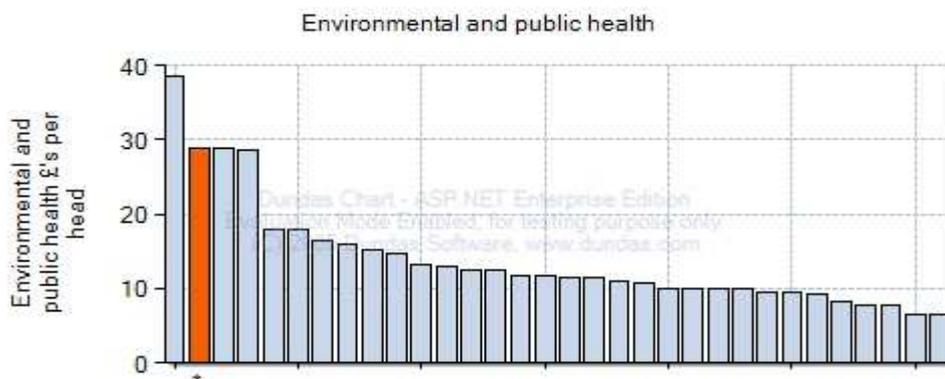
5.8 CPA Direction of Travel Assessment

The CPA Direction of Travel Assessment measures the rate at which the Council is improving its service. One indicator relating to the Environmental Health Service, BVPI 166a, is included in the analysis. This indicator recently fell significantly (the only indicator to do so for the Council) although this was because of a new interpretation rather than a drop in performance. Although not vital to the overall CPA rating of the Council, an 'improving strongly' Direction of Travel Assessment is highly desirable, and so close attention must be paid to indicator 166a to ensure it is improving.

5.9 The Value for Money Assessment

The Value for Money assessment forms part of CPA Use of Resources block, and is judged by the auditor in response to the Audit Commission's Value for Money Profile of the Council, and the Value for Money Self Assessment made by the Council. The Assessment led to criticism of the Environmental Health Service because the external auditors judged that the cost of the service was excessive given its level of performance. The auditors have in part based their judgement on the Council's high spending per head on environmental and public health compared to other London boroughs, as shown in figure 1 below.

Figure 1: Environmental Health Spending Per Head of Population (London)



Source: Audit Commission VFM Profile (latest available version July 2006, which use 2005/06 budgeted spending)

However, this data may be misleading regarding the value for money delivered by the Environmental Health Service itself. 'Spend per head' of resident population is not a useful way of thinking about the value for money of services delivered in an area with a high number of commuters and visitors to its restaurants, museums, or pubs and clubs. Like Westminster and Camden, Kensington and Chelsea has regional and national public protection functions that make comparisons with other boroughs problematic.

Data relating to the Private Sector Housing Team indicates that spending is higher than the norm. The data show a clear distinction between the spending by inner London boroughs on the service compared to outer London boroughs. The Council's net spend per private sector dwelling is 137 per cent of the inner London average, which is not altogether surprising given the exceptional percentage of households that rent property privately, and the relatively large number of households in shared accommodation. The 2001 Census found that the borough had the second highest percentage of households in London without a bath or shower, and the fourth highest level of overcrowding. However the difference in spending is high enough to justify continued scrutiny to ensure that it is fully justified by real differences in local conditions.

In order to demonstrate value for money within the context of the CPA Use of Resources framework, it will be necessary for the Service to demonstrate its efficiency and therefore to assess its quality of service relative to its costs, compared to other London boroughs. The objective of the assessment must be to confirm that existing policy is correct – or to change it - and that the service is efficient. The assessment will consider the frequency of inspections,

the number of premises inspected, the level of advice and training provided, and whether the risk-based approach can be further refined.

CIPFA SIS data is not audited, and it shows significant differences in the treatment of costs and recharges. Nevertheless it is the best available tool for measuring performance and costs against other London boroughs. The data show that the Council is both taking a high level of enforcement action and providing high levels of training and advice. But it is important to demonstrate that the training and advice is having an effect, and that the high level of enforcement activity is warranted and secures high standards.

The reported cost structure of the Environmental Health Service may benefit from closer examination. Support service costs are reported to be the second highest in London, as are capital costs. These costs will be examined to ensure that any allocated costs are equitable and opportunities to reduce direct costs within the control of the service, particularly back-office costs, will be taken.

5.11 Making Savings and Efficiency Gains

It is difficult for the Environmental Health Service to make year-on-year savings without cutting front line services, let alone cashable efficiency gains. Reducing the level of discretionary services such as food safety training, which are provided as a matter of policy, would result in a budget saving, but would not result in an efficiency gain because service levels would be reduced. Therefore, the focus must be on making the Environmental Health Service as efficient as possible. Efficiency savings are available in two areas:

- **Management costs:** There is scope to 'de-layer' management
- **Overhead and back office costs:** There is scope to introduce more efficient back office processes, such as the elimination of paper forms, better information systems, more use of mobile working and streamlining of tasks to enable savings and gains to be made. This will improve productivity by freeing up officer time to undertake more inspection and enforcement work.

6. Consultation

6.1 Background

The Department engages with a wide range of individuals and groups in the course of its day-to-day work. The consultation exercises done as part of this Review built on the existing relationships and contacts that the Department already has. But the aim was to move beyond anecdote and gather hard evidence about customers' views of the Department.

The Residents' Panel has been employed three times in the past to gauge both views and knowledge of the services, but other than this there has been no comprehensive survey that has dealt with all services delivered. There has been limited consultation with businesses and landlords in the past, but their views of the Department were largely unknown.

A wide range of consultation methods were used during the Review, and a specialist survey company (SMSR) was engaged to carry out a telephone survey of service users and a separate survey of businesses and landlords. The other key element of the telephone surveys was to gather profiling data for the Equalities Impact Assessment.

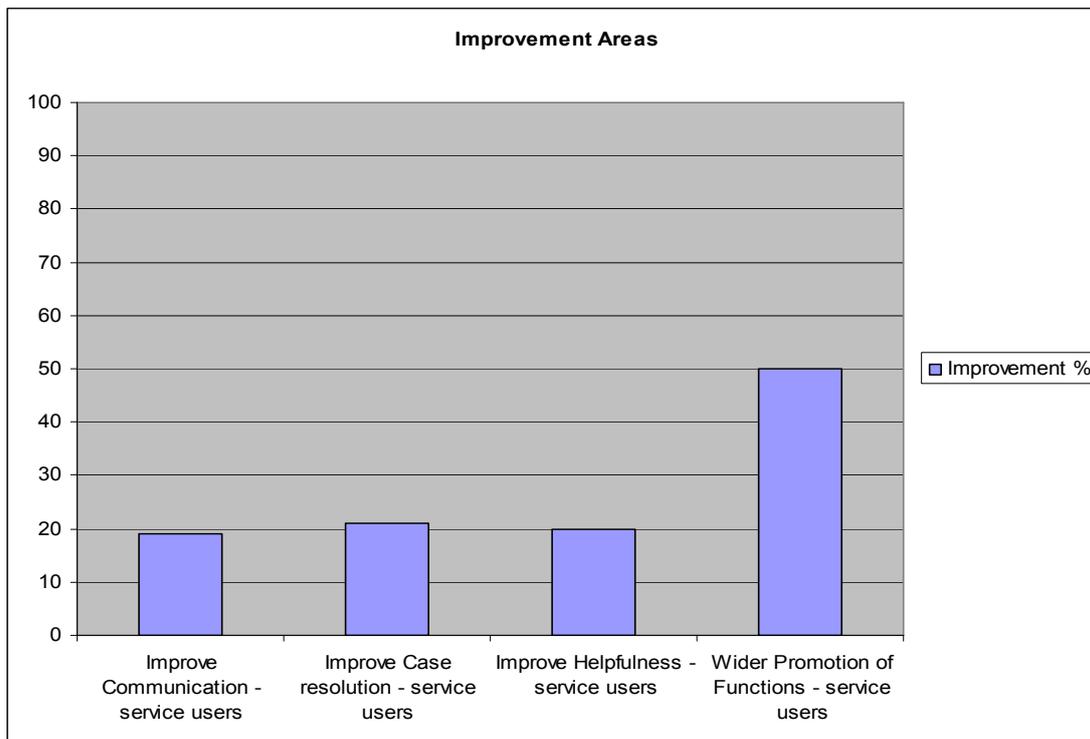
The views of the Residents' Panel were sought in September 2006 to gauge the knowledge, perception and the satisfaction with services (if used). One of the few sources of consultation data that existed were the results from earlier Residents' Panels conducted in 2002 and 2005. These covered knowledge of the service, so questions for the latest panel were focused on this area to gauge any change over time.

Internal staff consultation was managed in confidence by the PPU, and gauged officers' opinions on issues including team and Departmental structure, Departmental objectives, communication and the Public Health Agenda.

Other groups consulted included Members and a range of internal and external partners. Officers had a prior perception that Members highly regarded and valued the service. The survey was designed to test the truth of this, and to identify Members' priorities.

The Resident Reviewers undertook a 'mystery shopping' on call handling across the Council and the findings of this have been added to the analysis.

The two graphs below highlight areas of high satisfaction and areas for improvement and provides evidence of what we have recognised to date, which is that the service is professional, hard-working, experienced and committed.



6.2 Key Findings of the Business/Landlords Survey

The approval ratings were surprisingly high bearing in mind the Department's enforcement function. The overall perception of the respondents was extremely positive with a very high percentage of businesses rating the visit by an inspector as good (93 per cent) and that the officers were professional (97 per cent). Many of the approval ratings were 90 per cent or higher (see Appendix 8), despite the fact that 47 per cent of respondents had had to make improvements as a result of the officer's intervention.

The approval rating was also mirrored when businesses were asked to give a score to the quality of the service that they had received (a mean score of 85 per cent) against the level that they had expected to receive (a mean score of 83 per cent). The lack of disparity between these two scores reinforces the positive opinion that the respondents had of the service.

6.3 Key Findings of Service Users - Telephone Survey

Satisfaction with the way the staff handled their initial inquiry was high with 81 per cent of respondents being satisfied or very satisfied. This level of satisfaction was also shown by the Resident Reviewers (see page 48).

The initial contact was rated highly with 78 per cent of residents being satisfied with the speed of first contact by the officer and 82 per cent of respondents feeling that they had been fairly treated.

However, the survey did identify two areas, where although satisfaction levels were reasonable, a significant element of dissatisfaction was registered. The rating for communication by the officer in terms of keeping the user informed of progress showed that 19 per cent of respondents were dissatisfied. There was also dissatisfaction with the officer's ability to resolve the problem, where 21 per cent were dissatisfied. Improvement in these two areas will form an important part of the Service Improvement Plan (see SIP action plan 17). A similar split was identified when users were asked to rate staff on a scale of 1 – 5 (5 = very good and 1 = very poor) 65 per cent averaged at good (score 4 or 5) whilst 18 per cent averaged at poor (score 1 or 2).

Awareness of our services was around 50 per cent though higher in some areas like Pest Control (88 per cent) and lower for Residential Housing (40 per cent). This is clearly an area to address (see SIP action plan 17).

For more survey results see Appendix 8.

6.4 Key Findings of the Resident Reviewers Exercise

This exercise was undertaken for all of the contact lines of the Council and the summary used a background paper to this report. The Resident Reviewers showed a high level of satisfaction. This was particularly the case with the length of time to answer the call as 86 per cent of calls were answered within 15 seconds. All advice was understood and the reviewers felt that the calls were handled well.

Two criticisms were made: the lines were too quiet, and a summary of the key facts was not always repeated back to the caller. Improvements can be made to correct these weaknesses. For more results see Appendix 8.

6.5 Key Findings of the Residents Panel

Although only 10 per cent of respondents had actually used any of the services, many of the findings reinforced the themes found in the telephone survey. 75 per cent of respondents were satisfied with the speed of the initial response. A strikingly similar pattern was also recorded for satisfaction levels with 61 per cent of respondents being satisfied with the way their case was dealt, whilst 22 per cent were dissatisfied.

When asked to comment on the Department, the most commonly mentioned issue was that the Environmental Health and Trading Standards Department did not appear to be able to take actions on issues highlighted or that it was not publicised sufficiently. For more results see Appendix 8.

6.6 Key Findings of the Departmental Staff Survey

The staff questionnaire, focused on the structure and internal effectiveness of the Department as a whole. The results were good in that 73 per cent of staff felt the overall structure was effective. There was, however, an acknowledgment that the structure was not robust enough to promote the new challenges posed by the public health agenda.

70 per cent of staff feel that the Department's and teams' objectives are clear and understandable and 71 per cent feel the Department has the right skills to do the job. 73 per cent feel that communication with customers is appropriate and effective and only 10 per cent disagree. This finding contrasts with the levels recorded in the survey of service users (see page 47), and indicates a need to reinforce the importance of the customer relationship and to look at retraining some staff in customer service skills. (see SIP action plan 15)

Communication seems to be an issue, with little or no time assigned to promoting the work that teams are doing. There is an occasional breakdown of communication between teams. The Health and Safety Team and the Food Team both carry out Health and Safety enforcement work and operate under the same powers. However, the split of enforcement work between the 2 teams causes confusion occasionally. Acting up arrangements have also affected lines of communication and this needs improving at every level and in every format. There is a need to engage with stakeholders to establish their needs and agree a strategy and implementation plan to deliver those needs and then monitor and review plans with stakeholders.

For more results see Appendix 8.

6.7 Key Findings of the Corporate Staff Communication Survey

The perception of strong support from colleagues has increased from 74 per cent in 2002/03 to 79 per cent in 2006, and an understanding of how individual objectives contributed to the team objectives rose from 82 per cent to 87 per cent over the same period.

In 2006, 77 per cent of staff felt well treated and 79 per cent said they enjoyed working for Kensington and Chelsea.

6.8 Key Findings of the survey of Councillors

The response rate to the Councillors' questionnaire was 19 per cent, which limits the validity of the findings.

Councillors felt that the views of the residents were most important in determining the level of services; government initiatives were considered the least important. Most Members who responded viewed Environmental Health and Trading Standards services as very important or important, with the investigation of food safety complaints being seen as marginally the most important.

On average half of the Members who responded thought that no expansion of the service was needed. Health and safety complaint investigation was identified by three Members as requiring expansion as a priority, and four Members considered that pest control treatments required expansion, but not as a high priority. There was a significant level of 'don't know' or 'no response' which may indicate a lack of awareness of service provision even among Members, and this needs to be addressed.

For more results see Appendix 8.

7. Comparison

An important component of the Review was to compare services offered by the Royal Borough with those of other London authorities. CIPFA publish annually a set of data comparing performance and costs across London. The data are not audited, and it is clear that different boroughs are organised differently, or interpret the requirements of the CIPFA returns differently. (For example some boroughs report premises related expenses at zero, while one reports a figure closer to £1 million; several report income from recharges of zero, while one reports income from recharges of almost £2 million). Nevertheless, the CIPFA data are the best available evidence on comparative staffing levels, on demands on the service, and on the number of inspections, and enforcement actions.

The overall picture emerging from the CIPFA data is of a relatively high cost, relatively high performing service. Net spending on Environmental Health functions (excluding Licensing) was the third highest in London in 2005/06. In return there is evidence that the Department is at or close to the top of the London tables in relation to Health and Safety inspections, and Housing inspections, and is close to the top in terms of the number of enforcement actions, notices, and written warnings issued by the Food, Health and Safety, and Housing Teams.

A set of tables extracted from the CIPFA data is available as a background paper if required.

The weaknesses of the CIPFA data, particularly its lack of qualitative information, led the Review team to seek comparisons through a questionnaire to 10 other boroughs, with follow-up visits to gather further information in several cases. The intention was not so much to compare the nature of operational services (e.g. inspection programmes), but to gather information on how other boroughs are changing to meet new demands.

7.1 Key Findings from Comparison Questionnaire

The questionnaire is shown in Appendix 9. Seven completed questionnaires were received. Key findings were as follows:

- The majority of authorities have a 'vision statement' which is well-known by staff. All respondents had business plans that linked to their strategic aims.

- There was no consistency in terms of the value placed on services by Councillors and residents, although two cited their pest control and housing services as highly valued.
- Most authorities use contractors (on average 9 contractors per authority) but none saw the role of contractors as likely to expand and there was no consensus as to whether contractors represent good value for money.
- All respondents have received external grant funding recently (with DEFRA, FSA and TFL each mentioned twice).
- Most authorities had made changes to services in response to the Public Health agenda. Only one had changed its structure. Five of the respondents were working with partners in new ways, the most frequently mentioned partners being the Police and the PCT.
- Most respondents charge for services, although only one expected to extend charging arrangements.
- Five authorities contract some services out, but only one had plans to expand this area.
- Five respondents had considered the use of shared services.
- All authorities were actively pursuing flexible ways of working, including home working, and most saw significant benefits in flexible working with no perceived disadvantages.

A summary of questionnaire findings is shown in Appendix 10.

7.2 Key Findings from the Comparison Visits

Visits were made to Ealing, Westminster, and Hammersmith and Fulham.

Public Health Agenda - Both Ealing and Westminster have enthusiastically grasped opportunities for joint working with the PCT on public health issues. Both have jointly funded posts, with Ealing putting considerable emphasis on sustainability/food matters, and Westminster reporting considerably increased political enthusiasm for Public Health. A jointly funded Public Health Co-ordinator at Westminster has been created to implement a number of initiatives which includes smoking cessation and 'workplace health' issues such as stress management. These are being funded using 'smoke-free' funding from the Department of Health on public health initiatives.

Use of contractors - There has been a very high dependence on contract staff in Ealing in recent years. An 80:20 ratio has been accepted by Members in services such as Noise and Nuisance where staff have been very hard to recruit. The picture was different in Westminster, where no Environmental Health or Trading Standards services are currently contracted out. The food hygiene service was

brought back in-house around three years ago following the failure of an external service to reduce costs or improve quality. Westminster had no plans to change this approach, and any agency staff deployed were used only to fill gaps. Westminster had taken the decision not to use contractors for low-risk inspections, and no longer carry out low-risk food inspections (category D and E) – they have not been afraid to confront the FSA in this respect.

Shared services - There appears to be more of an appetite to explore shared services in the Royal Borough than elsewhere. There is a view amongst other authorities that efforts to secure shared services should be concentrated in those areas that have high volume/high costs and where significant savings can be achieved. In West London this means priority is being given to shared services for contact centres, back office functions and the use of collective purchasing power to secure goods and services. Our most receptive partner at the moment is Hammersmith and Fulham and whilst an approach three years ago foundered on significant differences in standards and capacities, the Department will continue to explore opportunities with them and other authorities. We will also explore whether the London Centre of Excellence can offer support for the evaluation of shared services on a bigger scale.

Flexible Working arrangements - Ealing's office environment has been transformed through the total refurbishment of their Percival House offices to a fully open-plan hot-desking arrangement, creating a very agreeable and spacious working environment which has been well-received by staff. Westminster have recently relocated from Council House in Marylebone to City Hall, Victoria with newly refurbished offices and a ratio of four desks per five officers. Officers are allowed up to two flexi-days per month and, while there is no mandate for home-working at the present time, it is expected to increase in the future due to pressure to reduce reliance on very expensive fixed office space in the city centre.

8. Competition

The Review considered delivering Environmental Health and Trading Standards services through external contractors but the extent to which they can be used turns on whether the Council can discharge its regulatory duties lawfully and effectively through an external provider, without increasing its liability to legal challenges. And of course they must offer better value for money than the in-house service.

The conclusion is that there is no precedent in the UK for the successful outsourcing of these services on a large scale, and the market is unprepared and unwilling to take over entire Departments or services. The market is interested in taking on packages of tightly defined work (e.g. inspections) which give rise to fewer complications and which can be organised in a standardised way with a uniform quality control system. There is also a strong market in the provision of specialist scientific services.

8.1 Work that is currently outsourced

The Department has a long track record of using the private sector to deliver specialist services. The most sizeable contract (annual value around £80,000) is let by the Food and Health and Safety Training service for delivering the majority of the routine training programme. The Food Team also lets a contract for inspecting lower risk food premises (annual value around £18,000).

The Environmental Quality Unit lets several contracts for maintaining its air quality monitoring network (value around £60,000 over three years) and lets a small contract for inspecting petrol filling stations – value £1,500.

From time to time individual teams hire inspectors on temporary contracts through agencies and consultants in order to bridge gaps in permanent staffing, or on one-off projects, for example house condition surveys. Contractors/Consultants are also used where specialist expertise is needed, for example in health and safety investigations, or complex noise problems.

In some areas, for instance contaminated land investigations, costs associated with the use of specialist external consultants have been reduced by developing in-house expertise.

Recently the Trading Standards service has transferred most of its consumer advice function to a London-wide service – Consumer Direct. For the time being the Office of Fair Trading is using central

government funding to maintain the service and so there is no charge to local authorities.

8.2 Opportunities for increasing outsourcing

The Review Team has considered opportunities for increasing the amount of work carried out by contractors, but has concluded that there is limited scope for this.

A detailed evaluation of further outsourcing was conducted in relation to work on contaminated land and the regulation of 'Part B' processes (filling stations, paint-sprayers and dry cleaners). It was found that in-house service delivery was cheaper.

The food inspections contract has already started to extend into the delivery of medium risk category inspections. However further transfer of responsibilities to the private sector – for example inputting data from inspections onto the Council's database – would significantly increase costs. This position may change once digital inspection recording becomes established.

The Review Team identified small areas of work that could be considered for contracting out, for example typing services and some limited administrative tasks. There might also be scope for using consultants for some small-scale Health and Safety project work. However the scope for cost savings is limited.

A more promising approach could be to seek economies of scale through joint work with other boroughs or consortia, as Trading Standards has done through Consumer Direct. This could be extended, for example in relation to health and safety inspections of multi-outlet premises. This approach has been adopted by Broadland District Council, which has entered into a consortium with two other local authorities (South Norfolk and Norwich City Council) to deliver several environmental services jointly.

8.3 Conclusions

Large-scale outsourcing of the Department's regulatory services is not feasible at present. Commercial providers currently have no appetite for this kind of contract, and enquiries of other London authorities confirm that this is not on their agenda. There are some limited opportunities to increase the amount of work carried out by contractors, but significant cost savings would not result. The most promising way forward lies in joining other boroughs in shared services to benefit from potential economies of scale.

9. Cross-cutting themes

9.1 Personnel Information

A very detailed analysis of recent personnel management information has been prepared, and is available in full as a background paper. The main findings can be summarised as follows.

Workforce Profile The environmental health and trading standards workforce is male-dominated, increasingly diverse and ageing. An unusually high proportion of the workforce has long service with the Council, with a very high number of officers in the same post that they occupied 10 years ago.

Turnover. Turnover is exceptionally low (4.1 per cent), and as a result many staff are at the top of their scale.

Recruitment. The number of applicants for vacant posts has dropped very sharply over the period 2004-2006.

Sickness absence. Average sickness absence has been increasing over the last 4 years, and is now 9.3 days per person. This is higher than the average for the Council, but lower than the average for all London boroughs. Much of the increase can be attributed to an increase in long term sickness experienced by a small number of staff.

9.2 Key Findings on Personnel Information

The unusual **age profile of the workforce** carries with it the risk of a damaging and sudden loss of expertise as, on present trends, several highly experienced staff are likely to retire over a short period of time in the foreseeable future. It is worth developing control measures against this risk, for example by re-assessing the professional development of staff.

The **low turnover of staff** carries with it the risk of stagnation but great attention has been given to moving staff around the Department through secondments and periods of acting-up, so this is not perceived to be a problem.

The dramatic **decrease in the number of applicants** for posts is of great concern but the Modernisation Programme will present flexibility around working arrangements that should prove more appealing to prospective staff than the more traditional approaches of most other local authorities. If this doesn't work a re-examination of pay and benefits will be necessary.

Recruitment is an issue. Due to shortages of professional staff in Environmental Health and Trading Standards generally, there are difficulties associated with recruiting to specialist posts and retaining permanent staff. The current travel costs, increasing house prices and the introduction of the congestion charge are all contributing to these difficulties.

The recruitment process tends to be lengthy and time consuming and there is lack of adequate corporate help. More help is required from the Personnel services in terms of **streamlining the recruitment process** that managers have to deal with when staff leave the Council's employment. The Department needs to give priority to retaining staff and encouraging the fulfilment of their potential.

HHASC Workforce Development Strategy will shape the Department's response to these issues.

9.3 Administration

The Challenge exercise identified administration as an area for improvement (see page 37). Many repetitive clerical duties are taking up managers' time at the expense of the leadership and management of their teams. It was considered that a more cost-effective use of management time would be achieved by transferring certain functions to the Operational Support Unit (OSU), leaving managers to concentrate on higher value work.

An administration service improvement list has been constructed (see SIP action plan 3 and 4). The improvements proposed include increasing OSU support for managers in discharging the following functions: staff recruitment; maintaining training records and controlling the training budget; maintaining Investors in People registration; submitting statistical returns to government agencies; administering 'self-inspection' systems for low risk premises; notice processing; and contaminated land searches.

9.4 Information Technology

Information technology (IT) was identified as an area for improvement in almost all of the Challenge reports written by the managers (see page 37). As a result an IT service improvement list has been constructed (see SIP action plan 11).

The majority of the areas identified involve service improvement through increased efficiencies of processing information by the information system Acolaid, introduced in 2005. Many of the

improvements involve realising the full benefits of the system that were anticipated at purchase. Capital funds were set aside at the procurement stage for these developments and so no major extra investment is needed to achieve this.

Efficiencies can also be expected by extending the use of the automatic document generator facility in Acolaid. This would considerably reduce officer time in the drafting of letters as the generator automatically populates fields that traditionally would have been typed in. In addition to these developments an effort to streamline procedures and processes in Acolaid needs to take place and this could provide efficiency gains. (See page 56 administration)

The improvement of performance management was identified in the 'Challenge' section of this report (see page 37), particularly for the Housing and Trading Standards teams. The embedding of this in procedures and the production of supporting monitoring reports for all teams is an area identified for IT development (see SIP action plan 10). This will be critical for measuring increased productivity and evidence of better interaction with the residents - identified as a priority in the consultation exercise (see page 47).

New IT applications, including the use of a digital pen for data capture, are being actively piloted for use across the Department to maximise efficiency and avoid duplication of work. Digital pens should produce efficiency gains through capturing information on site electronically and automatically updating Acolaid without any additional inputting by the officer. If coupled with G3 technology it will have the added benefit of providing an instant up to date record on site which will bring great advantages for some of the teams (see page 71 efficiency gains). Field-working and customer service is constrained by the lack of access to data held by Acolaid when officers are out in the field and we are exploring ways of providing officers with remote access to this data.

The consultation exercises identified opportunities to improve customer 'self service' and the provision of information on the web. Current examples of this are the 'Scores on the Doors' scheme, giving details of the latest food hygiene inspection, and viewing housing complaints on-line. There is scope for extending these services through improvements to the Department's website, and the use of customer relationship management software.

There is scope for the development of alternative forms of service delivery, such as online application systems giving residents the ability to complete HMO Licensing and Grant applications on the

Council's website. Food businesses would also benefit from being able to register their business online and then book a relevant training course.

SOCITM Consulting undertook a review of the Council's business group IT support in 2006. It recommended a number of changes including a review of IT support staff roles and the establishment of service level agreements for the provision of services. These have been included in the SIP action plan 13.

9.5 Community safety

The Department makes an active (and increasing) contribution to the Community Safety agenda. For several years an officer in the Housing Team has been working part-time on secondment with the Community Safety Team. The officer's responsibilities are wide-ranging and include various initiatives to combat crime and disorder and anti-social behaviour, such as 'alley-gating' and other urban design features to improve the local environment and deter perpetrators of anti-social behaviour.

A considerable amount of the officer's work is in 'target hardening', aiming to bring down residential burglary by encouraging landlords to upgrade security measures. Notable success has been achieved in certain burglary 'hot-spots' in the borough.

Joint work has taken place with the police over the application of new Housing Act provisions relating to HMO Licensing and the new 'hazard rating' fitness standard which are being used to complement home security initiatives. Under the Council's Private Sector Renewal Strategy, a new form of financial assistance was established - a 'Safe as Houses' grant - to provide funding for home security measures.

Other sections within the Department also make a contribution to Community Safety, notably the Noise and Nuisance team which deals with a significant number of domestic noise issues involving anti-social behaviour. The Noise and Nuisance service also contributes annually to the Metropolitan Police's 'Junior Citizen' event which aims to teach young people about safety (both within and outside the home) and the consequences of irresponsible behaviour.

A further area of joint work with the police lies within the remit of Trading Standards who are routinely involved with anti-fraud and anti-counterfeiting measures (particularly in the Portobello Road market) and also strive to prevent under-age sales of alcohol, tobacco, solvents and knives. The service enjoys a good working

relationship with the police and reports on its work to the Safer Surer Partnership Board.

9.6 Sustainability

The Department makes a number of different contributions to sustainability: -

- The private sector housing team drives the Council's affordable warmth strategy which targets low income householders in fuel poverty and, through grants and other approaches, reduces fuel use and therefore CO₂ generated.
- Environmental Health, in partnership with others, created the flagship HMO which is a beacon of good practice in terms of fuel efficiency and reduction in CO₂ generation even within the heavy conservation constraints of Kensington and Chelsea.
- The Environmental Quality Unit's work on air quality (recently recognised by being short listed as a national Beacon) contributes to sustainability, as does its work on contaminated land remediation. This unit in conjunction with the TELS business group is also writing a 'Green Development Guide' which aims to assist and inform developers and residents on sustainable design and development.
- Trading Standards' work on regulation ensures that false claims of sustainability in the supply of goods and services in the borough are investigated and dealt with where they are brought to the Council's attention.
- Finally the Modernisation Programme referred to elsewhere in this report will lead to greater efficiency in travel, reducing journeys and both atmospheric pollution and CO₂ generation.

9.7 Freedom of information requests

The number of information requests received by the Department has dramatically increased since the introduction of the Freedom of Information Act in 2005. The level of requests has not only increased in volume but become more broad ranging and complex. In the future some information can be made more available through the use of web publishing including scores on the doors (see IT page 56) but is likely to fuel further interest as residents become more informed.

The resultant increased workload must be included in the Department's business planning process and resource allocation. In

the future the level of requests must be monitored to manage this area of work effectively.

Year	Number of Requests
2005	57
2006	90
2007	152*

* denotes projected requests from the first three months of 2007.

9.8 Diversity and Equalities Impact Assessment (EIA)

Introduction

This is a short version of a longer report that is available as a background paper if required. The full text sets out a summary of the Council's policies and legal obligations; these are taken as read here.

Delivering fair, relevant and accessible services

The Environmental Health and Trading Standards Department has taken steps to make its services fairer, more inclusive, and accessible. For example the Department provides health promotion advice to a wide range of groups including Sixty Plus, Help the Aged, residents with learning difficulties, non-English speaking food handlers, Moroccan ladies groups, Somalis, and Travellers. Food Hygiene information is provided in more than one language and in a non-verbal training DVD. Outreach work has been done to raise awareness on energy efficiency and housing services through talks and seminars to vulnerable residents and Black and Minority Ethnic groups. The Department helps improve access to appropriate housing for people with physical disabilities, increasing the supply of such housing through grant aid and regular communications with occupational therapists.

The Royal Borough Review incorporated a screening exercise to determine which of its services would most benefit from carrying out an Equalities Impact Assessment.

Action:

- The Training Service and Trading Standards teams have been included within the programme of equality impact assessments for the three years from 2008-09 to 2010-11.

Informing, communicating with and consulting residents

In January 2007 Environmental Health commissioned a survey of users of the service; the number of responses was more than adequate. The principal findings of the survey of residents were that respondents with disabilities were marginally less likely to be satisfied with the service than respondents without disabilities;

female respondents were significantly more likely than men to say that they were not well informed about the Department's services; non-white respondents were significantly less satisfied with the outcome of their enquiries than white respondents, and were more likely to say the service they received fell short of their expectations – both in terms of outcomes and fair treatment; non-white respondents were significantly more likely to say they did not feel well-informed about the service than white respondents (this was true both of residents and business respondents). That said, non-white business respondents expressed higher levels of satisfaction with the service than white business respondents.

Action:

- The Department should make a determined effort to raise awareness of its services – and to publicise realistic expectations - using a variety of communication methods and taking into account the needs, language, and expectations of groups that report they are ill-informed about services.
- Ensure that Environmental Health Line has access to and is using the Council's telephone interpreting service, and is able to use the Council's video link to British Sign Language interpreters.
- Ensure that all staff take up the diversity training on offer, and take advantage of training sessions to cover the needs of specific groups of customers in more depth, e.g. faith groups, or residents suffering from poor mental health, or hearing or speech impairments.
- Ensure that the complaints procedure is accessible and supportive, and is geared towards learning and improving the service in response to customer feedback.

Our workforce: reflecting the community we serve

A short analysis of the characteristics of the workforce is also included in the section on personnel issues. The Department is male-dominated (not unusual in these professions), is ageing, and has become significantly more diverse in recent years. The Commercial Division has a somewhat lower proportion of Black and ethnic minority staff than other parts of the Department. 3 per cent of staff state they have a disability.

Action:

- Adapt recruitment advertising to encourage more applications from women and younger people, and to encourage more applications from Black and ethnic minority candidates for posts in the Commercial Division.

- Aim to increase the proportion of all staff that have a disability by examining the feasibility of creating homeworking posts for people unable to travel to work
- Work with Kensington Recruitment to provide work placements for residents with disabilities.
- Encourage BME staff to access the mentoring scheme aimed at supporting their career development

10. Savings - Option Analysis

10.1 Option 1

This option is recommended by officers. It proposes:

- Adopt the SIP
- A reconfiguration of the current management structure so that it is better able to meet the new public health agenda and other demands
- Centralisation/rationalisation of overly bureaucratic processes
- Continued support for the Department's 'Modernisation' programme to obtain efficiency/ productivity gains
- Re-investment of identified cashable efficiency gains (arising from technological advances) back into the service to achieve important service improvements (see SIP).

Savings: These improvements present cashable savings of **£157,000** and non-cashable savings of **£37,500**.

Cashable Savings	Value
Reduce management posts	£30,000
Reduce IT Licences	£20,000
Reduction in office space	£105,000
Cashable efficiency savings*	£22,000
Total	£177,000
Restoring RBR Noise and Nuisance investment*1	-£20,000
Net saving	£157,000

Non Cashable Savings	Value
Removal of unused staff parking spaces	£10,000
Non-cashable efficiency savings*	£27,500
Total	£37,500

Net total Cashable and Non Cashable Savings	£194,500
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* Further detail on efficiency savings is in Appendix 11. A total of £49,500 is offered through efficiency gains.

*1 At the conclusion of the RBR of Noise and Nuisance Members agreed to re-invest in the service the £20,000 savings identified.

Using less office accommodation

During this Review plans have been put into place to reduce the office accommodation of the Department by one third, and a series of moves have been planned that will see this implemented by the autumn. The Department is reducing its use of office accommodation so that Parking Operations can re-locate to the Council Offices, Pembroke Road, thus freeing up the Young Street office and saving the Council the cash outlay on those leased premises. The Executive Director for Finance has agreed that a reduction in accommodation that facilitates the move away from Young Street can be regarded as a cashable saving, and so £105,000 (over 2007/8 and 2008/9) is included as a cashable saving in option 1 and 2. It is worth noting that the re-charge for this accommodation is a higher value of £131,000 and this sum rather than the cash calculation will be used to recalculate the unit costs of the Department.

Advantages

This approach will de-layer the management structure so that it is consistent with other authorities, but also offer an important new focus and challenging new jobs for a range of managers. It will provide capacity to meet increasing external and corporate challenges, in particular the new public health agenda. It offers manageable cashable and non-cashable savings and exceeds the Review's savings target.

Disadvantages

There will be some loss of opportunity for staff who are not managers and, given the constraints around early retirement and redundancy, it will be necessary to move towards a final structure in a phased way that may not see the savings in relation to the restructure materialise quickly.

10.2 Option 2

This option is not recommended by officers.

It proposes no change from existing arrangements, but would continue to allow the management of the Department to improve

services incrementally through its Modernisation Programme. This approach has produced an average annual cost saving of 3 per cent over the past 5 years and would offer the level of saving required by the Review.

Savings: This option presents cashable savings of **£127,000** and non-cashable savings of **£37,500**.

Cashable Savings	Value
Reduce IT Licences	£20,000
Reduction in office space	£105,000
Cashable efficiency savings*	£22,000
Total	£147,000
Restoring RBR Noise and Nuisance investment*1	-£20,000
Net saving	£127,000

Non Cashable Savings	Value
Removal of unused staff parking spaces	£10,000
Non-cashable efficiency savings*	£27,500
Total	£37,500

Net total Cashable and Non Cashable Savings	£164,500
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* Further detail on efficiency savings is at in Appendix 11. A total of £49,500 is offered through efficiency gains.

*1 At the conclusion of the RBR of Noise and Nuisance Members agreed to re-invest in the service the £20,000 savings identified.

Advantages

The Department has shown its ability to deliver savings over the last three years and this option would least disturb the operation. No time would be spent in restructuring the management roles and the inevitable anxieties that accompany change and detract from performance would be avoided.

Disadvantages

This option would not configure the management structure to meet the demands of the new public health agenda and other internal and external demands.

10.3 Option 3

This option is not recommended by officers.

In addition to either option 1 or option 2, Members may choose to make much more radical reductions in service levels that could lower the costs of the Environmental Health and Trading Standards service by up to £1,283,500. These reductions, if taken in full, would see the cessation of all discretionary service provision, and would reduce capacity to deliver statutory regulatory services.

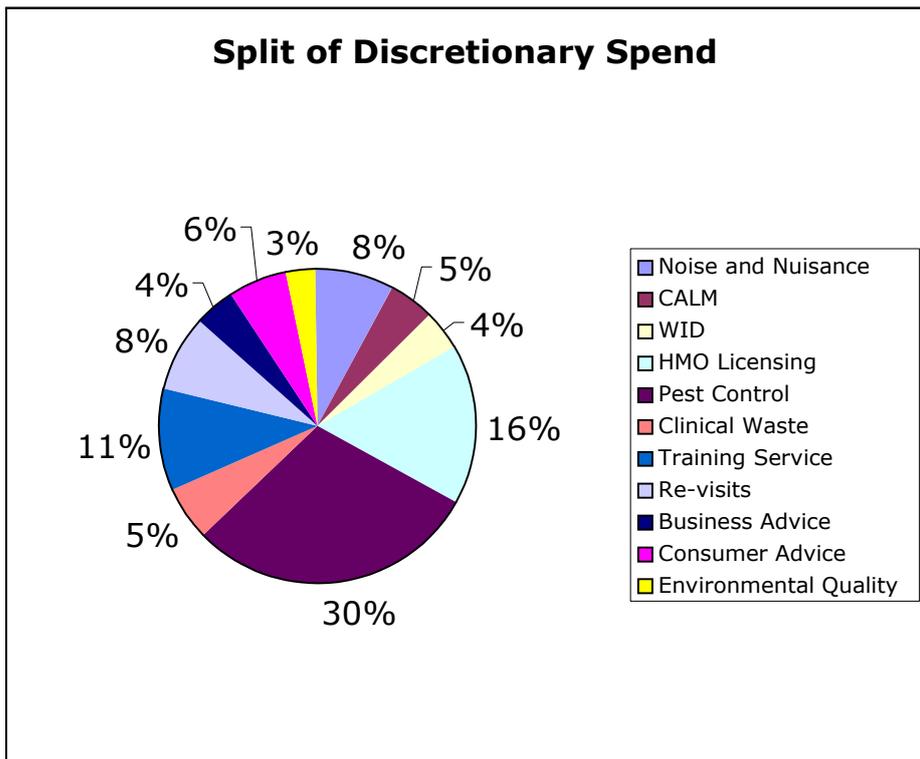
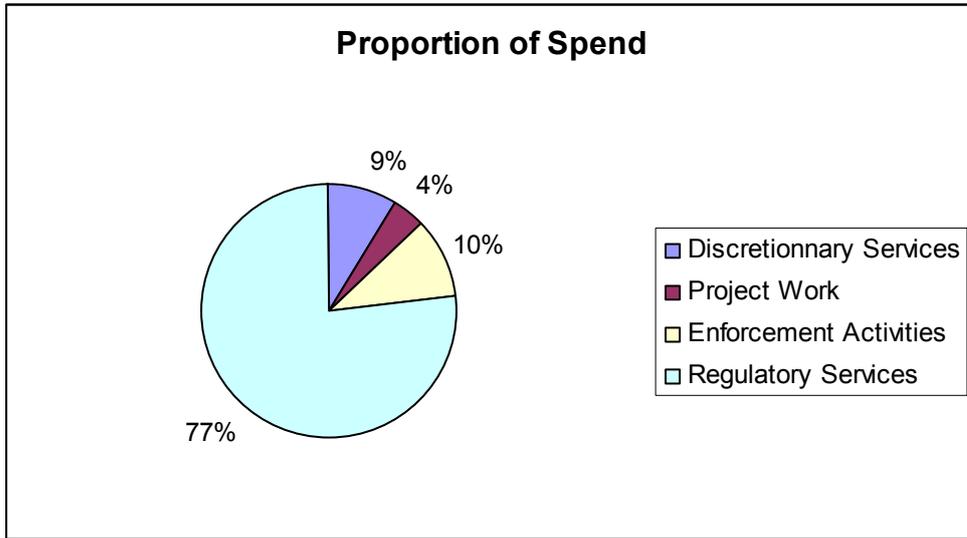
Reduced Service Levels	Value
Discretionary services	£491,500
Statutory services	£572,000
Project work	£220,000
Total	£1,283,500*

*Additional implementation costs will be incurred.

Impact of reductions in discretionary and statutory services

The following paragraphs list the non-statutory services and some statutory areas where Members could consider reducing investment with consequent savings. The Department has already removed much of its low priority work through the Council's imperatives and opportunities process. The option outlined here would mean deleting further services, some of which have hitherto been considered a high priority (e.g. pest control services). There would be significant service and public relations impacts associated with these reductions and these impacts are briefly described in each case. A fuller statement of impacts, risks, and the benefits of retaining these services are included in Appendix 1 and Members are asked to take this fuller statement into account if they are minded to consider accepting the offered savings.

This table shows the potential savings in the context of the overall spend on Environmental Health and Trading Standards services.



Description of discretionary services from which funding could be withdrawn.	Expenditure	Income	Net Saving	Impact/risks	Borough (see note below)		
					Westminster	Hammersmith	Ealing
Non statutory noise and nuisance investigation.	40,000	N/a	40,000	This would entail a considerable reduction in the level of service currently offered, exacerbating neighbour problems and adversely affecting the quality of life for some residents.	√	√	√
CALM (noise mediation service)	22,500	N/a	22,500	As above; it would remove a useful, informal method of problem resolution.	X	√	√
Work in Default for recipients of statutory notices	35,000	15,000	20,000	This would allow no recourse other than prosecution where landlords were failing to provide fit conditions of habitation for tenants. The probable outcome would be poorer housing conditions for considerably longer for some residents.	√	√	X*
Proactive HMO visits	80,000	N/a	80,000	The withdrawal of monitoring to ensure compliance with regulatory standards in the highest risk premises would result in deterioration of standards adversely affecting the quality of life and safety of residents in those premises.	√	√	X
Pest control services	352,000	207,000	145,000	Residents requesting a service would be directed to use private pest control companies. The practical result would be that fewer infestations would be treated and the level of infestation would be likely to increase requiring investment in the enforcement side of pest control.	√*	√	√

Description of discretionary services from which funding could be withdrawn.	Expenditure	Income	Net Saving	Impact/risks	Borough (see note below)		
					Westminster	Hammersmith	Ealing
Clinical waste collections	27,000	N/a	27,000	Vulnerable residents would have to arrange and pay for the collection of their own clinical waste	√	√	√
Food Safety and Health and Safety Training Service	217,000	165,000	52,000	The deletion of this service would drastically reduce the number and affordability of courses and hence the level of training and expertise of employees within businesses. The reduced level of training would then impact on the standards of those businesses potentially increasing the need for enforcement and the incidence of food borne disease.	√*	√	X
Food safety and health and safety re-visits	40,000	N/a	40,000	This would mean not verifying that the improvements required after inspection had been delivered. This would probably lead to a decline in the standards of some premises.	√	√	√
Business advice on food safety and health and safety	20,000	N/a	20,000	By withdrawing this service businesses would be left reliant on other sources of information, which they might not bother to seek. This reduction would reduce the ability of officers to influence businesses to achieve compliance with legislative requirements.	√	√	√
Consumer advice	30,000	N/a	30,000	Straightforward requests for consumer advice are referred to Consumer Direct. The remaining work is more complex and discontinuing the advice service would be extremely unpopular with residents as there are very limited alternatives available to them.	√	√	√

Description of discretionary services from which funding could be withdrawn.	Expenditure	Income	Net Saving	Impact/risks	Borough (see note below)		
					Westminster	Hammersmith	Ealing
Non Regulatory research on Environmental Quality	15,000	N/a	15,000	Reducing this capacity would diminish the ability of the Department to respond to regional and national policy initiatives and alert the Council to risks that may be associated with new policy.,	X	√	√
Total	878,500	387,000	491, 500				

√ Indicates borough undertakes services X indicates borough does not undertake services

*Indicates where the comparison borough has either recently commenced/expanded those services or is planning to do so.

Description of statutory service from which funding could be reduced.	Expenditure	Income	Net Saving	Impact/risks	Borough		
					Westminster	Hammersmith	Ealing
Enforcement activities by health and safety, food safety, trading standards and private sector housing teams which have arisen as a result of statutory duties	572,000	N/a	572,000	This would reduce the number of enforcement actions taken; there would be significantly fewer prosecutions, cautions, emergency closures, and improvement notices. The Department would be largely reduced to an inspectorate and a complaint handling function. Where in the most serious cases formal enforcement through the Courts was considered, the time taken on legal proceedings would reduce the Departments capacity to deliver the core inspection/complaint handling functions.	√	√	√
Project work supporting national and local priorities	220,000	N/a	220,000	The loss of capacity to conduct project work such as joint operations with the Police, Food Safety week and the Chelsea Flower Show would significantly diminish the Department's responsiveness to local priorities. It would also force withdrawal from participation in national initiatives, which could prejudice the Council's reputation and funding.	√	√	√
Total	792,000		792,000				

11. Efficiency Gains

In addition to the cashable savings on controllable budgets and the non-cashable savings on non-controllable budgets, this Review and the Department's modernisation project have identified further cashable and non-cashable efficiency gains totalling £49,500. Two of these result from the use of digital pen technology to reduce workload for the front-line staff. Using this technology equals approximately half an EHO/TSO post spread across several teams. Members could decide to take this saving but realising it when it is dispersed through 3 service areas poses a practical implementation problem at this stage. The recommendation of the Review is to allow reinvestment of the estimated savings arising (£22,000) until the full potential of the technology has been proved. This would in the meantime increase our capacity to deliver important service improvements identified in the Review (see SIP).

There are grounds for optimism that with advances in digital pen technology, and with the resultant changes in working practices, we should see further improvements in productivity and efficiency. It is anticipated that future efficiency gains will become cashable as this technology is rolled out across the Department and it will be the task of the new Service Improvement Manager to make this happen through reductions in the number of front line staff needed to deliver current levels of service. Resultant cashable efficiency gains will be offered during future cycles of the Imperatives and Opportunities process.

Identified Efficiency Gain	Approximate Saving
Centralisation of recruitment process. (Non cashable)	£12,000
Centralisation of budget administration. (Non cashable)	£14,000
Centralisation of officer training administration and budgets (IIP). Non cashable)	£1,500
Use of digital pen for Noise and Nuisance officers updating complaints. (Cashable)	£16,000
Use of digital pen to record risk-assessed inspections (Food Safety and Health and Safety teams). (Cashable)	£6,000
Total	£49,500

(For more details see Appendix 11).

12. Summary and conclusions

The Royal Borough Review of Environmental Health and Trading Standards has been conducted in accordance with the requirements of the Purpose and Scoping Report agreed by the Cabinet, and within the framework for local best value reviews.

The Review has been conducted at a time when the Department is facing some significant policy challenges, notably an increase in pressure from government for deregulation, a continuing requirement to make efficiency savings, and the development of a new public health agenda.

Consultation exercises indicate that the Department is highly valued by residents, and even by businesses on the receiving end of enforcement action.

The Review has found that the Department is relatively high cost by comparison with other London boroughs, but it delivers a relatively high performance in terms of the number of inspections done and enforcement actions taken.

The Review found little evidence of a mature market in the provision of private sector environmental health or trading standards services, and the scope for outsourcing service provision at present appears to be very limited.

The Review Team recommends that the Department should:

- Re-focus on the goals of the new public health agenda based on more comprehensive background and outcome data
- Gain efficiencies through improving the Department's structure
- Maintain high levels of performance and continually improve
- Improve the customer experience
- Improve residents' and customers' awareness of the services offered
- Continue to monitor factors which influence the BVPI and CPA framework
- Develop and diversify the workforce
- Engage with neighbouring boroughs on shared services

The actions required are set out in the attached SIP.

The Review Team offers Members three options for savings:

Option 1, which is recommended by officers, would offer cashable savings of **£157,000** and non-cashable savings of **£37,500**. Members are asked to re-invest the **£22,000** cashable efficiency savings back into the service to deliver important service improvements.

Option 2, which is not recommended by officers, would offer cashable savings of **£127,000** and non-cashable savings of **£37,500**. Members are asked to re-invest the **£22,000** cashable efficiency savings back into the service to deliver important service improvements.

Option 3, which is not recommended by officers, would offer reductions in service levels could lower the costs of the Environmental Health and Trading Standards service by up to £1,283,500. These reductions, if taken in full, would see the cessation of all discretionary service provision, and would reduce capacity to deliver statutory regulatory services.

Members are **RECOMMENDED** to endorse the findings of the Review, to endorse the SIP, and to agree Option 1 above.

Paul Morse
Director for
Environmental Health and
Trading Standards

Jean Daintith
Executive Director for Health
Housing and Adult Social Care

Royal Borough Review of Environmental Health and Trading Standards

Service Improvement Plan

Key: - DEH Director of Environmental Health; HSEPS Head of Service for Environmental Quality, Public Health and Service Improvement
 HSC Head of Service Commercial HSR Head of Service Residential SIM Service Improvement Manager
 UL Unit Leader OSU

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
1. 	Option 1 4.4	Improve the overall effectiveness of the Department	Managerial re-structuring and job re-definition.	DEH	Management Time/Personnel Time	By 30 June 2008 complete Departmental restructuring
2. 	Option 1 4.4 12.0	Increase the capacity to respond to external demands and drive continuous improvement	The creation of a Public Health and Service Improvement Division, a Service Improvement Manager, and three Policy Officer posts.	DEH	Management Time/Personnel Time	By 30 June 2008 appoint to all policy posts

Royal Borough Review of Environmental Health and Trading Standards

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
3. 	9.3	Rationalising bureaucratic processes	Examine working methods to introduce more efficient back office processes e.g. the production of statistical returns and the use of OSU for alternative enforcement strategy on lower risk work areas.	HSEPS	Management Time/Officer Time	By 31 December 2007 complete task rationalisation
4. 	9.3	Transfer of administrative tasks to support services	Transfer the non-management functions of recruitment, training, and central budgets to support services.	UL	Management Time/Officer Time	By 31 December 2007 complete task transfer
5. 	9.3	Increase resources of OSU by recruiting Head Start Trainees	Using an existing vacant post this increased capacity will enable new tasks to be carried out and will be better value for money.	UL	Officer Time	By 31 December 2007 appoint trainees

Royal Borough Review of Environmental Health and Trading Standards

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
6. 	4.3, 11	Flexible working	Gains in efficiency from changes in work practices and evaluation of workforce required.	HSEPS	Management Time/Officer Time	By 30 June 2010 complete flexible working project and re-assess workforce requirement
7. 	4.3	Improve use of accommodation and reduce fixed costs	Implement a reduction in office space (by one third). Implement rationalisation of staff car parking.	HSEPS	Management Time/Officer Time	By 30 June 2008 complete accommodation rationalisation
8. 	9.4	Improve management of IT licences	Rationalise IT licences and develop a procedure to improve management of all licenses.	SIM	Management Time/BSU time	By 30 June 2008 implement procedure

Royal Borough Review of Environmental Health and Trading Standards

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
9. 	9.4, 11	Exploit technological advances in the use of IT equipment for field work and administrative tasks	Implement off site data capture (digital pens) and remote access to information to achieve long-term efficiency gains. Once these processes are in place evaluate the levels of workforce needed.	SIM	Management Time/ISD/BSU time *Capital costs already identified within capital spending	By December 2008 implement off site remote data capture
10. 	9.4	Improve performance monitoring on productivity	Establish benchmarking measure for productivity re digital pen and change in working practices, using performance monitoring reporting system.	SIM	Management Time	By December 2008 implement and monitor changed work practices
11. 	9.4	Maximise the effectiveness of Acolaid	Enhance the Acolaid processes across the Department including development for EQU, Trading Standards, Pest Control, and Housing.	SIM	Management Time/Officer Time	By December 2009 implement IT changes

Royal Borough Review of Environmental Health and Trading Standards

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
12. 	6.3	Improve internal and external measurement of performance	Develop a comprehensive performance monitoring system that focuses on the measurement of outcomes in Acolaid. Update RERC performance monitoring report.	SIM	Management Time/ BSU time	By December 2008 implement performance monitoring system
13. 	9.4	SOCITM report implementation	Harmonise work procedures in line with recommendation in SOCITM report as they apply to the Department.	SIM	Management Time/ BSU time	By March 2009 harmonise work procedures
14. 	6.3, 6.4, 6.5	Improve communication with residents	Develop, implement and monitor measures for customer interaction including consultation for customer satisfaction.	HSEPS	Management Time/Officer Time	By 30 June 2008 undertake ongoing customer consultation and review

Royal Borough Review of Environmental Health and Trading Standards

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
15. 	6.3 6.5	Improve response to service requests	Revise target response to all customer complaints/enquiries to within 24 hours. Develop and implement training to officers to improve the customer experience.	HSR	Management Time/Officer Time	By December 2007 respond all complaints and enquiries within 24 hours
16. 	6.3, 6.4, 6.5	Improve communication with service users	Develop mechanisms including self-service on web, Scores on Doors, on-line licensing applications. Increase use of document generation to produce standard letters at key stages of case.	HSC	Management Time/Officer Time/ ISD/BSU time	By June 2010 introduce self service and automated response letters to customers

Royal Borough Review of Environmental Health and Trading Standards

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
17. 	6.3 6.4 6.5	Increase residents awareness of the Department	Enhance the web site to include detail of the available services, service standards and the outcomes that are possible to manage expectations. Also examine other forms of communication e.g. in libraries, mailshots, community events vehicle.	HSR	Management Time/Officer Time	By December 2009 introduce new web pages for residents
18. 	4.4	Develop links with the PCT and other partner organisations on public health and well being.	Implement with the PCT the 'Choosing Good Health – Together' strategy.	HSEPS	Management Time	By December 2008 implement strategy action plans

Royal Borough Review of Environmental Health and Trading Standards

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
19. 	7.2	Shared services	Explore the possibilities of linking into a Trading Standards consortium and a possible shared service for clinical waste collections with Hammersmith and Fulham. Explore whether the London Centre for Excellence can offer support for the evaluation of shared services.	HSC	Management Time	By March 2009 complete evaluation
20. 	5.9	VFM assessment	Participate in the CIEH benchmarking group across London authorities which is looking specifically at Food Safety, Noise and Nuisance, and HMOs.	HSEPS	Management Time/Officer Time	By March 2008 commence statistical comparison

Royal Borough Review of Environmental Health and Trading Standards

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
21. 	5.5	Improve Pest Control business	Set up a trading account for the administration of Pest Control services. Identify options for increasing charges of Pest Control treatments taking into account any potential fall in demand due to increased charges. Examine opportunities for increased marketing.	HSC	Management Time/Officer Time/Finance Time	By December 2008 evaluate results of trading account and review charges
22. 	5.5	Expansion of the Training Service to attract additional income	Additional administrative support and options for a dedicated training room. Review current charging policy.	HSC	Management Time/Officer Time	By December 2008 assess scope for expansion and review charges
23. 	8.1	Improve the cost-effectiveness of agency staff	Follow the corporate policy on using agency staff, evaluate any benefits.	HSC	Management Time	By December 2007 implement policy

Royal Borough Review of Environmental Health and Trading Standards

 Short term actions (<6 months)		 Medium term actions (6-18 months)		 Long term actions (18-36 months)		
Action Plan No.	Link to Final Report Para	Improvement Objective	Improvement Method	Lead Officer	Inputs (Including Costs)	Outcome Target(s)
24. 	9.1	To develop a long term strategy for the retention and recruitment of top quality staff	Participate in HHASC Workforce Development Group and ensure findings of this Review are represented.	HSR	Management Time	By December 2009 implement policy and review
25. 	9.8	EIA	The Training Service and Trading Standards have been included within the programme of equality impact assessments for the three years from 2008-09 to 2010-11	HSEPS	Management Time/Officer Time	By June 2010 conduct impact assessments

Abbreviations and acronyms

BSU	Business Systems Unit
BVPI	Best Value Performance Indicator
CALM	Confidential and Local Mediation (mediation service)
CIPFA	The Chartered Institute for Public Finance and Accountancy
CPA	Comprehensive Performance Assessment
DEFRA	Department of Environment, Food and Rural Affairs
EIA	Equalities Impact Assessment
EQU	Environmental Quality Unit
HHASC	Housing, Health and Adult Social Care
FSA	Food Standards Agency
HMO	Houses in Multiple Occupation
OSU	Operational Support Unit
PCT	Primary Care Trust
PPU	Policy and Partnership Unit
RBKC	Royal Borough of Kensington and Chelsea
RBR	Royal Borough Review
RSL	Residential Social Landlord
SIP	Service Improvement Plan
TELS	Transport, Environment and Leisure Services
TFL	Transport for London
TMO	Tenant Management Organisation
VFM	Value for money

Background Papers

Page Reference	
22	Team challenge documents
37	Financial Analysis
48	Resident Reviewers report
50	CIPFA comparative data
55	Personnel Analysis
60	EIA report
General	Financial data (costings) Efficiency evaluation Consultation reports Performance data Analysis day presentations External challenge report

Appendices

1. Justification for discretionary services
2. Officer project groups for the Review
3. The Better Regulation Agenda
4. Aims of the Review (Purpose and Scoping Report)
5. Team Challenge document
6. Performance statistics
7. Finance
8. Consultation summary results
9. Comparison questionnaire
10. Comparison questionnaire summary
11. Efficiency gains