

GTSP Business Case Consultation

10/10/2014

ID	Comments by Team/Individuals	Response
	Caerphilly CBC Trading Standards Staff	
	Service Resilience	
1	The document as provided fails to clarify any of the major issues that will be faced by a collaborative service and makes numerous bold statements which are either factually incorrect or are not supported at all by evidence	See Below
2	Draft business case mentions throughout that a Regional Collaborative Service will provide resilience. This is not unsurprising as Welsh Government when suggesting collaboration of Trading Standards services, put resilience at the heart of any collaboration. Despite the continued use of the word throughout the document provided, there is absolutely nothing to explain how any of the 5 services involved will be more resilient.	<p>1. Part B - case For Change Para 2 and 3 Refers to resilience;</p> <p>2. Table 19 Non-Financial Benefits, Point 2 describes how a resilient service would be achieved:</p> <ul style="list-style-type: none"> i) Through economies of scale; Combining knowledge and expertise, response activities, service delivery; ii) A larger service which is better able to meet complex (and often global) challenges eg IP crime and tackle, where necessary major organisations; iii) Ensuring achievements of outcomes and statutory requirements when less funding is likely to be available <p>3. Commercial Case Page 4, "The concentration of staffing levels and skills sets will ensure that a regional service has the ability to be resilient, adaptable to change and also have the capability and expertise to deal with complex investigations</p>

3	<p>When collaboration was first mooted, insofar as Greater Gwent was concerned, it was obvious that the level of service provided by some of the constituent authorities was very low due mainly to efficiency savings and a lack of investment in the service. A collaborative service, with adequate resources would in stable economic times undoubtedly provide an enhanced service for these poorly resourced Authorities without severely affecting the service provided by those better performing Authorities.</p>	<p>Some of the authorities have reduced resources as a result of financial pressures, with the result that it has been necessary for them to consider different ways of working. All Local Authorities in Gwent are facing considerable financial pressures and are exploring reductions in service as well as find alternative methods of service delivery that can maximise the use of diminishing resources through new and innovative working practices. The work undertaken through the GTSP has concluded that the delivery of a regional TS service will provide a framework for this and the delivery of an intelligence-led service as recognised by the National Trading Standards Board as the way forward in a the current financial climate.</p>
4	<p>However we are now in an environment where all Local Authorities face severe cuts in relation to their budgets across the board. This not only puts pressure on budgets, but introduces more than a hint of financial uncertainty. Should the collaborative service go ahead, during these troubled financial times, there is every chance that one or more of the constituent Authorities would pull out. Once the collaborative service had been set up, dismantling it, with all the HR ramifications could leave all 5 services in a much weaker position and certainly no better off than they would be if collaboration had not taken place.</p>	<p>If the five authorities all agree to join and create a joint trading standards service this will signify a commitment to the resources and timescales set out in the inter-authority agreement and to making a success of the project. As standard with any collaborative agreement of this type, the legal agreement will however, set out the terms and conditions for a planned exit for 'an authority' should this be required. Even if one of the authorities were to pull out there would still be a concentration of resources that would be large enough to provide a resilient and adaptable service intelligence-led, unlikely to be matched by any service that could be provided by any of the authorities acting independently.</p>
5	<p>it would therefore appear that a collaborative service actually reduces the resilience of each Authority's Trading Standards Service, especially those that currently provide a high level of service.</p>	<p style="text-align: center;">See Previous Comments</p>
6	<p>It would appear that the setting up of a collaborative service would pose significant risks in relation to Service Provision across the 5 Authorities and severe financial risk to the host Authority, in this case Caerphilly CBC.</p>	<p>Service risks exist because of the financial cuts to council budgets. One of the key objectives of developing a regional service is to minimise the service risk, by developing resilience through a concentration of resources that will enable strategic planning across the region and thereby achieve economies of scale and financial savings to offset the challenging cuts to come, while still minimising the risk to service provision. The scrutiny role provided by Caerphilly's Head of Finance in relation to the detail provided in the GTSP Financial Case and the level of contribution to be made by each of the partner authorities is instrumental to managing this area of risk to the authority. The Business Case, Appendix D: Service Specific Risk Appraisal has already identified this as a risk and as such has been considered previously by the board who have acknowledged its importance and will continue to monitor this carefully and manage as appropriate.</p>
<p>Level of Service</p>		

7	The level of Service provided by Caerphilly CBC for its residents and businesses has been of a high standard throughout the life of the Authority, a fact which the members of the workforce are both proud and protective of.	
8	Caerphilly Trading Standards staff are more than aware of the pressures that Caerphilly CBC are under in relation to budgets, and that efficiencies will have to be made, which will put more pressure on the service.	
9	However, the biggest concern is that because some of the services in Greater Gwent are so under resourced, that a collaborative service, if it is to meet the aims of being consistent across the 5 Authorities, will mean the level of service will be far below that currently provided by some Authorities-including Caerphilly, and above that provided by others. This surely will affect adversely residents and businesses within Caerphilly, and the reputation of the Council	It is accepted that service level does vary between Local Authorities in some activities and therefore moving to a single service will result in some changes. However, it is not intended that there would be cross-subsidisation of services, as this would be illegal. It should be remembered that whilst specific services, such as Trading Standards, may experience cuts at different times, all 5 Local Authorities are facing similar budgetary pressures. ID Ref 6: + Protection of reputation has also been identified as a risk and will be managed as such.
10	The business case quotes Trading Standards collaborations that are currently working successfully. However, each of these (West Yorkshire, West Berkshire/Wokingham and Devon/Somerset) were created under totally different circumstances, are different services and did not have to contend with both the diversity in levels of service provision and the severe budgetary pressures together. The success of these collaborations therefore cannot be used as an indicator as to how a Greater Gwent collaboration will work.	The West Yorkshire collaboration was a front-runner in the provision of TS across borders and has existed for some time and was therefore created at a time when the current financial pressures did not apply. West Berkshire/Wokingham and Devon/Somerset, however are more recent collaborations. WB is a small service but still works successfully across boundaries, Devon/Somerset covers a much larger geographical area and the total number of staff are approximately 30% more than that of a regional Gwent service. Whilst no two collaborations will be identical there are similarities to draw upon.
	Working Conditions and how they affect Service delivery	
11	The business case makes great play on the introduction of so called "agile" working, introducing both cost and service delivery efficiencies. An element of flexibility undoubtedly benefits staff and service delivery, and the reduction of fixed workstations for staff will undoubtedly lead to cost savings.	Agile working undoubtedly brings benefits to both service provision, including tangible savings from a reduction in accommodation requirements, efficiencies through the rationalisation of travelling time / costs and also to staff, through the opportunities for flexible working. Agile working has been successfully implemented in many local authorities, including some of the partner authorities for the Gwent Trading Standards project..

12	<p>However, a widely dispersed workforce who cannot interact on a daily basis with managers and peers, introduces service inefficiencies and demotivation of staff, which would likely outweigh any efficiencies both perceived and demonstrable.</p>	<p>The vision for agile working will be translated into a strategy for Agile working which can encompass interaction through a variety of channels including: e-mail, telephone, skype, shared website, defined contact with managers and with further opportunities through the two dedicated trading standards bases situated at Caerphilly and Newport, where it will be possible to access meeting facilities and the administrative support as required.</p> <p>Each member of operational staff will be provided with the necessary equipment such as a tablet, mobile phone etc to maintain contact as necessary with managers and colleagues and to enable access of all systems remotely. It is envisaged that working agilely will minimise unnecessary travelling in terms of both time and cost, releasing these resources to service provision.</p> <p>Opportunities will still exist for team interaction/discussion of issues through regular team meetings.</p> <p>The move towards shared spaces and 'hot desks' represents a more dynamic approach to work, where networks of teams come together to complete specific task-based pieces of work.</p>
13	<p>The environment that Trading Standards work requires constant interaction between team members and managers to solve the regularly occurring complex problems. The concern of staff is that a move towards total "agile" working decreases the effectiveness of the service, makes management of staff far more difficult and leads to staff feeling isolated and dissatisfied .</p>	<p>Managers recognise that in addition to the advantages that mobile working brings, there will also be challenges and some staff may find the transition and the change in working practices difficult. Some of the authorities however, have already successfully introduced agile working and the strategy for the Gwent service will build on the basic principles already established. The project board have agreed to establish a working group to consider agile working and development and to define the role of the 'professional office' within the agile environment.</p>
14	<p>The business case vaguely states that there are benefits of "agile" working, without quantifying them and without considering any of the disadvantages.</p>	<p>See response ID Ref 11,12 & 13</p>

15	<p>Consistency of enforcement: Firstly, though not mentioned at all in the business case, it is understood that the Legal Services Sections of each of the 5 Authorities when considering how to support the collaborative Trading Standards Service, have indicated that each Authority will deal with matters in relation to their own area. This means that any collaborative service will have 5 different ways of dealing with legal breaches across the area. This is not only confusing but could easily lead to conflicting decisions, putting the Service at risk to Legal Challenge and the associated costs.</p>	<p>Consistency of enforcement has been discussed by the project board and the Heads of Legal for each of the five authorities have been consulted with regard to this issue. The Heads of Legal have proposed that each authority will continue to manage their own prosecutions. However, each of the Heads of Legal are also members of a regional shared legal collaboration which is considering ways of working together and standardising working practices. The management of prosecutions will therefore fall within this remit. It is perhaps worth noting that the West Berks/Wokingham collaboration, whilst also adopting the approach of managing their own prosecutions at the outset of the shared service, have as the service matured, reviewed and amended certain working practices. Legal work is one of these and they are now in the process of setting up an in-house legal resource dedicated to supporting trading standards work.</p>
		<p>Food Standards is not currently part of Monmouthshire's Trading Standards service. In common with a number of other Unitary Authorities in Wales, the food standards element of food law delivery is undertaken by Monmouthshire's Environmental Health service through its food safety team. Programmed interventions for Food Standards, as required by the Food Law Code of Practice (Wales) are delivered alongside programmed food hygiene inspections, as required by both the Food Law Code of Practice and the Food Hygiene Ratings (Wales) Act. The vast majority of those interventions are delivered simultaneously with the 600 food hygiene inspections each year. This delivers a model of working that has proved efficient and effective for Monmouthshire for many years. Only a small no (around 30) have risk ratings that require standards inspections at increased frequency to those required for hygiene.</p> <p>Monmouthshire's EH staff meet the competency requirements of the Code of Practice and have extensive experience in delivering the service. The ability to offer food businesses an holistic food law compliance service for both hygiene and standards (along with health and safety at work if appropriate) is an important element of its chargeable services in relation to Primary Authority services and its own ACCESS consultancy programme.</p> <p>From a purely financial perspective, as Food Standards is delivered by MCC EH staff as a small component of a number of people's roles, none would TUPE across. Therefore, if programmed Standards interventions were to be delivered in Monmouthshire by a Gwent Service, additional resource would need to be found by Monmouthshire to purchase this element of the service. That would not be a viable proposition, when competent officers are already undertaking a programmed visit, commissioning from a Gwent service, would not make sense for Monmouthshire from an economic, financial, customer service or better regulation perspective.</p>

16	<p>Consistency of enforcement: Secondly the apparent decision of Monmouthshire to remove the Food Standards enforcement function from scope just for the Monmouthshire area appears to be flying in the face of collaborative service, and again will lead to inconsistencies and confusion for officers.</p>	<p>Purely taking the issue of 'consistency' there is no reason why effective liaison would not continue between Monmouthshire and a Gwent Service. (and the rest of Wales for that matter) and that would be a good thing. However, it is noted that the latest data from the FSA on standards delivery shows that the %age of interventions achieved is much higher in Monmouthshire than the average across Gwent.</p>
	<p>Finance-cost of the service and how it will be funded</p>	
17	<p>The financial case is presented in very broad terms with little or no detail.</p>	<p>Further detail will be provided.</p>
18	<p>Much is made of the savings being made of the savings to be made due to rationalisation of back office/support costs. However there is concern that any of these savings are not savings to the Authority at all, but merely savings to the Service. The amount spent by each Authority on HR, Legal etc will not decrease.</p>	<p>The efficiencies identified are not in relation to central support costs. Any savings made to the service will impact positively on overall savings being made by each of the authorities.</p>
19	<p>The apparent reliance on a sum of money being received each year from the Home Office Proceeds of Crime Incentivisation Scheme. Basing a financial case, even in part, on a sum of money that is not guaranteed at all, would appear to be foolhardy. Incentivisation money, cannot be guaranteed for any financial accounting period and therefore should not be used as part of producing budgets. The reality of the situation is that income from this source will vary between zero and thousands of pounds. There is no way to forecast what income from this source will be in 2015/16, so how can estimated figures be used, bearing in mind the huge variance in income.</p>	<p>The identification of the potential for POCA income in the business case has followed careful consideration by the project board of the positive results by Newport in this area of income generation and a review of the strategy implemented to achieve this, ie through a dedicated staff resource performing a financial investigative function. The level of success and consistency achieved by Newport in generating POCA income over successive years from 2010/11 to the present day led to the Project Board's conclusion that including POCA income generation targets as part of the financial plan was a reasonable assumption. It is acknowledged that the operating model will need to include an appropriately resourced financial investigative function to achieve this. The Project Board are aware however, that definitive figures are not possible for income generation, hence the modest income target which has been included initially in the ongoing calculation for service costs, but which will be closely monitored and amended as appropriate going forward.</p>

20	<p>the proposed structure of a Trading Standards Manager with 3 Managers below managing large teams of on average 15-20 people (taking into account that numbers of people will exceed the number of FTEs) would seem to dictate-although not mentioned in the Business Case-that as these numbers are far too high to be effectively managed, each of the 5 or 6 teams would have a "supervisor" responsible for an amount of the day to day management. This would appear to make the structure top heavy, and leave the 3 identified Managerial posts surplus to requirements, and having introduced a extra tier of management, would prove to be more costly.</p>	<p>A structure has been proposed which reflects a reduction in the number of managerial positions as compared with the status quo. It is recognised that there is likely to be a need for additional leadership roles elsewhere in the structure, but the detail of this has not yet been determined.</p>
21	<p>A far more logical structure would be a leaner flatter one, with 5 or 6 team managers. Without knowing the grades assigned to (or proposed to be assigned to the posts), would, it is expected, be cheaper, although it is not possible to say with any great deal of certainty</p>	<p>A leaner, flatter structure would lack a strategic/operational level that provides 'link' between Gwent TS Manager and the operational roles, with responsibility for monitoring and managing service delivery.</p>
<p>Torfaen CBC Trading Standards Staff</p>		
22	<p>Firstly the concept of a joined up service is of benefit in terms of economies of scale. Ability to work across the whole Gwent will be useful.</p>	
23	<p>At what point will be told what you consider our jobs will be (Roles) etc and where we will be based.</p>	<p>This will be developed in consultation with staff following a decision to proceed with the establishment of a Gwent Trading Standards Service.</p>
24	<p>I am aware that there were some concerns in the past over the finances at caerphilly as a council. Will my pension be protected</p>	<p>Caerphilly Council has a sound financial base and robust financial processes. In relation to pensions all staff will still access the same regional pension scheme no changes to existing provision are proposed.</p>
25	<p>In terms of the Food Standards and Monmouthshire, the overall strengthening the merger is the ability for unity and a strengthening of service. I fail to understand why the concept is being undermined prior to commencement, by the opting out of food standards by Monmouthshire. If anything this totally undermines the whole concept. Also, how Monmouthshire can state at the meeting that " it is not up for negotiation" surely that is what we are doing negotiating a whole joined up, unified, strengthened service.</p> <p>The service should be a complete service in all areas.</p>	<p>See ID Ref 16</p>

26	<p>How will it work if we call ourselves a Gwent service when in fact we are a Gwent service but not totally for food standards. As an example if we are a Gwent service then it will follow that we will be authorised to access businesses in the Gwent area, but, if Monmouthshire have opted out of food standards then the authorisation would not encompass Monmouthshire, this makes administration of this disjointed. Will office powers be restricted to not include Monmouthshire. if we go for the LACORS rating system then possibly one visit could be made for different areas of enforcement but if Food Standards is opted out then two visits will be required to the same premise. The Gwent service paperwork will talk of a Gwent service, but with an opt out for Monmouthshire Food Standards. In all areas of the work we should have a unified position. I therefore strongly request that Monmouthshire be required to come under the one umbrella for all the services in the new service.</p>	<p>Also see ID Ref 16 Authorisations: There are countless examples of a range of agencies working in the same geographical area with different regulatory responsibilities, powers and authorisations. Examples included the HSE, NRW, Police etc. responsibility for programmed food standards interventions in Monmouthshire, along with other food-related service requests, will remain, as now, with Monmouthshire. that should not be confusing. With effective liaison there is no reason why Gwent Trading Standards officers should not be authorised to undertake Food Standards work in the County of Monmouthshire should that assist them in their Gwent-wide roles. Matters pertaining to a wider geographical nature may lend themselves to a regional approach, in relation to which cross authorisation might be useful. There is an expectation that effective liaison between authorities will continue and the establishment of a Gwent service should not undermine that.</p>
	<p>Monmouthshire CBC Trading Standards Staff</p>	
	<p>General - Intro</p>	
	<p>This initial response is to raise concerns held by members of the team, all of which have been agreed and supported.</p> <p>The aim of this response is to use our experiences in Monmouthshire to positively respond to some of the concerns, offer potential alternatives and identify further points for consideration so that any new service is designed in-line with the vision in 1.2 and that content is not placed in the report to tick a box whilst the plans reflect the same old' with different names.</p> <p>Whilst the team acknowledge the level of work required and needed to be undertaken with such a project, it is felt that the draft business case does not provide options for considering both positive and negative aspects of creating a Gwent service have been superceded by the need to make this work and hence is written in a way that emphasises only the potential (not guaranteed) positives.</p>	

27	It must be made clear though that this is just the perception of the team and combined with some of the issues to follow it is strongly felt that this is not the way to begin a service that will 'be recognised as one of the best in the country'!	
28	<p>Any proposal going to the respective cabinets should also include either as part of the business case or in addition to:</p> <p>i) A list of issues that staff have raised and any response, ii) A list of considerations not covered by the business case that should be reflected in a new service <i>Clarification sought with regard to ii) - advised 3 parts to this:</i></p> <p>1. <i>There is not enough detail provided or rather available yet in order to determine some key facts mainly around the financial, HR and structure</i> 2. <i>5 year initial agreement rather than 3.</i> 3. <i>If there is any clause that allows an authority to withdraw then this should ensure that there is some form of staff protection ie staff transfer back</i></p>	<p>1. A summary of the comments generated by the consultation on the business case, together with the replies received, to be attached as an appendix to the Scrutiny reports to be presented to the committees of the 5 authorities. 2. The Project Board acknowledges that a 5 year program would be preferable to a 3 year program, however, it was also recognised that the current financial situation means that this may be impractical. 3. TUPE conditions will apply to any staff transferred.</p>
	Timeframe	
29	One of the biggest concerns is that there is a distinct lack of detail in the report not only from a staff point of view but of more concern for those who do not fully understand the service and will ultimately be making the decision. That is a concern whether supporting the proposal or not.	The service delivered by TS is described in detail in the Strategic Case.
30	Reference to a 3 year arrangement if withdrawal is allowed under 3.9 during this period by any of the 5 LA's, this would also go against one of the main aims of providing a more resilient service and would make it potentially less resilient!	<p>1) See comments in ID Ref 28 ; 2) A withdrawal clause is standard for a this type of arrangement.</p>
31	It is felt that the period agree should be 5 years and if there are any circumstances allowing a LA to withdraw there should be some form of clause with regards to staff transferring back or a penalty charge as it is unlikely that the remaining LA's would be able to cover the cost of retaining that level of workforce	See ID Ref 28
	Reference to Reduced Cost	

32	1.2 refers to reduced cost - whilst it will be provided more efficiently the use of this phrase surely creates the wrong impression, there will be less duplication therefore allowing resource to be focussed elsewhere including areas currently under resourced	It is proposed that the overall cost of the service will reduce over the 3 year period.
Proceeds of Crime Act		
33	POCA is referred to constantly as being an income generation opportunity and used as a key element to the future affordability of the service with no clarity provided as to the restrictions placed on its use.	
34	POCA should only be referred to in the strategic case with full information as to how it can be used and that it cannot be used to fund a service or replace funding from another source but does allow for limited service development.	<p>Noted. Business Case amended to clarify. Use of POCA income:</p> <ol style="list-style-type: none"> 1. Expanding capacity to undertake PUCA work can include: <ol style="list-style-type: none"> a) Training for staff to become accredited FI's b) purchase of specialist software to scan and analyse bank statements c) Temporary additional staff to assist with processing large volumes of research 2. Training officers to undertake complex criminal investigations 3. Maintaining ability to undertake POCA work: <ol style="list-style-type: none"> a) paying for officer accreditation fees b) relevant CPD training to maintain accreditation c) funding specialist counsel to represent confiscation proceedings 4. Part-funding a Prosecutions solicitor in Legal Services to undertake criminal prosecution work to free up officer time 5. Local crime reduction initiatives. This includes payments for target laundering schemes
Operating Model:		
	Whilst there are some questions as to the most appropriate model, there is general support for the lead authority option. It is felt especially with the missing financial data	The evaluation of the options summarised in the economic case, identified both the positive and negative points associated with each of the models. It was concluded after careful consideration, that the lead authority model with a joint committee, offered the greatest potential overall to deliver a regional service, that could produce the required outputs of service resilience, improved efficiencies etc, whilst remaining an acceptable option for the councils and members. As a local authority run service, local government procurement rules will obviously apply. However, the project board are aware of the importance of both IT and legal provision for the service going forward.

35	<p>that determination of the host authority has not yet shown to be the most appropriate or more importantly whilst a host authority is required for employment purposes this should not limit or inhibit the new services ability to select the most beneficial supplier for the various business needs ie IT and legal services provision. if this is not an option then surely the consequences of this have to be highlighted especially when considering some of the claims being stated in the business case.</p>	<p>An IT project working group is being set up, the remit for which will be to review both the existing IT provision and to scope future requirements and to develop an appropriate IT strategy for implementation. Arrangements for legal services provision has been considered with the Heads of Legal Services of the 5 Authourities.</p>
Local Needs:		
36	<p>During the all staff meeting on the 22nd July there were a number of good, important questions raised most of which were unable to be answered satisfactorily but the reasons for this are understood and it is hoped that they will be answered in good time. One of the concerns was from a Caerphilly perspective and the potential loss of service to Caerphilly taxpayers, equally though that is felt in other areas including ourselves especially as Monmouthshire is clearly perceived as being affluent in comparison to the other areas and resources would be diverted away from needs here. Over time we are sure the position of the professional staff that we have would be that they serve the people of Gwent rather than the current LA they work for now but the important point is that any service delivery models/priorities acknowledge all needs and not necessarily those that the better resourced services deliver now.</p>	
Structure:		
37	<p>The detail around structure is considerably deficient for anyone making a decision on such a proposal. Explanations around the proposal do not address concerns regarding future service provision or how and where staff may 'fit' in. It is very much a historic, old fashioned, traditional hierarchical structure that doesn't acknowledge changes in service delivery through the intelligence operating model or that of a modern agile service which does not fit in with the statements made in 3.4</p>	<p>The options for a staffing structure are generally either hierachical or flat. The avoidance of unnecessary managerial layers within the structure has been aa consideration for teh Project Board. It has been concluded that the proposed approach addresses the desire to deliver an intelligence-led service, including for example, a layer of staff who provide the link between strategic policy-making and operational delivery, ensuring co-ordination and cohesion of an 'agilely' delivered service across a broad geographical region. (Also see ID Ref 21)</p>

38	<p>More meaningful engagement is carried out with all staff so that suggestions can be put forward and considered. Golden opportunity to create something new and surely examples from other organisations (not just other TS collaborations but across the world) should be sought as part of this process</p>	<p>Engagement with staff will be an ongoing element of the development of the service both pre and post implementation.</p>
39	<p>Once a proposed structure has been agreed, staff should be given very opportunity to apply/state their preference and that no slotting in should take place unless there is a lack of particular skills, knowledge or experience. Where there is more interest than posts then all staff interested should be given the opportunity to apply and state their case through a fair and equal process</p>	<p>The recruitment process will be agreed by all five authorities and staff will be advised of this process in due course. It is intended that the agreed process will be transparent and will be carried out equitably and fairly and that no member of staff will be disadvantaged as a result. Primarily it is likely that the roles will be ring-fenced and staff identified who it is felt, are regarded as a potential match based on pre-agreed criteria.</p>
Food Standards:		
40	<p>is concern around the food standards position, as this is the only aspect within the proposed scope that is restricted and certainly does not align with many of the claims and statements made about the reasons for the proposed new service including consistency and resilience. This is a decision that needs to be made by the authority at the appropriate level to do so and should form part of the report put to members. At this moment this skew's the figures in a number of the tables and for comparative purposes those tables should separate food standards information from that of the wider service.</p>	<p>See Ref ID 16</p>
Blaenau Gwent CBC Trading Standards Staff		
41	<p>Why two bases - wouldn't one make more sense with people working agilely anyway. Two bases could get confusing as to what is the base/address etc. of the service</p>	<p>As will be noted, accommodation proposals reflect the 2 main existing concentrations of staff. Accessing new accommodation is likely to result in additional cost.</p>
42	<p>Why Newport for a base - it seems very skewed geographically and has little in the way of free parking for staff. Wouldn't it make more sense to have a more central single base in the County where parking is free and available? (Cwmbran was suggested) This would keep costs and travelling time down for any times that officers had to attend the base rather than be dragging some officers the entire length of the County to get to the Newport base.</p>	<p>As above. It is envisaged that hot desking will be available across the region as part of the agile working strategy.</p>

Unison

ID	Comments Received 13th Aug 14	Response
1	Unison is broadly in favour of the initiative as being in line with its policy of supporting collaboration projects as a means of achieving efficiency savings as an alternative to cutting services / jobs or outsourcing	
2	Unison fully supports the preferred option set out in para 2.8 of the Economic Case. It should be noted that Unison would wish to revisit its stance should the council propose to support other of the initial shortlisted options.	
3	Unison fully supports the conclusion in para 2.5.3 of the Economic Case which commits to in house provision. It should be noted that Unison would wish to revisit its stance should the Councils propose to support other than the short-listed options.	
4	If Unison needs to revisit its stance in respect of the above 2 bullet points it would wish to challenge some of the statement in para 2.4.3 of the economic case which it believes to be inaccurate in the context of TUPE and the Welsh Assembly code in relation to the two tier workforce.	
5	Para 3.5 Commercial Case It is recognised that the consultation has taken place with Unison however we have recorded our concerns that there appears insufficient impetus to:	
	i) Identify all staff in scope for any TUPE transfer, particularly in respect of support staff	Completed
	ii) Undertake an audit of existing pay and grading and terms and conditions of service.	Ongoing
	iii) Detail a view in respect of the ongoing Total Rewards review in Newport Council	Newport is currently undergoing a single status and job evaluation process. This is expected to be concluded during 2015 and any implications will be addressed at that time.
	iv) Establish a HR work-stream group, with Unison representation, to oversee the process of negotiation/consultation including around the issues detailed above.	Agreed. 1st meeting took place Sept 14.
6	Para 3.8 Commercial Case: Unison is strongly of the view that any initial contract period should be for 5 years to provide the appropriate degree of certainty for both the service and staff	
7	Para 3.10 Commercial Case: This para fails to reflect or address the concerns expressed by Unison about how the existing councils or the new host council will address the TUPE implications surrounding staff who currently only spend a limited amount of their time engaged in activities relating to the Trading Standards functions - primarily support staff	
8	Para 5.2.1 Management Case: Unison is strongly of the view that there should be a TU representative on any management board to be established. If the preferred option of a joint committee is adopted then there should be provision built in for a trade union representative to attend and make submissions to any Joint Committee	It is proposed that there will be a single member representative from each LA on the Joint Committee. The request for TU attendance will be considered when drafting the Terms of Reference.
9	Para 5.2.1 Management Case: There would need to be consultation with Unison/TU's over any process to fill the 4 senior posts and there would need to be agreement with the recognised Tu's over any recruitment procedures for staff within the operational teams	Consultation with staff and their relevant representatives will be part of the process.
10	Para 5.4 Management Case: Unison notes the timetable set out for approval by the respective councils and accepts that it is clearly appropriate for them to do so in line with their respective established procedures. Equally, however, it wishes to restate its concern that leaving the establishment of the proposed work-streams, specifically the HR work-stream is short sighted and has the potential ultimately delay implementation, as there is likely to be insufficient time to conclude negotiations around a number of the areas referred to in this submission.	See Pt 5 ii) & Pt 5 iv)
11	Appendix E: Although alluded to earlier in this submission, and stated unequivocally in previous discussions/correspondence, Unison would be vigorously opposed to any proposal to establish an SPV or Limited Company and would, under such circumstances, wish to review its stance in support of the initiative.	

Businesses & Residents (Website Consultation)

ID	Business (If applicable)	Authority of Residence	Comments on Proposal	Response
1	Get Connected	Monmouthshire	I think it is a great idea and would be easier than dealing with different offices.	
2	International Greetings	Caerphilly	I am concerned that the TSD will become 'too big' and the service in particular the relationship will be affected. The current smaller set up has local knowledge and a strong business relationship built and maintained. I feel that this enable focus of the business and this excels where changes or issues arise.	
3	Blaengwaeny Farm, Halletts Real Cider	Caerphilly	We have a good relationship with our Caerphilly Trading Standards Officer and would hope we would continue to do so in a unified service.	
4	A G Barr	Blaenau Gwent	<p>i) I think this will dilute the relationships we have as a business with the TSO. It will mean a variety of people visiting with no previous knowledge of the site leading to longer sessions and repeating of data and explanations that have already been made.</p> <p>ii) When trying to make contact it will result in being unable to talk to the staff we know. This will not only take us extra time to explain the situation but also waste the TSO's time as they will have to research us before being able to answer our queries.</p>	

iii) With people covering a larger geographical area travel time will increase for the TSO's I believe and active work time will reduce negating some of the benefits of sharing the load.

iv) If we look at the NHS if you are in hospital you will have a named nurse as first point of contact - will this be the case with the TSO or will it be the next one on the rank who picks up a problem, I value the relationship I have with the current incumbent there is a level of trust on both sides which would be hard to replicate.

5

Monmouthshire

i) Clearly potential benefits but similarly potential for loss of service in some areas. Future service should be created on a modern needs basis and be fully transparent in its reasoning.

ii) Consultation needs to be more meaningful questionnaire should have more detailed answers and access to relevant information in order to make an informed response.

iii) Wider variety of consultation including roadshows and events that can be attended by both consumers and business alike.

6 Tudor Brewery Blaenau Gwent

I can understand why the streamlining of services will be beneficial in the reduction of costs but I do have my concerns over the logistical viability of this proposal.

If I am correct in my assumptions all services relating to Trading Standards will be amalgamated into one unit based at a specific location. The main issues I with this:

a) At present we have a strong working relationship with our Trading Standards officers. How will this be maintained going forward? Having someone who is aware of the local area and the business we do has been very helpful over the past two years of trading and advice given has been invaluable. What reassurances can be given to ensure that this level of contact continuity and commitment will be maintained?

b) Will this 'super cell' have the staffing capacity to effectively manage an area as large as the one proposed?

c) Will jobs be lost through this restructure?

d) What benefits will be seen through the merging of service areas and how will this be effectively measured going forward?

7

Newport

I can't see how I or anyone else can answer this question without seeing the proposals.

I worked in Trading Standards for over 40 years before retirement working for authorities across South Wales as well as participating in governance of consumer affairs across the uk. It is fair therefore to point out therefore that my views and responses may be more than the average consumer.

I have only read about the broad simple proposal of combining the current five council TS services in Gwent into one Regional one covering the same area. I have seen no detail of staffing or resources or of organisational managerial or reporting structures. It is therefore very difficult if not impossible for anyone to give an informed view on the idea.

I can only therefore give broad views on the assumption that resources and staffing levels are provided at a level that make a regional service efficient and effective and capable of investigating and bringing to task both local scams and rogue traders as well as large and international companies and organisations.

I fear that is not currently the case which has led to a gradual but regretful fall in standards in many of our High Street retail establishments and in corporate service standards across the financial and commercial services sector. Not least on the internet.

Any proposals should not just be about saving money or sustaining or safeguarding existing services for in many areas these appear to be failing as national standards drop. No they should be about organisational and service delivery changes that efficiently utilise existing resources into a service that can swiftly and effectively deal with the everyday concerns of the public (consumers) of Gwent.

On the general principle of 'is bigger better' I worked for both Gwent County Council when the Trading Standards service were at that County level. Both were successful Trading Standards authorities that could hold their own with large Corporates and had national recognition. Both were well resourced and supported elected members who recognise the invaluable work carried out by the service in protecting their constituents. both were well managed and organised constantly seeking and embracing new methodologies and ideas.

On the break-up of the two County Councils in many local authorities the Trading Standards were absorbed by larger Departments and allowed to wither. To the credit of Caerphilly CBC this never happened and they continued to be a first class example of a small but effective service. So if a lead authority is required for this service in Gwent it can only really be CCBC.

I would very much like to see the detailed plans for an all Gwent service and have the opportunity to comment on resources and organisational issues if that is possible.

Public Bodies

Public Body	Contact	Address	Letter Sent	Replied Rec'd	Comments
BRDO	Graham Russell	Lowere ground floor, Victoria Square House, Victoria Square, Birmingham. B2 4AJ	23/05/2014	25/06/2014	BRDO\BRDO Response.doc
FSA Wales	Nina Purcell	11th Floor, Southgate House, Wood Street, Cardiff. CF10 1EW	23/05/2014		
Aneurin Bevan HB	Gillian Richardson	Victoria House, 2nd Floor, 136-140 Corporation Rd, Newport, NP10 0BH	23/05/2014	25/06/2014	Full support of the proposal confirmed
Gwent Police	Jeff Farah	Gwent Police Headquarters, Croescyceiliog, Cwmbran. NP44 2XJ	23/05/2014		
H&S Exec	Jane Layssey	Government Buildings, Phase 1, Ty Glas, Llanishen, Cardiff. Cf14 5SH	23/05/2014		
HMRC					
AHVLA (Animal Health Vets in WG)	Martin Sharples, Wales Operations Director	South Wales Animal Health Regional Office, Ty Melin, Heol Glasdwr, Parc Pensarn, Carmarthen, SA13 2NF	03/06/2014	30/0514	Holding reply only received
FACT (Federation against copyright theft)	Eddy Leviten, Director of Communications)	Regal House, 70 London Rd, Twickenham, Middlesex. TW1 3QS	03/06/2014		
CAB/CACs					
NTSB		1 Sylvan Court, Sylvan Way, Southfields Business park, Basildon, Essex. SS15 6TH			
ACTSO		1 Sylvan Court, Sylvan Way, Southfields Business park, Basildon, Essex. SS15 6TH	23/05/2014	03/06/2014	ACTSO does not comment on specific proposals relating to the arrangements which Local Authorities choose to deliver their services.
BPI (British Phonographic Society)		Riverside Building, County hall, Westminster Bridge Rd, London SE1 7JA	03/06/2014		
IPO (Intellectual Property Office)		Concept House, Cardiff Road, Newport, S. Wales. NP10 8QQ	03/06/2014		
ACG (Anti-counterfeiting Group)		PO Box 578, High Wycombe, Buckinghamshire, HP11 1YD	03/06/2014		
South Wales Fire & Rescue	Hugh Jakeway	Forest View Business park, Llantrisant, CF72 8LX	23/05/2014		
TSI	Leon Livermoor	1 Sylvan Court, Sylvan Way, Southfields Business park, Basildon, Essex. SS15 6TH	23/05/2014		
LA Home Authority and Primary Authority Companies	See separate List				