



Report of the Cabinet Member for Environment Services

Cabinet - 19 October 2017

Public Protection Commissioning Review Option Appraisal Report

Purpose:	This report outlines the background to the Public Protection Commissioning Review and sets out the key findings and recommendations.
Policy Framework:	Sustainable Swansea – Fit for the Future
Consultation:	Legal, Finance and Cabinet Member.
Recommendation(s):	It is recommended that: 1) The key findings of the review are accepted and proposals on the Commercial opportunities are approved for implementation subject to cabinet approval.
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1 Summary

- 1.1 This report is to seek approval to proceed with the recommended proposals on the commercial opportunities identified and to provide evidence that the review has completed all relevant tasks as part of the commissioning process.
- 1.2 This report will also address an overview of the review findings to date.

2 Background

- 2.1 This report has been produced following the approval by Budget Performance Review Group (BPRG) at Gateway 1 to proceed onto Stages 3&4 of the Commissioning Review process. Its purpose is to inform Cabinet of progress and to seek support on the approach and recommendations to deliver the service improvements.

3.0 The Review So Far

3.1 Scope

The scope of services to be included within the Public Protection Services Commissioning review was set out in Stage 2 of the process and consisted of:-

- Building Control
- Pollution and Pest Control
- Housing and Public Health
- Licensing/Food and Safety
- Trading Standards/Health Promotion
- Registration and Bereavement Services

3.2 Outcomes

The future outcomes identified and approved at Stage 2 consist of the following:-

The overall priorities of the Public Protection service are '*To protect and promote the health, well-being, safety and consumer interests of people living in, working in or visiting the City and County of Swansea and to improve the condition of private sector housing*'.

The headline outcomes identified are as follows:

- To protect and safeguard the public especially vulnerable people.
- For people to feel safe and confident going about their business.
- To have good and successful businesses in an environment of fair trading which supports the local economy.
- To contribute to Swansea being a Healthy and Safe city.

In addition, a number of more general outcomes were identified which underpin the headline outcomes and are as follows:

- To meet legislative requirements.
- To provide reassurance to concerns from both internal and external customers.
- To maintain key partnerships by closely working with other services within the Council and external organisations.
- To generate income to support the aims of the service.
- To undertake an enabling role and help educate others.

3.3 Key Issues identified at Stage 2

The key issues identified at Stage 2 of the review were as follows:-

- The extensive range of services provided by Public Protection make a significant contribution to the Corporate priorities of safeguarding vulnerable people, creating a vibrant and viable city and economy, building sustainable communities and tackling poverty. (Recently updated to:- Safeguarding people from harm, Improving Education and Skills, Transforming our Economy and Infrastructure, Tackling Poverty and Transformation and Future Council Development.)
- They also contribute to the wider national and local agenda of health, well-being, public service improvement and play an important direct and indirect preventative role. For example priorities on improving housing quality and management standards in the private rented sector, helping to prevent and reduce public health issues such as smoking cessation, underage drinking, infectious disease outbreaks, reducing health inequalities; improving safety in communities and living within environmental limits and acting on climate change.
- Most of the services are frontline and getting things wrong could have an impact on the Council financially and on its reputation but most importantly on the residents of Swansea.
- 61.5% of the total expenditure of Public Protection is realised via income and there maybe scope to increase this further.
- In areas of Building Control and Licensing where legislation requires fees to be set to recover costs of providing the service, any reduction in costs e.g. loss of staff will impact on the level of future fees charged/income or could result in legal challenge.
- Whilst the majority of activities are statutory, there may be some options to stop delivering discretionary services and or reconfigure how the statutory ones are delivered.
- There are few examples of Public Protection services being fundamentally changed elsewhere and limited examples of alternative models/providers.
- There is a need to invest to save and provide greater service efficiencies. Improvements in IT need to be explored with the IT service.

3.4 Key Risks identified during review

The key risks highlighted during the review are as follows:

- Ability to respond to pandemics/national disaster/local emergencies and getting things wrong could have an impact on the Council financially and on its reputation.
- Preventative and discretionary services are at risk, e.g. health promotion work.
- There are a distinct and significant number of specialisms across the services for which officers have to maintain their Continual Professional Development etc and any potential reduction of staff would have a significant impact on services/loss of expertise.

- Increased demands and reducing resources is impacting on workload management and customer response is becoming much more reactive than proactive.
- WAO report acknowledged concerns for how local authorities will be able to respond to any new environmental health statutory duties and national strategic priorities in light of budget reductions and on top of recent major legislative changes.
- Increasing expectations from the public and Welsh Government.

3.5 Feedback/Steer from Gateway Review Panel - Stage 2

3.5.1 The Gateway Review Panel considered a number of issues requiring a steer prior to work commencing on Stages 3 and 4 including;

- Confirmation that the service outcomes are adequately defined.
- Opportunities to stop some services we are not obliged to provide at the current levels.
- Whether the service should seek further discussions with neighbouring authorities on opportunities for collaboration.
- Whether work on changing the overall organisational structure, with cost efficiencies, should be pursued.
- Opportunities to pursue commercial activities in particular around advice to new businesses, etc.

3.5.2 The Gateway Review Panel concluded that the outcomes were adequately defined and that in terms of the future direction and work to be undertaken for stages 3 and 4 of the review, it was recognised that the majority of services provided fulfil a statutory role and that there are limited opportunities to radically change the way they are provided.

3.5.3 However, the Panel further concluded that the service should;

- Continue to explore commercial opportunities to increase income.
- Approach neighbouring Councils about any future opportunities for collaboration.

3.5.4 In addition it was recognised that IT development would further assist service efficiencies and work should continue with colleagues from Corporate IT to identify what and how any improvements could be implemented.

4.0 Stage 3 - Service Review

4.1 Service Review Scope

4.1.1 The service is made up of many diverse functions which are summarised in the following table. The review examined:

- What functions are delivered and how they are resourced;
- Good practice and achievements;
- Customer demand, feedback and complaints information.

4.2 What functions are delivered and how they are resourced

<p>Building Control</p> <p>The Building Control team ensures that buildings are healthy, safe, sustainable and accessible for all users and tenants whether domestic, commercial or public service.</p> <p>The team are responsible for Building Regulation applications, inspections and enforcement, administration of the Approved Inspector regulations (Private Sector Building Control), inspection and certification of sports grounds, dealing with dangerous structures and buildings, securing open premises (unauthorised access) and dealing with dilapidated buildings and demolitions.</p> <p>There are 12 FTE's.</p>	<p>Pollution and Pest Control</p> <p>The Pollution team are responsible for a wide range of pollution issues including noise control, air pollution, industrial emissions and contaminated land. The team works closely with other agencies and enforcement bodies such as Natural Resources Wales. The team also operates a 24hr service that responds to various emergencies and registered noise nuisance problems.</p> <p>The Pest and animal control team functions are carried out by a team of pest control officers who routinely investigate and treat for a wide range of pests including rats, mice, wasps etc in order to safeguard public health. The animal wardens undertake the control and collection of stray dogs, collection of dead animals from highways/ beaches and impounding of stray horses.</p> <p>There are 17.9 FTE's.</p>
<p>Licensing/Food & Safety (This section is split into 2 teams)</p> <p>The Licensing team is responsible for administering and authorising licence and permit applications including licences for the sale and supply of alcohol, entertainment, gambling and sex establishments, hackney carriage, private hire vehicles and drivers and permits for charitable collections and fund raising.</p> <p>The Food and Safety team carry out statutory enforcement work to protect public health in 3 main areas, i.e. food safety, health and safety and infectious disease.</p> <p>There are 26.79 FTE's.</p>	<p>Housing and Public Health (This section is split into 2 teams)</p> <p>The Housing team oversee the improvement and maintenance of standards in the private rented sector with a large proportion of the workload relating to HMOs. They also monitor private housing and residential caravan sites.</p> <p>The Public Health Team investigates complaints relating to defective private drainage matters through enforcement and statutory nuisance investigations including some waste issues, high hedges, dangerous trees.</p> <p>There are 15.58 FTE's.</p>
<p>Registration and bereavement (This section is split into 2 teams)</p> <p>The Registration team are responsible for the establishment of a permanent, legal record of every birth, death, marriage and civil partnership in the City and County of Swansea, Citizenship ceremonies.</p> <p>The Cemeteries and Crematorium team provides a burial service for new and existing graves in the seven operational cemeteries and cremations at Swansea crematorium together with memorialisation and remembrance. Work also includes grounds maintenance and operation of cemetery and cremation buildings.</p>	<p>Trading Standards</p> <p>The Trading standards team provides assistance to consumers and businesses through the enforcement of consumer protection legislation. They are responsible for raising awareness of scams to protect consumers and older people to maintain an independent lifestyle, street trading functions, regulating the sale of age restricted products, taking action against cheap tobacco suppliers, working in partnership to reduce the impact of stray and abandoned horses, implementing disease control measures at agricultural premises consistent with Animal Health Act 1985 and investigating unfair competition</p>

There are 24.85 FTE's.	resulting from rogue trading practices and negligent call centres.
	There are 20.5 FTE's.

4.3 Good Practice and achievements

4.3.1 Over the years, improvements have been introduced in a number of the services which were recognised as good practice by the Wales Audit Office in March 2015. Full details of the services' achievements were cited in the Gateway 1 report in October 2016 and examples include the Council's approach to encouraging the re-use of empty homes, the woodland burial service and the SPICE IT system for capturing historical data.

4.4 Customer demand, feedback and complaints information

4.4.1 The Gateway 1 report highlighted the high volume of customer demands on the service during 2016 which included around 10,000 requests for pest and pollution control, 3,500 premises inspections by Trading Standards, 11,500 service requests to Building Control, 7,000 births and deaths registered and over 5,000 service requests made to Housing, and Public Health. Around 3,500 requests were received relating to food businesses and health and safety, and over 6,000 requests for Licensing services.

4.4.2 Whilst Public Protection services experience high volumes of customer demand, the overall number of complaints remain low with a total of 30 complaints in 2015/16 and of these, only 5 were identified as justified and 1 part justified. There were fewer complaints in 2016/17, i.e. total number 13, 9 not justified, 3 partly justified and 1 no response required.

4.4.3 In terms of specific customer feedback, the majority of services within the scope of this review do not routinely measure customer satisfaction and for some, it is difficult to capture meaningful data due to the nature of the service and who the customers are (i.e. private sector landlords subject to enforcement work, businesses subject to prosecutions, rogue traders etc.) However where regular consultation does take place, the results are positive, as captured in the Gateway 1 report. Further work will be undertaken to routinely capture qualitative data utilising IT solutions to avoid diverting resources away from frontline service delivery.

4.5 Stakeholder consultation

4.5.1 Two workshops were held as part of this review which were attended by a cross section of Public Protection stakeholders including the Cabinet Members for Transformation / Performance and Wellbeing / Healthy City, trade union representatives and staff (both at manager and officer level). The Stage 1 workshop was held in July 2016 to capture and define the headline outcomes across the service in terms of why we do what we do and where the service supports corporate priorities. The workshop also carried out a SWOT analysis, identifying strengths, weaknesses, opportunities and threats for each

service area. The Stage 2 workshop in December considered opportunities for increasing income and IT/service delivery improvements.

- 4.5.2 Feedback from all staff was sought via the Monthly team briefings and the Head of Service met with the respective Cabinet Members to discuss the progress of the review.
- 4.5.3 In addition senior managers in the service have close working relationships with national/local authority network groups and have consulted colleagues from other local authorities on the outcomes of any initiatives that they have implemented in their services and any other commercial practices.
- 4.5.4 As already mentioned, direct stakeholder engagement with customers can be difficult due to the statutory and diverse nature of many of the services particularly those that involve regulation/enforcement activities etc. However, the services have a good track record and reputation for successful partnership working and regular engagement with other agencies such as the Police, Natural Resources Wales and the Fire Brigade, and with Funeral Directors and other local businesses.
- 4.5.5 Further stakeholder consultation will take place as part of taking forward the income generating proposals detailed in section 7.

5.0 Stage 3 – Service Comparison

5.1 Benchmarking data

- 5.1.1 As highlighted in the Gateway 1 report, any assessment of value for money and detailed comparisons of costs between authorities is difficult as the availability of benchmarking data is very limited. This is further compounded by the fact that each local authority provides the service in different ways, structures its service differently or splits up the various functions in different ways. Also, no two authorities are the same in terms of the costs to be recovered, therefore any budget comparisons can be open to misinterpretation.
- 5.1.2 However, where it is available, data to compare the current service and performance with others is detailed in the following sections 5.2 to 5.5.

5.2 How services are provided elsewhere

- 5.2.1 The 14/15 WAO report highlighted that 19 out of 22 Welsh councils had made some changes to services but that nothing fundamental had been introduced. However, since then Bridgend, Cardiff and Vale of Glamorgan Councils have set up an integrated service operating under a single management structure for the Trading Standards, Environmental Health and Licensing functions. This was funded via the Welsh Government's Regional Collaboration Fund.
- 5.2.2 Research was also undertaken via the WLGA in 2015 to explore whether any other Public Protection services have been outsourced to the private sector or

provided via alternative service delivery options. However there are very few examples of where this has taken place. See Appendix A for further details.

5.2.3 Discussions took place with Neath & Port Talbot Council some years ago on opportunities for collaboration but this was not progressed. However, the Stage 2 Gateway panel suggested that further approaches are made to neighbouring Councils and as a result, the Director of Place has formally written to respective counterparts in both Authorities. However in the meantime, the Welsh Government White Paper 'Reforming Local Government: Resilient and Renewed' has been published and early contact has suggested that any discussions on collaboration at a service or functional level will need to take into account any formal arrangements between authorities that may emerge as a result. Therefore it is proposed that this is kept under review and further collaborative opportunities are followed up at the appropriate time.

5.3 Performance

5.3.1 The findings of the Wales Audit Office report 2014/2015 'Delivering for less' identified that Swansea is delivering 47.5% of environmental health services to the highest best practice standards compared to an all Wales average of 37% as judged against the Chartered Institute of Environmental Health Wales Best Practice Standards (BPS). The Best Practice Standards cover the majority of services within this review but do not cover Building Control, Bereavement and Registrations.

5.3.2 Every year the Public Protection service is subject to inspection for the purpose of re-certification of the Quality Management Standard (ISO 9001:2008). The most recent audit was carried out in July 2017 when they reviewed a sample of services and Public Protection was assessed as compliant.

5.3.3 The Council delivers the Public Protection service in line with quality standards as detailed above, specific legislation, guidance and regulations. As well as annual audits and reports, business plan and internal reporting systems, Public Protection has two national indicators which it reports progress on to the Welsh Government for comparison with other local authorities on an annual basis. The indicators relate to the percentage of food establishments which are "broadly compliant" with food hygiene standards and the percentage of private sector dwellings that have been vacant for more than 6 months at 1st April that were returned to occupation during the year through direct action by the local authority. Performance for both was in the top quartile of all Welsh local authorities for 2015/16 (National comparative data for 16/17 is not published until Autumn 2017). See Appendix B for further detail on the results of national and local PIs for 16/17.

5.4 How services compare with other LA's

5.4.1 It is clear from the comparison research undertaken for the commissioning review that no two councils are alike, most Public Protection sections have different portfolios and their functions are structured differently.

5.5 Review of comparator fees

5.5.1 The table below summarises the cost recovery in relation to each service and where possible, compares these fees with others. However the majority of fees are determined in accordance with legislation and the All Wales Expert Panel Fee toolkit and therefore not automatically subject to annual increases. The only fee increases already included in the 17/18 budget are for a 5% increase in burial/cremation fees and charges for the wedding venue facility at the Civic centre. This was a 3 year proposal and 17/18 is the final year of implementation.

Registrations	<p>Cost recovery Full cost recovery is being achieved.</p> <p>Fee comparison The fees for wedding ceremonies and associated services are more varied with authorities offering a range of services making it difficult to make an accurate comparison. The only reliable comparator currently available is for wedding ceremonies where Swansea's costs for a typical Saturday wedding at a licensed venue is £370 against a Welsh range of £280 to £499.</p>
Bereavement	<p>Cost recovery Full cost recovery is being achieved.</p> <p>Fee comparison The fee structure for new graves and cremations is variable across South Wales Authorities. Burial fees range from £1265 to £2344, with Swansea's fees at £1625. Cremation costs range from £421 to £671, with Swansea's fees at £610.</p>
Building Control	<p>Cost recovery Full cost recovery is being achieved.</p> <p>Fee comparison Since the introduction of the Building (local Authority Charges) regulations 2010 each authority legally has to set their own fees with a view to recover the costs involved in delivering their service. Therefore each authority's fees reflect their own costs. Swansea's costs are fully recovered and it currently commands 80% of the local market.</p>
Housing & Public Health	<p>Cost recovery HMO licence fees are set on a cost-recovery basis. (In addition the provision of the HMO advisory service for owners and prospective purchasers of potential HMOs is dependent on demand and in 2016/17 there were 38 requests = £12,450 income).</p> <p>Fee comparison The fees were last reviewed for the start of 2016-2017 financial year and are charged in accordance with the All Wales Expert Panel Fee toolkit.</p>
Licensing	<p>Cost recovery Full cost recovery is being achieved in accordance with legislation.</p> <p>Fee comparison The locally set fees are charged on a cost recovery basis in accordance with the All Wales Expert Panel Fee toolkit.</p>

Pollution	<p>Cost recovery Fees for pollution control are determined in accordance with legislation.</p> <p>Fee comparison Fees charged for Environmental Permitting (England & Wales) Regulations 2016 are consistent with other local authorities because they are set by the Welsh Government.</p>																		
Pest Control	<p>Cost recovery Cost recovery for pest control is achieved for all those services where a full charge is levied.</p> <p>Fee comparison Fees are comparable with other LAs and are either at or above the median level as follows;</p> <table border="1" data-bbox="464 651 1099 875"> <thead> <tr> <th>Treatment type</th> <th>Swansea's fees</th> <th>LA median value</th> </tr> </thead> <tbody> <tr> <td>Beetles</td> <td>£62</td> <td>£60</td> </tr> <tr> <td>Fleas</td> <td>£62</td> <td>£46</td> </tr> <tr> <td>Flies</td> <td>£62</td> <td>£60</td> </tr> <tr> <td>Mice</td> <td>£62</td> <td>£40</td> </tr> <tr> <td>Wasps</td> <td>£62</td> <td>£46</td> </tr> </tbody> </table>	Treatment type	Swansea's fees	LA median value	Beetles	£62	£60	Fleas	£62	£46	Flies	£62	£60	Mice	£62	£40	Wasps	£62	£46
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Trading Standards & Health Promotion	<p>Cost recovery Fees are either set by regulations or are calculated on a cost recovery basis and are consistent with fees charged by other Councils for the same service.</p> <p>Fee comparison</p> <ul style="list-style-type: none"> • Fees charged by Trading Standards for metrology services are consistent with other local authorities because they are set by a collaborative professional group. • Licence fees for issuing petroleum and explosives storage licences are set by national regulation. • Fees for scrap metal operators and street trading consents are calculated on a cost recovery model and are consistent with other local authorities in Wales because they are set by a collaborative professional group. 																		
Food safety	<p>No charge for majority of services however fees are recoverable for food businesses who request Food Hygiene rating scheme rescore and these are set on an All Wales basis.</p>																		

5.6 Financial

5.6.1 The last few years have been challenging for the service with reductions in budget and staffing. Service savings of £1.26M have been achieved between the base budget of 2014/15 and 2016/17. In addition, a further £208K of savings has been identified for 2017/18.

5.6.2 The breakdown of savings from 14/15 to 17/18 is as follows:

£550K	Increased income generation
£673K	Service savings
£245K	Senior management review
£1.468M	Total

61.5% of the total expenditure by Public Protection services is realised via income.

Total expenditure across Public Protection was £7m for 16/17.

A number of services generated income which totalled £4.3m.

Total net budget for 2016/17 was £2.7m

5.7 Conclusion

5.7.1 The conclusion which can be derived from this data is that the Authority provides cost effective, high performing Public Protection Services.

6.0 Stage 4 – Service Delivery Improvements

6.1 As part of the review process a workshop was held with staff, Members and trade union representatives on 7th December 2016 to consider the outcomes from the Gateway Review Panel and to identify further service delivery improvements. The Panel had suggested the service focus on exploring commercial opportunities to increase income and IT development to further assist service efficiencies.

7.0 Opportunities

7.1 Commercial Opportunities

7.1.1 During Stage 2 of the review, research and dialogue took place with the Corporate commercial team and a number of local authorities on opportunities around charging for advice and additional services. The emerging opportunities were then presented to the workshop which generally supported that the following income generating ideas should be explored further.

Opportunity	Potential risk	Key findings so far/what next?
Provision of E-learning training for taxi drivers (Licensing)	Impact on delivery of statutory services	Work ongoing to develop the System further to enable taxi drivers to complete the test electronically. Work is currently being undertaken with the commercial team to develop a more detailed business case to analyse potential demand, potential income, risks and resources, in particular IT requirements, required to effectively implement the proposal.

<p>Provision of advice for new and existing businesses. (Food Safety)</p>	<p>Impact on delivery of statutory services</p>	<p>Work is currently ongoing to :</p> <ul style="list-style-type: none"> • Identify current levels of demand / workload and methods of customer contact. • Map existing processes. • Explore opportunities/create efficiencies. • Detail business processes currently in use. • Explore processes and priorities in carrying out 100% of high risk inspections. <p>A “systems thinking” approach is being used to ensure that the team are making the best use of resources, including the potential for increasing customer use of web based information, identifying the most appropriate officers to deal with service requests and to identify the level of new business advice that could be charged for.</p>
<p>Provision of training to raise business awareness related to new and existing regulations designed to assist compliance (Trading Standards)</p>	<p>Impact on delivery of statutory services</p>	<p>Work is being undertaken to map processes in order to develop efficiencies and also identify demand for trade seminars/market test if businesses will attend the seminars for which they have to pay.</p> <p>A review of service requests related to new business advice is being undertaken using a “systems thinking approach” in order to ensure that we are;</p> <ul style="list-style-type: none"> • Making the best use of technology to direct business operators to advice and information they can source for themselves. • Using an appropriate Officer to deal with service requests at this stage. • Providing information applicable to all free of charge to ensure that we are in a position to charge for more detailed bespoke advice for specific businesses. <p>This work will help determine if this approach will achieve;</p>

		<ul style="list-style-type: none"> • Improved regulatory compliance through better understanding of their responsibilities. • Assessment of whether the business community will attend and pay for sessions of this nature. <p>If a business case identifies income is recoverable then implementation could proceed by the end of 2017.</p>
<p>Provide trading pitches at identified locations which can be rented and for which a street trading authorisation is required. (Trading Standards)</p>	None	<p>Likely demand for these pitches has been identified via the number of requests being received from people who wish to start a business in this manner.</p> <p>Further work is being undertaken to;</p> <ul style="list-style-type: none"> • Examine identified locations to determine if they are available by consultation with the appropriate council service. • Verify if planning permission is required. • Assess demand further by advertising the sites on Sell to Wales with a minimum tender bid. <p>If a business case identifies income is recoverable from additional street trading pitches then this could be implemented.</p>
<p>Exploration of income generation by creating Primary Authority relationships/partnerships (Trading Standards)</p> <p><i>(i.e setting up formal relationships with businesses which will include making a charge for regulatory advice, e.g. providing fair trading advice in relation to contract terms and conditions for a business supplying products or services across the UK.)</i></p>	Demand/ Competition	<p>Initial research to seek interest from business operators who supply goods and services across a wider area outside this region has resulted in limited interest. In addition, any additional income could only be accrued on a cost recovery basis. Therefore the proposal is not to pursue this opportunity further.</p>

Provide new homes warranty inspections in association with LABC New Home Warranty. (Building Control)	None	Currently awaiting an all Wales agreement which may proceed when all legislative issues of the LGA Act are resolved.
Undertake a review of pest control charges (Pest Control)	Reduced demand	Proceed with a review of pest control charges and comparative study with other Welsh LA's. See detailed update at paragraph 7.1.4 to 7.1.13 below.
Maintain current commercial contract work and continue to pursue new opportunities. (Pest Control)	None	Explore opportunities with the Commercial team to market the service to increase the amount of commercial contract.
Increase maintenance contract work within the Authority. (Pest Control)	None	Promote the benefits of utilising the inhouse pest control service across all Council services in conjunction with the Commercial team.
Generate more income by pollution control consultancy and hiring out specialist monitoring equipment. (Pollution Control)	None	Explore opportunities with the Commercial team to hire out specialist equipment to other local authorities or consultants. Promote the benefits of utilising the inhouse pollution control service across all Council services.

7.1.2 Further analysis is required to quantify the potential income generated from these new opportunities therefore additional income has not been identified for this year's 17/18 budget.

7.1.3 In addition a few commercial opportunities identified during the workshops detailed below have recently been implemented and some minimal income achieved which will be subject to review as part of the implementation action plan.

Opportunity	Progress on implementation
Passport checking services (Registrars)	Following liaison with the Home Office for direction and advice this is now offered as an additional service in conjunction with NCS (Nationality checking service). Individuals must have a foreign passport to do it. The authority cannot offer the passport checking service as a stand-alone, it must be in association with the NCS. It has generated an additional income to date in the region of £1.5K.
Provide boxes for cremated remains (Burials and Cremations)	A supplier has been sourced, the boxes manufactured and they are currently in use. This opportunity is generating income, however this is minimal as its only realised £566 to date.
Introduce 5 years leases on monumental kerbs (Burials and Cremations)	Work ongoing to establish new areas for kerb laying and applying the lease arrangement. New flower planters purchased which hold 96 plaques. These are being sold on a 5 year lease at £200 each. Income from flower planters to date £5,400.

7.1.4 In relation to the review of pest control charges and comparative study with other Welsh LA's, the following information looks at the issues in more detail and covers how services are provided elsewhere, fee comparison with others and implications on charging for those services that are currently free, i.e. bedbugs, cockroaches and rats.

7.1.5 The Council has a statutory duty to ensure infestations are dealt with and to enforce any relevant legislation but how they provide the service is not prescribed. Over recent years a number of local authorities have stopped providing the service and the remainder have introduced charging schemes.

7.1.6 In terms of the current position across Wales, of the 22 Local authorities;

- 7 do not provide any direct treatment services. However this is under review in 3 of those and is likely to be reinstated.
- The remaining 15 authorities including Swansea provide a pest control service and each has a different charging scheme.
- The majority like Swansea provide the service in house, only 1 outsources it.
- All of the 15 including Swansea make a charge for all pest control treatments in commercial premises including rats, cockroaches and bedbugs.
- In terms of fee comparison with others, Swansea fees are above the median value for treatments that it charges for.
- Swansea is comparable with 4 other authorities who offer a free service for bedbugs, cockroaches and rats in residential dwellings.
- Very few have a means test system in place for households in receipt of benefits. In Swansea such a system is in place where a reduced price of £21 is made against those treatments that there are charges for, i.e. beetles, fleas, flies, mice and wasps.

7.1.7 In relation to delivery of pest control services there are limited examples of local authorities using alternative providers and the majority of the 15 local authorities provide an in-house service. Only 1 authority outsources it, 1 uses a private company to take on excess work, 2 have developed a joint out of hours service. More detailed studies on alternative provision or stopping services was not pursued as the steer from the initial Gateway review panel concluded that the majority of services fulfil a statutory role and that there are limited opportunities to radically change the way they are provided.

7.1.8 In relation to fee comparison, all of the 15 local authorities operate different charging systems that makes straight comparison with others problematic. However, in terms of comparative data that is available the following table shows that Swansea is above the median value for all of the treatments it currently charges for.

Treatment type	Swansea's fees	LA median value
Beetles	£62	£60
Fleas	£62	£46
Flies	£62	£60
Mice	£62	£40
Wasps	£62	£46

7.1.9 In terms of whether we could introduce charges for those that are currently free, as mentioned previously Swansea is similar to 4 other authorities who offer a free service for bedbugs, cockroaches and rats in dwellings. An analysis has taken place to look at the implications if Swansea was to start charging for these treatments and the following issues identified;

- Only a small number of dwellings are infested with bedbugs or cockroaches so any income generated would be minimal (i.e. in 16/17 there were 55 requests for bedbug treatment and 10 for cockroaches). This could realise income of around £3k if charges at the median value were introduced however it is vital for public health reasons to eliminate these pests quickly as this often requires treating adjacent dwellings to ensure eradication. It is also likely that if charges were made take up of the service would reduce.
- The situation is similar for rats although the number of cases is higher particularly in areas of greater deprivation. It is vital for public health reasons to eliminate these pests quickly. In addition many visits are needed and the majority of visits include other dwellings, the surrounding land and the drainage system to ensure treatment and control can be effective.

7.1.10 For those authorities who do charge for rat treatment the current fees range from £12 to £85 with the median being around £40. Whilst demand in Swansea is currently around 3,000 rat enquiries per year, if a charge to the median value was introduced, it may realise income in the region of £36k per annum. This takes into account the likelihood of a significant drop in service take up by around 70% which other authorities have experienced. This is supported by anecdotal national and local evidence and work

undertaken with members of the Wales Heads of Environmental Health group and their expert panel of which Swansea is a member. In addition, Swansea experienced this when charging was introduced for mice in dwellings. This level of income would also not be achievable given the majority of rat calls are in areas of greater deprivation so any agreed 'discounts' would further reduce income.

7.1.11 For those authorities who have introduced charging for rat treatment or stopped service provision they have also experienced an increase in enforcement work. This has had an impact on costs and resources due to the extra inspections and notices needed to be served for disputes over rat infestations. In particular difficulties arise as no occupier likes to accept blame for infestations and will usually insist that it is some other area which requires treatment. This is particularly true for rat infestations, where it is usually someone else's garden, rubbish, food business, Welsh Waters sewers, etc.

7.1.12 If a charging scheme for bedbugs, cockroaches and rats was introduced in Swansea the likely impacts could include;

- A significant drop off in service take up as those families and individuals with constrained budgets are likely to ignore or self- treat pest problems.
- Charges will fall disproportionately on those less able to pay (who may live in areas more likely to be subject to infestations). This is an important factor in the context of the authority's priority to reduce poverty and improve the health and wellbeing of the community.
- Most pest control treatments do not lend themselves to DIY solutions as they can be ineffective, increase the amount of poison in the environment and are a risk to health.
- Eradication programs need an unknown number of visits to achieve success which will make the charging scheme more complex.
- Reliance on enforcement alone is less effective than a strategic approach which includes advice, guidance, partnership working with Welsh Water to control rat populations in the sewer system, etc.
- An increase in disputes for example individual occupiers are generally cooperative when offered a resolution to rat problems, however disputes could arise if one neighbour refuses to pay for treatment, etc.
- Rats can cause significant health problems for humans.
- Savings are likely to be minimal and short term as there are likely to be longer term enforcement costs.
- A recent article by British Pest Control Association recognises '*that whilst a high number of local authorities no longer offer a free service it's a trend which has the potential to create big problems, particularly in low-income areas*'.
- There is a risk to the Council's reputation as the media often runs stories on rat infestation which is likely to increase if there are disputes and delays to resolve enforcement issues.

7.1.13 In summary the majority of welsh local authorities provide an in-house service and there are few examples of alternative providers. In relation to fees,

Swansea is already above the median for all of its charges and any introduction of fees for those services that are currently free are likely to have a significant impact on enforcement costs and activities. Whilst short term savings maybe achieved there is likely to be longer term increased costs due to the need for more enforcement work, a significant drop off in service take up together with a risk to the Council's reputation as this service plays a significant contribution to protect the health and wellbeing of communities. However as referenced at 7.1 in the income generating proposals table, the service is looking to increase its pest control work within the authority and increase the amount of its commercial contracts with support from the Corporate Commercial team.

7.2 Risks

7.2.1 The risks associated with pursuing the income generating proposals are varied, and for some the risks are not fully known at this stage. It is worth noting that for some there are no risks identified, however a possible diversion of resources away from core business activities which could include high risk activities/statutory functions e.g. enforcement and inspections would be an important consideration for some of the proposals.

7.2.2 All opportunities listed in the table 7.1. above are recommended to be approved in principle subject to more detailed work taking place including conclusive market testing/demand analysis, relevant stakeholder consultation, risks and resources which will determine the financial viability.

7.3. Improve services via IT efficiencies/cross cutting reviews

7.3.1 At an early stage of the review it was identified that there is an opportunity to provide greater service efficiencies via IT improvements.

7.3.2 Senior managers have met with IT colleagues to discuss current corporate developments and what type of IT improvements Public Protection services need. The introduction of Office 365 and Microsoft Skype being currently rolled out across the authority will enable the implementation of agile working/mobile working (i.e. laptops, tablets, mobile devices) for Public Protection staff. Other initiatives, such as Oracle Field Services, will enable mobile access for those frontline officers out on site.

7.3.3 In addition feedback gathered from staff has highlighted what IT improvements are needed to improve service efficiency. Examples of these include channel shifting customer contact such as applying, paying and booking services on line. In addition, a new document management system will replace hard copy files and make them more widely available. Ongoing work will take place with corporate IT colleagues to deliver improvements. Digital Services and Transformation are to undertake a Business Process Analysis of the service in order to map the improvements and efficiencies which may be possible. A procurement exercise to replace some of the back office systems in Building Control has been undertaken. This will provide access for Building Control staff to UNI-form's Building Control module and

related Idox Mobile Apps to enable end-to-end field service working. Further work is ongoing to explore the replacement of the other existing systems with the Tascomi system which may provide a more modern and efficient solution.

- 7.3.4 Work is also being carried out to explore opportunities to improve efficiencies and reduce costs as part of the ongoing business support work and other cross cutting reviews. For example, officers in trading standards and food safety are undertaking a detailed systems thinking review approach by mapping customer access, business processes etc as part of the work being addressed to source additional commercial opportunities/income.

8.0 Conclusions and Recommendations

- 8.1 The review of the service has illustrated that the vast majority of functions are statutory, (i.e. 95 activities are statutory out of a total of 98 activities provided) and of high value providing protection to the public, therefore opportunities for radical change are limited. However the Service is performing well in a very challenging financial climate.
- 8.2 Following recommendations from the Gateway Review Panel, opportunities to generate additional income have been considered, together with new ways of working and ways to improve efficiency, whilst continuing to protect communities and deliver high quality services in line with statutory obligations and the Council's Corporate priorities.
- 8.3 It is recommended that the commercial opportunities which have been identified are subject to further investigation including conclusive market testing/demand analysis, relevant stakeholder consultation and to quantify the likely income generation potential etc. ICT investment will also be required and this is currently being scoped with IT colleagues to determine the extent and the timescales.
- 8.4. It is recommended that the Council continues to provide a free service to residential properties for the treatment of rats, cockroaches and bedbugs.

9.0 Implementation

- 9.1 An implementation plan will be developed subject to approval of this report. Each commercial opportunity will be developed as per the recommendations and will be screened for an EIA as and when required.

10.0 Financial Implications

- 10.1 The total expenditure across Public Protection for 16/17 was £7m, however of this a number of services generated income to the total of £4.3m, so the net budget for 2016/17 was £2.7m. This equates to 61.5% of the total expenditure of Public Protection being realised via income and there maybe scope to increase this further via the income generating proposals put forward as part of the review recommendations.

10.2 However, until a detailed business case for each proposal is developed to analyse and provide a full analysis on benefits, demand, financial viability and likely estimate of projected income, it is difficult to predict the potential yield and therefore make any assumptions at this stage on any budget savings.

11.0 Legal Implications

11.1 There is a requirement for the Council to comply with a range of statutory duties in services provided by Public Protection. Any future service delivery changes will need to ensure continued compliance with relevant legislation and standards.

11.2 As no alternative delivery model is proposed, there are no specific additional legal implications relating to the findings of this review.

12.0 Consultation

12.1 The list below summarises the consultation and engagement the review has conducted.

- Two workshops were held as part of this review which were attended by a cross section of Public Protection stakeholders including the then Cabinet Members for Transformation / Performance and Wellbeing / Healthy City, trade union representatives and staff (both at manager and officer level).
- The Stage 1 workshop was held in July 2016 to capture and define the headline outcomes across the service.
- The Stage 2 workshop in December 2016 considered opportunities for increasing income and IT/service delivery improvements.
- Feedback from all staff was sought via the Monthly team briefings and the Head of Service met with the respective Cabinet Members to discuss the progress of the review.

12.2 Further stakeholder consultation will take place as part of taking forward the income generating proposals detailed in section 7.

13.0 Equality and Engagement Implications

13.1 An EIA screening has been completed for the proposals arising as an outcome of the review but these are not relevant for a full EIA report at this stage.

13.2 However any potential changes to current services following more in depth analysis and market testing of the income generating proposals will be individually assessed and widely publicised particularly to those affected.

Background Papers: Gateway 1/ Stage 2 report & Scoping document.

Appendices:

Appendix A - Examples of service delivery elsewhere in other Welsh authorities

Appendix B - National & local performance indicator results for 16/17

Appendix C - Equality Impact Assessment Screening Form

Appendix A Examples of service delivery elsewhere in other Welsh authorities

Outsourcing	Shared services	Other providers
<ul style="list-style-type: none">• One LA outsources pest control.• One LA utilises a private pest control company to take on some excess pest control work.	<ul style="list-style-type: none">• Two LA's have developed a joint out of hours service.• Two LA's jointly fund an Animal Health EVH officer post.	<ul style="list-style-type: none">• Pest Control - there are external pest control contractors operating locally (but no animal warden service).• Building Control is in direct competition with the private sector for the building control side of the service only. The LA currently commands 80% of the service.• Registration and bereavement services are mainly provided by LA's, there is only one private crematoria in Llanelli.

Appendix B - National & local performance indicator results for 16/17

Public Protection has two national indicators it reports on as follows;

- The percentage of food establishments which are “broadly compliant” with food hygiene standards. Performance has improved year on year since 2010/11 when it stood at 69.22%. However the result for 17/18 was slightly below target, i.e.94% against a target of 96%.
- The percentage of private sector dwellings that have been vacant for more than 6 months at 1st April that were returned to occupation during the year through direct action by the local authority. Result was 16.14% against a target of 17%, which is a significant improvement since 2010/11 when it stood at 1.22%. (The definition of this indicator has changed nationally for 17/18).

Performance for both indicators were recorded as top quartile for the 2015/16 comparative data for all Welsh local authorities. (National comparative data for 16/17 is not published until Autumn 2017.

Local Indicators

- The number of houses in multiple occupation that have been issued with a licence. Result was 1,660 against an annual target of 1,560.
- The percentage of high risk businesses that were liable to a programmed inspection that were inspected for Food Hygiene. Result was 100% against a target of 100%.
- Percentage of Building Control “full plan” applications checked within 15 working days. Result was 99.54% against a target of 100%.
- Respond to enquiries re dangerous structures the same working day. Result was 100% against a target of 100%.
- The percentage of high risk businesses that were liable to a programmed inspection that were inspected for Trading Standards. Result was 100% against a target of 100%.
- The percentage of significant breaches that were rectified by intervention during the year for Trading Standards. Result was 89% against a target of 90%.
- Percentage of general pest control and animal impounding service requests responded to within 3 working days. Result 93.8% against a target of 95%.
- The percentage of new businesses identified which were subject to a risk assessment visit by Trading Standards during the year. Result was 89% against a target of 95%.

Other key comparative data includes the following;

- Swansea is delivering 47.5% of environmental health services to the highest best practice standards compared to an all Wales average of 37%.