

BUDGET CONSULTATION 2013-14



Parking Services & Environmental Enforcement Review Staff Feedback Document

June 2013

1. INTRODUCTION

- 1.1 Councils across England are facing significant financial challenges which are predicted to last much longer than originally forecast. Trafford Council has an excellent track record of managing its budget fairly and effectively and in 2011/12, we achieved the £21.3m savings target ahead of schedule, with half the savings being delivered through transformation projects; furthermore, in 2012/13, we achieved an additional savings target of £12.2m.
- 1.2 Over the next two years, Trafford Council will have to achieve further savings in order to fund a gap of £38.9m; this places tremendous pressure on the Council and its services.
- 1.3 In trying to achieve these savings, services have already developed a number of proposals to review, reduce and in some cases cease service delivery. These proposals were the subject of a 90 day collective consultation process which concluded on 14th January 2013. Services are now going through a period of organisational change in order to implement these proposals and achieve savings for 2013/14 and beyond.
- 1.4 In terms of staffing reductions, following the period of collective consultation, it is anticipated that across the Council, job losses will be in the region of 171.
- 15 In terms of the ETO Directorate, a number of proposals were developed to deliver the budget savings for 2013/14 including a proposed new structure and approach to Environmental Enforcement and Parking Services.

2. INFORMATION & CONSULTATION PROCESS

- 2.1 In respect of Environmental Enforcement and Parking Services, the period of staff consultation commenced on 11th March and ended on 24th May 2013, following an extension to the original consultation period.
- 2.2 During this period consultation was undertaken by a variety of means with staff and trade unions. This included:
- An initial briefing with staff and trade unions on the general budget proposals;
 - Service/team level meetings with staff and trade union officials, with the facility for staff and trade unions to provide verbal, written and electronic feedback on service specific proposals;

- Individual meetings with affected staff and relevant trade union representative (where appropriate), with the facility for staff to provide verbal, written and electronic feedback on the proposals;
- Due to feedback received from the Enforcement team, further one-to-one meetings were made available and clear communication strategies confirmed in writing;

2.3 The purpose of consultation was:

- to inform staff and trade unions of the detailed proposals;
- to consult with staff and trade unions about the proposed implementation strategy;
- to listen to and consider comments and suggestions from staff and trade unions about the proposed implementation strategy;
- to consider any alternatives put forward that meet the identified objectives;
- to seek to minimise the need for any staff redundancies

3. PROPOSAL

3.1 The current structure of this service area is set out in Appendix 1.

3.2 The proposed changes to this service area were shared with staff during the consultation process and as a result of feedback received; a final structure is detailed at Appendix 2.

3.3 **In summary, following consultation, the changes to this service area will be to :**

- Delete the two vacant posts within the Environment Enforcement Structure.
- Delete the remaining 9 Safer Communities Patrol Officer posts.
- Ring-fence the Safer Communities Patrol Team Manager to the Civil Enforcement Project Manager post (fixed term 12 months).
- Increase the number of Enforcement Support Assistant posts in the new structure from the proposed 3.1 to 4.1. Following staff consultation it is agreed that the originally proposed reduction of 2.0 posts could risk the loss of PCN income. This means that 1 FTE post is now at risk of redundancy compared to 2 FTE's in the original proposal.

- Ring-fence the Prosecution Support Officer and Parking Assistant posts to the Enforcement Support Assistant posts.
- Assimilate the Senior Parking Assistant post to the Enforcement Support Officer post. (The Prosecution Officer post in Environmental Enforcement is now vacant).
- Assimilate the post of Parking Manager into the role of Parking Enforcement Support Manager.

3.4 Details of how the new structure will be implemented are shown in Appendix 3.

3.5 A log of the feedback received from staff and trade unions during the consultation process is detailed at Appendix 4.

4. TIMETABLE

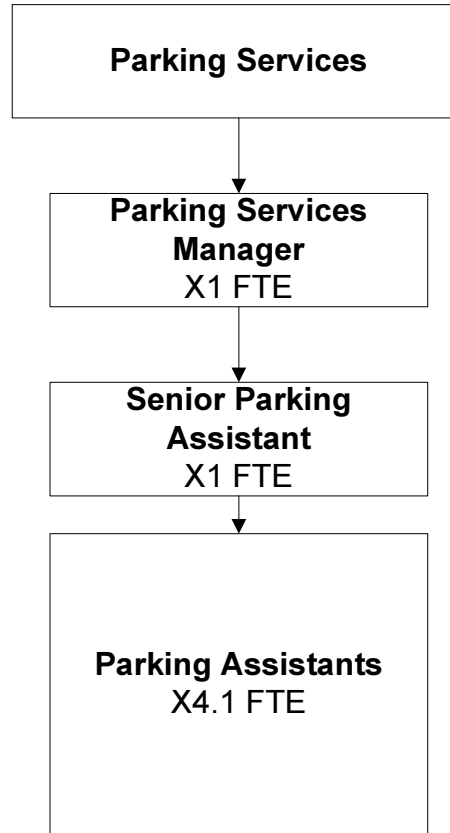
4.1 An initial timetable was issued as part of the consultation process. The following table provides the latest position on the consultation timetable:

DATE	KEY ACTION	ACTIVITIES
24 th May 2013	End of formal consultation	Collate feedback on proposals
25 th May to 7 th June 2013	Consideration of feedback on proposals	Consider feedback from staff and trade unions Consider voluntary options Review proposals in light of feedback
Week commencing 10th. June 2013	Complete End of Consultation Report and communicate to teams (NB report still subject to final Exec approval)	Staff meetings 12/06/13.
24th June 2013	Executive Meeting	Consider feedback and revised proposals Agree proposals

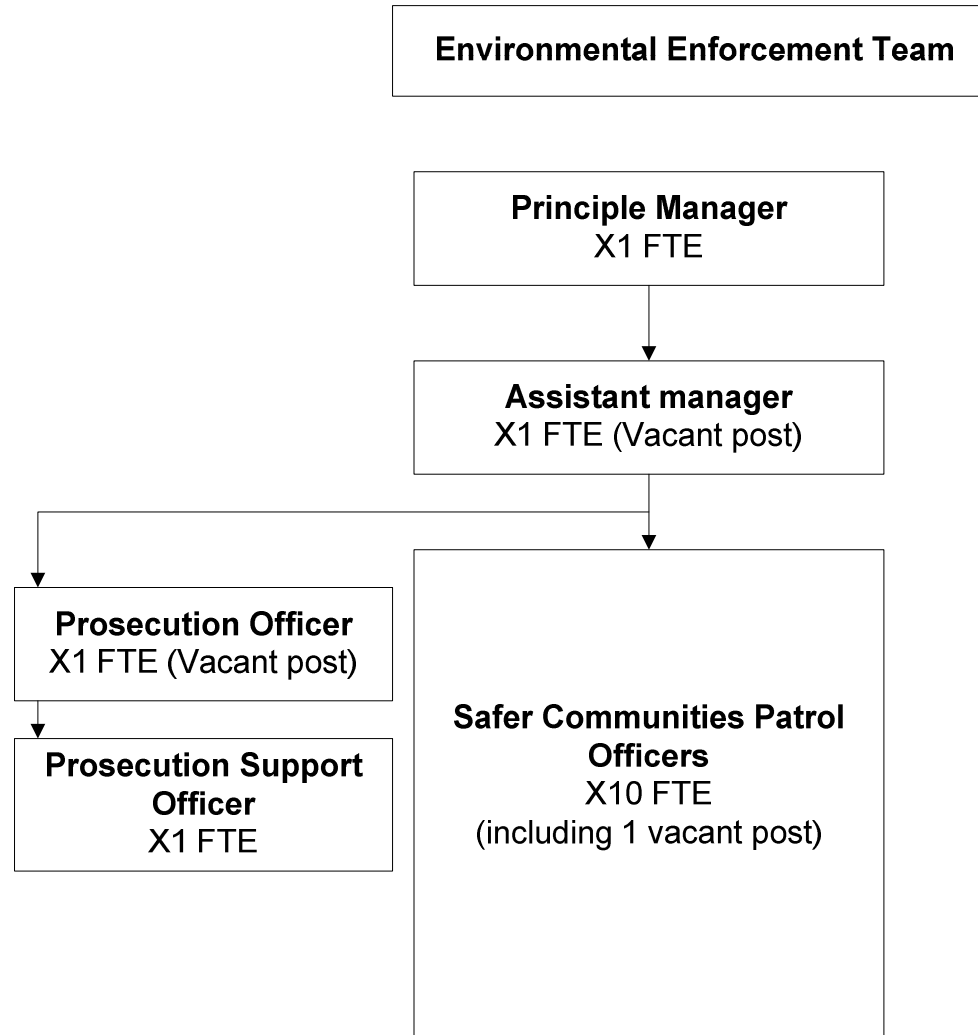
<p>Week commencing 1st July 2013</p>	<p>Notify staff and TU's of the outcome of consultation as soon as possible by email after Executive decision made.</p> <p>Commence implementation/ redundancy selection process</p> <p>Conclude implementation process</p> <p>Confirmation of notice start and leaving dates provided</p>	<p>Assimilate and ring fence staff to posts as appropriate</p> <p>Hold individual meetings with staff identified as redundant and issue notices of redundancy</p> <p>Ensure robust support processes are in place for displaced staff (eg outplacement and redeployment support, time off to seek alternative employment, etc.)</p>
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Appendix 1:

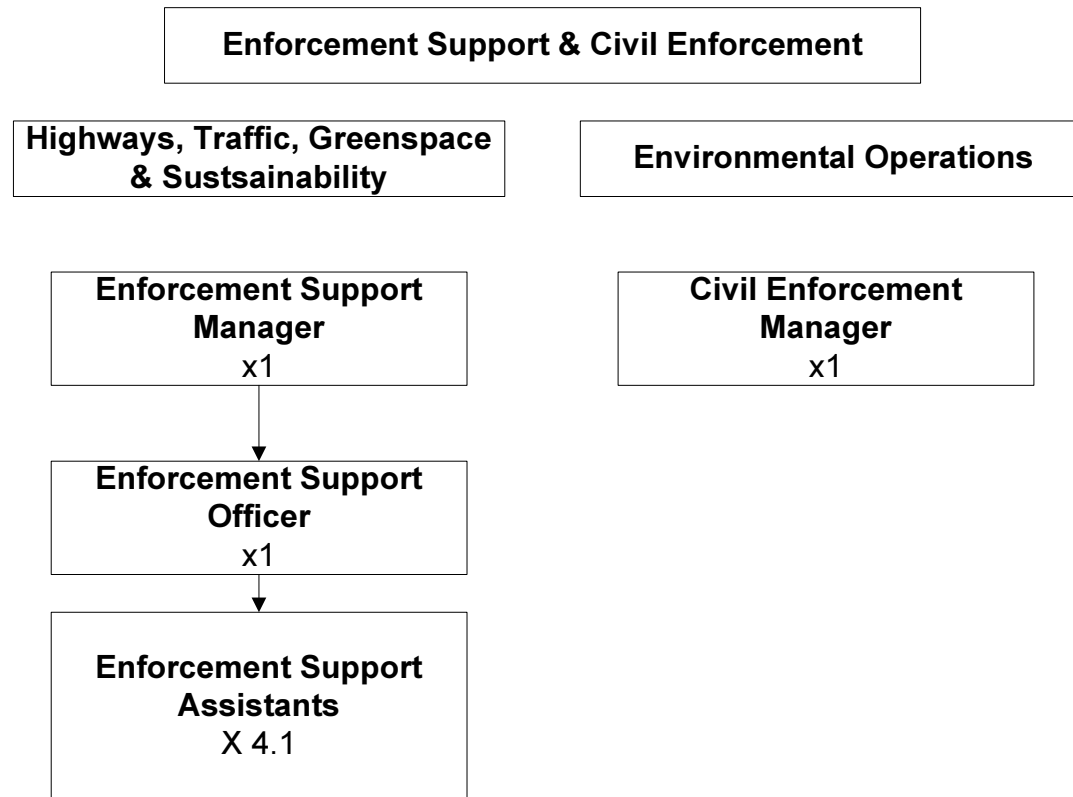
Current Structure – Parking Services Team



Current Structure – Environmental Enforcement Team



Appendix 2:
Revised Proposed Structure
Enforcement Support and Civil Enforcement



**Appendix 3:
Implementation Strategy**

Current Post	Proposal: Ring-fence/ Assimilate/ Dis-establish
Principal Manager Community Safety	Ring-fence to Civil Enforcement Project Manager (fixed-term contract)
Parking Services Manager	Assimilate to Enforcement Support Manager (change of job title)
Safer Communities Patrol Officers x10	Disestablish
Senior Parking Services Assistant	Assimilate to Enforcement Support Officer
Prosecution Support Officer	Ring-fence to Enforcement Support Assistant (x4.1FTE)
Parking Services Assistant x 4.1	

1. Process			
Source	Key Point(s)	Response	Change to proposals
	Inaccurate information used when preparing the business case.		
Initial question from Environmental Enforcement Team	The business case used to inform the Executive in making a decision about the service area is made up of statistical inaccuracies and assumptions produced without any evidence base. These have been outlined and discussed in more detail [below]. It is clear that the author has very limited knowledge of the work carried out by the Safer Communities Patrol Team. How has a person with such limited knowledge of a service area been allowed to write a business case to inform the Executive in making a decision?	Since our aim is to make an informed decision with the purpose of ensuring clean and safe communities effectively and efficiently, it would serve no purpose for us to purposely omit pertinent information. Our data is from a reliable source and we have no reason to query the validity or accuracy of the information. We concede that, on occasion, any extraction of data from computer systems runs the risk of not being 100% accurate or capturing 100% of the information required. However, no additional data provided in your responses gives us concerns that our original proposals are a cause for concern.	No change
Supplementary question from Environmental Enforcement Team	A recurrent theme in the supplementary questions from the Environmental Enforcement Team is that some of the management responses implied that many of the service requests recorded in the CRM had been made up by the team; furthermore, that this was evidence to suggest that the author has no knowledge of the work carried out and how the complaints are generated.	At no point do we accuse the Safer Communities patrol Team of making up service requests, therefore the ensuing conclusions that the author has no knowledge of the work carried out and that the author is suggesting the creation of fictitious service requests are unfounded.	No change

Appendix 4:

Log of Feedback on Proposals

<p>Initial question from Environmental Enforcement Team</p>	<p><i>“During the last twelve months the main focus of activity for the Environmental Enforcement Team has been to issue litter enforcement fixed penalty notices”</i> <i>“Subsequently there has been a major reduction in their community safety work”.</i> <i>“Despite the recent reduction in Environmental Enforcement and interventions in Trafford, reported anti-social behaviour has been significantly reduced as a result of better targeting and interventions from Greater Manchester Police (GMP) and their Police Community Support Officers.”</i></p> <ul style="list-style-type: none"> • What are these recent reductions in Environmental Enforcement and interventions in Trafford that are being referred to? • How has this statistical information been collated as it is incorrect? • Where has the information that better targeting by Greater Manchester Police has seen a significant reduction in anti-social behaviour come from? • Are the comments made by Police inspectors not accurate? • Is this information accurate? 	<p>Since our aim is to make an informed decision with the purpose of ensuring clean and safe communities effectively and efficiently, it would serve no purpose for us to purposely omit pertinent information. Our data is from a reliable source and we have no reason to query the validity or accuracy of the information. We concede that, on occasion, any extraction of data from computer systems runs the risk of not being 100% accurate or capturing 100% of the information required. However, no additional data provided in your responses gives us concerns that our original proposals are a cause for concern.</p> <p>ASB has fallen by 25% in 2012-2013, according to GMP data. This is essentially a GMP priority, within the Safer Trafford Partnership, and all Council services will contribute to the continued decrease in ASB where possible. However, the Council-wide review of Enforcement Services has identified that the high, and escalating cost of providing this non-statutory service is unaffordable in the current financial climate.</p>	<p>No change</p>
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<p>Initial question from Environmental Enforcement Team</p>	<p><i>“Currently the main enforcement activities of the Environmental Enforcement Team deal with litter thrown from vehicles and to a lesser extent litter dropped by pedestrians in town centres”.</i> <i>“Over 90% of all FPN’s currently issued are for littering offences (£50).”</i> <i>“(NB a significant amount of FPN’s issued are subsequently cancelled or unpaid).”</i> The payment rate for fixed penalty notices in 2012/13 is 87%. FPN = £75.00</p>	<p>The value of litter FPN’s has been incorrectly stated in the Business Case. This will be corrected to £75 in future documentation.</p>	<p>No change</p>
<p>Initial question from Environmental Enforcement Team</p>	<p>It appears that there is little knowledge of what the service area actually delivers. Why is there no mention of?</p> <ul style="list-style-type: none"> • Abandoned wheeled bins? • Contaminated recycle bins? • Abandoned shopping trolleys? • Illegal transportation of waste? • Litter and waste on private land? • Nuisance parking? • Fly posting? • Obstructive A boards? • Domestic waste issues? • Commercial waste issues? 	<p>These are relatively low demand areas of work. The approach that will now be taken will not be enforcement driven and we will seek to deal with (e.g. clear up) problems as soon as they are reported. The specifics for dealing with each of these infrequent issues will be developed as part of the new approach.</p>	<p>No change</p>

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<p>Initial question from Environmental Enforcement Team</p>	<p><i>“This service area is both costly to provide and it is apparently having a limited impact on changing the behaviour of Trafford residents”.</i></p> <ul style="list-style-type: none"> • Who is the limited impact apparent to? • What statistical information was used to inform the author that the service area is apparently having a limited impact on changing the behaviour? 	<p>The word “apparent” is used, as there is little or no evidence to suggest that the current patrol and enforcement approach is having any significant impact on changing behaviour. For example, there were 973 service requests or activities logged in 2012/13, in relation to dog fouling. Only 3% of these resulted in FPN’s being issued, and the number of complaints about dog fouling has increased over the last three years, whereas FPN’s have remained at a generally low level.</p>	<p>No change</p>
<p>Initial question from Environmental Enforcement Team</p>	<p><i>“The use of CCTV cameras will be evaluated to see if they can be used to tackle litter in the town centres – other Councils have employed this approach”.</i></p> <p>Recent changes to the Regulation of Investigatory Powers Act 2000 restricts the use of CCTV to cases that carry a custodial sentence. Failing to clear up after your dog or leaving litter does not carry a custodial sentence.</p> <p>This should not be included in the business case as an option, as this option is not available.</p> <p>Why was this not investigated before being mentioned as an option in a business case to disband a service area?</p>	<p>CCTV camera images will not be used directly as evidence of offences. Contact from the Control Centre would allow staff to engage directly with people who were littering or dog fouling. The purpose of this contact would not be to take enforcement action. CCTV cameras may be used, as one of the alternatives to the penalty notice driven approach currently in operation. Other Councils have used CCTV to alert enforcement officers and PCSO’s to potential offences, to help gather intelligence and even to deter offences from being committed.</p>	<p>No change</p>
<p>Initial question from Environmental Enforcement Team</p>	<p><i>“ASB has decreased in the Borough and the assessment by the service and GMP is that decommissioning of the team will have minimal impact”</i></p> <p>A recent e-mail received from one of the Neighbourhood Police Inspectors states: <i>“Over the past couple of years, the relationship between the Safer Communities Patrol Team and my Neighbourhood Policing Team has grown from strength to strength. So much so, that the CSPT</i></p>	<p>Discussions have been held with senior officers of GMP Borough Command and senior officers of Trafford Council. Whilst it is acknowledged that the Team has contributed to reductions in ASB, this is a Greater Manchester Police priority, for which the Police and PCSO’s take most of the credit. In future, this collaborative working can be delivered in a far more cost-effective way and with better coordination across other Council services.</p>	<p>No change</p>

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	<p><i>are one of my first considerations when I am considering ASB issues.</i></p> <p><i>The team works closely with my staff, both Police Officers, Police Community Support Officers as well as Special Constables and have been involved in numerous joint operations around Environment and Safety issues. These have included targeted joint patrols of know anti-social behaviour hot spots and burglary risk areas using risk map data provided by the Police Hub.</i></p> <p><i>In conjunction with my team, the CSPT have been involved in joint events to promote a reduction in crime and anti-social behaviour in the area as well as establishing working arrangements where intelligence is shared between both parties. This information sharing and partnership working has had a massive impact on the number of reported ASB incidents and offences of Criminal Damage across the area which have seen dramatic reductions.</i></p> <p><i>There is no doubt that this partnership approach assists both the Local Authority and the Police, enabling resources to be targeted where they are most needed. With the current economic climate and reduction in resources across all public sectors, it is vital that my team retains this relationship with the CSPT to ensure Anti-Social Behaviour continues to be dealt with in an effective manner.</i></p> <p><i>I look forward to working alongside the team in the future to ensure that we maintain this excellent performance”</i></p> <ul style="list-style-type: none">• What assessment by the service has been carried out?		
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	<ul style="list-style-type: none"> • What assessment by GMP has been carried out? • Can a copy of both of these assessments be made available 		
Initial question from Environmental Enforcement Team	Why is the Safer Communities Patrol Team identified with different names throughout the business case? How can any confidence be held in the accuracy of the information contained within the business case when the author cannot even get the title of the team correct?	Since our aim is to make an informed decision with the purpose of ensuring clean and safe communities effectively and efficiently, it would serve no purpose for us to purposely omit pertinent information. Our data is from a reliable source and we have no reason to query the validity or accuracy of the information. We concede that, on occasion, any extraction of data from computer systems runs the risk of not being 100% accurate or capturing 100% of the information required. However, no additional data provided in your responses gives us concerns that our original proposals are a cause for concern.	No change
	Consultation with public and availability of all consultation responses		
Initial question from Environmental Enforcement Team	It is noted that this is a public consultation. How and where has the “public” been made aware of this? Who has been told and when were they told?	The document which has been referred to within your feedback is a staff consultation document.	No change

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Initial question from Environmental Enforcement Team	Who will be shown this document?	<p>The staff consultation report is provided to affected Council Staff, staff who are supporting the change, Management and Members, as required by the Organisational Change Framework.</p> <p>Staff questions, responses and proposals are considered by senior management and form the basis of the end of consultation report.</p>	No change
Initial question from Environmental Enforcement Team	Will all feedback be shared with all those affected (e.g. will Environmental Enforcement staff be able to see feedback from Parking Services?) Will the feedback be contained in the final report?	There will be one end of consultation document which will be shared with all affected staff.	No change
General Approach & Stakeholder Consultation			
Supplementary questions from UNISON	Whilst it is appreciated that within these times of austerity severe financial constraints have been placed on the authority, In order to ensure that full consideration has been given to all other services that may be delegated to undertake the non-enforcement duties of this team it is only reasonable that the questions asked be answered and the services that have been allocated these duties involved in the process. The rhetoric that has been continuously repeated throughout this document does not show that consideration has been given to the role of the Safer Communities Patrol Team all emphasis has been given to the self-funding aspect of their role.	Statistical evidence shows that the whole team have, in the most part, been engaged in Environmental Enforcement, specifically, the issue of FPNs for moving vehicle offences. The non-enforcement activities of the team have been very limited for some time. The Council-wide Review of Enforcement Services has identified that the Council's Environmental Enforcement Team cannot be operated on a self-funding basis solely from FPN income and that the high and escalating cost of providing this non-statutory service is unaffordable.	No change
Supplementary questions from UNISON	<i>"Initial consultations have taken place with staff, partners and external providers, to deliver regular and ad hoc enforcement and education activities."</i>	All the measures that the Council intends to put in place, as an alternative to the penalty-notice driven approach currently in operation, will be delivered within existing resources and budgets.	No change

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	<p>It is not enough to make a sweeping statement such as this in relation to a meaningful consultation, if it has been necessary to engage with these stakeholders in order to ensure continuity of service, then there should be no reason not to divulge this information to staff. Whilst the removal of this team may produce immediate cost savings, the added implications on delivery in the areas of the service where public engagement and partnership working may have an undisclosed cost.</p>		
<p>Supplementary questions from Environmental Enforcement</p>	<p>Your reply to the feedback states that initial consultations have taken place with staff, partners and external providers to deliver regular and ad hoc enforcement and education activities. Who are these companies? What would the financial cost of employing these outside agencies to perform some of our functions be? Also, if these staff have recently been involved in the consultation, I would like to see a copy of their consultation feedback.</p> <p>If a private external provider is used to carry out our duties then surely TUPE applies?</p>	<p>Consultation has taken place with staff and key partner agencies. Although enquiries were made to judge private sector capacity to deliver one-off or occasional event-specific enforcement there are no plans to deliver enforcement activities through an external provider, therefore TUPE does not apply.</p>	<p>No change</p>

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<p>Supplementary questions from UNISON</p>	<p><i>"The previous section of this response document addresses the measures that the Council can put in place, in response to individual issues currently dealt with by the Safer Communities Patrol Team. There will be more engagement with residents, to deliver smarter solutions to eliminating fly-tipping, and the proposal has capacity to target alternative resources, and to bring in additional ad hoc enforcement, to deal with problems. Street cleaning resources can be reviewed if required."</i></p> <p><i>Once again</i> reference is made to ad hoc enforcement, street cleaning can and Smarter solutions but no reference is made to what constitutes these resources and what any potential cost may be. The lack of detail and consideration may have a hidden cost not immediately apparent.</p>	<p>All the measures that the Council intends to put in place, as an alternative to the penalty-notice driven approach currently in operation, will be delivered within existing resources and budgets.</p>	<p>No change</p>
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<p>Supplementary questions from UNISON</p>	<p><i>"It is acknowledged that elements of the team's work are intelligence-led, but the focus of future enforcement will develop more sophisticated intelligence, in order to better target specific problem areas for all environmental anti-social behaviour. For example, there will greater coordination of resources in organising and delivering community clean ups, better use of CCTV, for intelligence gathering, and systems will be developed that will enhance joint working and collaboration with partners."</i></p> <p>Who/what are the resources that will be organising and delivering/coordinating? What systems are currently in process? Who will be developing and implementing these systems? Constant reference is made to targeting resources, a lot of the resources that have been indirectly referred to are within other areas of ETO which are also currently under stress from organisational change and the numbers employed are dwindling. Will the authority be reviewing its priorities or will this have the potential to increase the current overtime budgets which would naturally reduce any savings made?</p>	<p>The retained post of Civil Enforcement Project Manager will be developing and implementing all the new measures to replace the current enforcement-driven approach. Work that will be carried out by partners and other parts of the Directorate within existing budgets.</p>	<p>No change</p>
<p>Supplementary questions from Environmental Enforcement</p>	<p>The reply to feedback document states that a more coordinated and intelligence led approach will be employed in the future. Why has senior management not encouraged this presently?</p>	<p>In recent years, the main focus of the work of the team has been increasingly to generate income from FPNs. This has been unsuccessful and has illustrated that the team cannot operate on a self-funding basis and provide an overall level of service that the Borough requires. A more intelligence-led approach is part of a package of measures designed to reduce the overall cost, whilst introducing alternative interventions.</p>	<p>No change</p>

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Supplementary questions from UNISON	<p><i>"The Business Case was incorporated within the Council Wide Review of Enforcement. The Review Team evaluated and identified a range of measures that the Council can put in place to deliver the environmental enforcement and education functions, currently carried out by the Safer Communities Patrol Team. "</i></p> <p><i>The</i> business case which underpins the consultation is not clear and constant reference to "a range of measures that the council can put in place" ...</p> <p>Neither the measures identified nor the means of evaluation have been brought forward as part of the management proposals. The lack of information does not identify cost implications or service failure which may occur in the event that there is not enough capacity within the service to meet all business needs.</p> <p>Unison believe that the least the SRO should do is be able to answer questions honestly and show that they have considered all elements of the role and be able to show that creative and service delivering solutions have been found.</p>	The business case gives examples of a range of measures and new initiatives to the fixed penalty notice regime. The new post of Civil Enforcement Project Manager will have the responsibility to develop and deliver these and similar initiatives over the next 12 months. This will include on-going monitoring and evaluation and the introduction of further measures to deal with any unforeseen problems with service delivery.	No change
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2. Service Delivery			
Source	Key Point(s)	Response	Change to proposals
	Capable Guardianship, ASB Intelligence Gathering,		
Initial question from Environmental Enforcement Team	<p>i) How will the 'capable guardianship' role be provided in the future?</p> <p>ii) How will the work around anti-social behaviour intelligence gathering be achieved in the future?</p>	<p>The Council has upwards of 200 street- and parks-based staff, who contribute to capable guardianship across the Borough, 7 days a week, including most Bank Holidays.</p> <p>The work around anti-social behaviour intelligence gathering and patrolling will be absorbed, where possible, by existing Council staff and Greater Manchester Police.</p>	No change.
Supplementary questions from Environmental Enforcement	<p>Although your reply does answer how you intend to absorb the function, it omits the fact that there will be a lack of uniformed visual presence in neighbourhoods.</p>	<p>There will be a reduction in uniformed visual presence in the neighbourhood following disestablishment of the Environmental Enforcement Team. However the intention is that a range of uniformed staff, identifiable as Trafford employees will gather intelligence and challenge behaviour, e.g. litter and dog fouling. So the net effect will be that more intelligence-gathering and interactions with the public will take place.</p>	No change.
	How will Trafford Watch be absorbed into existing functions?		

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<p>Initial question from Environmental Enforcement Team</p>	<p>Has there been any analysis carried out on the impact on Police Patrols to cover the work the team carries out?</p>	<p>The focus for enforcement will be to utilise existing resources in a more intelligence-led and targeted way. GMP have agreed to training for PCSO's to enable them to identify and challenge litter and dog fouling when they encounter it. Similar training will be given to some Groundforce staff to enable them to work in a similar manner. The new approach will not only deliver a considerable saving but will also be potentially more effective in some areas, e.g. parks and green space.</p>	<p>No change.</p>
<p>Supplementary questions from UNISON</p>	<p>Please confirm when you have consulted with GMP and when you propose to consult with Groundforce staff? We would also like to point out that very few parks and green spaces are permanently staffed. Most are visited on a rota basis and not daily. Please clarify who "some" are.</p>	<p>Discussions have been held with senior officers of GMP Borough Command and senior officers of Trafford Council. We do not consider it necessary to consult formally with teams (e.g. Ground Force) that will not have their roles and responsibilities significantly changed.</p>	<p>No change.</p>
<p>Litter (Street, Accumulations, Businesses)</p>			
<p>Initial questions from Environmental Enforcement Team</p>	<p>i) How will the council ensure the problem with litter does not escalate? Does the Council think that simply cleaning up litter will solve the issue? How can this be sustained with an ever-decreasing workforce? ii)Who will: Issue litter fixed penalty notices in the future? (Will there be an income target attached to litter fixed penalty notices in the future?); Who will deal with statutory nuisance for accumulations of litter: establishing land ownership, making landowners aware of their responsibilities,</p>	<p>The proposal will tackle litter enforcement and cleansing in a more coordinated way, with more intelligence led and targeted use of resources, including developing and utilising the Locality model to engage with residents and businesses. The Council recognises that answering and responding to calls often does not actually address the root cause of the calls and that often a more strategic preventative approach is more effective; both reducing the number of offences and calls from residents. There is insufficient evidence to suggest that the existing patrolling approach,</p>	<p>No change.</p>

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	<p>actions in default; Who will advise local businesses about litter control issues in the neighbourhoods? iii) Who will advise businesses about major litter problems at events and the distribution of free literature? iv) Who will undertake the educational and campaigning work, primarily aimed at reducing litter and dog-fouling? (E.g. Dog Poo Fairy, Food on the Go). v) The business case states, "...however measures are planned to allow timely targeted responses to address these issues?" (Short term, localised littering and fouling problems). What are the planned measures?</p>	<p>with the aim of enforcement of these areas, is effective in reducing offence or changing behaviour. The Council is proposing a more proactive and preventative approach through community engagement using the Locality model, and more co-ordinated and targeted enforcement between Council services and occasionally other local provisions such as the GMP.</p> <p>It is proposed that a range of alternative measures will be developed and implemented, to replace the environmental enforcement functions currently carried out by the Safer Communities Patrol Team. There is little evidence that this is a major problem, and there are a number of other street-based officers within Environment, Transport and Operations, who already monitor Highway issues and engage with businesses - and deal with licensing and nuisance at large events.</p> <p>The proposal includes a range of alternative measures, to deliver all environmental education and compliance functions, in a more co-ordinated and cost-effective way.</p> <p>GMP have agreed to training for PCSO's to enable them to challenge litter offences when they are encountered. Similar training will be given to some Groundforce staff to enable them to work in a similar manner. The proposal also has capacity to target resources to challenge littering and to bring in additional ad hoc enforcement to deal with problems. Street cleaning resources can be reviewed if required.</p>	
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Appendix 4:**Log of Feedback on Proposals**

Supplementary questions from Environmental Enforcement	At meetings held on the 11th of March and the 15th of March Alun Morgan was specifically asked if he was going to use outside/private enforcement teams in the future. Alun stated that outside enforcement teams would “absolutely not” be used as fixed penalty notices would not be issued. The reply to the feedback contradicts what was stated in both meetings.	The information given by Alun Morgan on 11th and 15th March is correct. Although enquiries were made to judge private sector capacity to deliver one-off or occasional event-specific enforcement there are no plans to deliver enforcement activities through an external provider.	No change.
Supplementary questions from Environmental Enforcement	Although you state Street Cleaning resources can be reviewed if required has there been any cost analysis carried out in relation to this? It appears you are making a decision to disband a service area without giving any real thought to any additional costs that might arise from the decision.	<p>No cost analysis has been carried out in relation to this.</p> <p>Although 2400 litter offences were investigated in 2012/13, only 1600 Fixed Penalty Notices were issued. Over 70% of these were for littering from moving vehicles. Over the last two years, this has made up 90% of the total income for the Safer Communities Patrol Team. There is no evidence to suggest that this type of enforcement has any significant impact on reducing the amount of litter in the Borough.</p> <p>The proposal will tackle litter enforcement and cleansing in a more coordinated way, with more intelligence led and targeted use of resources, including developing and utilising the Locality model to engage with residents and businesses.</p>	No change.

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<p>Supplementary questions from UNISON</p>	<p>Not all of the questions were answered by the response provided. Please clarify who these departments are and if they have been consulted as a stakeholder in the proposal.</p> <p>Please answer the question in a clear concise manner, to state that alternative measures will be developed is not an answer it is a suggestion and does not form any part of a true business plan.</p> <p>Please also advise which street based officers within ETO have been considered and advise if they have been consulted as a stakeholder.</p> <p>Can you please advise where in the proposal the range of alternative measures (for delivery of environmental education) are? Without substantive proofs how can you effectively say that this will be cost effective?</p>	<p>The continuation of the litter clearing service should be taken in context of the overall proposal. The proposal is that there will be closer working with other teams within Environment, Transport and Operations - in a more coordinated way, with more intelligence led and targeted use of resources, including developing and utilising the Locality model to engage with residents and businesses. We will take these questions into consideration and ensure that in the final implementation of the proposal responsibilities are clear including where co-ordination among services is necessary. Any business change is necessarily a dynamic and flexible process. Therefore in the initial stages of implementation, there will be a system in place to handle any minor changes necessary in order to fine tune the on-going service provision. Staff will be supported through the minor changes to their job roles and we will of course consider the need for retraining if necessary. In return, we expect staff to show some flexibility in the initial stages of implementation in order to ensure a good service is provided. We do not consider it necessary to consult formally with teams whose roles and responsibilities are not significantly changing. As stated, there are already street-based officers within ETO that monitor and engage with businesses and this will continue.</p>	<p>No change.</p>
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	Dog Fouling		
<p>Initial question from Environmental Enforcement Team</p>	<p>i) Does the council think that simply cleaning up dog fouling will solve the issue?</p> <p>ii) Who will: Respond to dog-fouling complaints; Issue FPNs; Patrol hot spot areas; Prosecute repeat offenders?</p>	<p>There is no evidence to suggest that the current patrol and enforcement approach is having any impact on changing behaviour. In fact, examination of CRM shows that the number of complaints about dog fouling has increased over the last three years, whereas FPN's have remained at a generally low level.</p> <p>The Council's proposal provides for more than "simply cleaning up dog fouling". The Council's proposal recognises that the current approach to resolving the dog fouling issue is not effective. The Council is therefore proposing a different, co-ordinated approach in order to attempt to reduce dog fouling more effectively by getting more people to clean up after their dogs.</p> <p>The Council aims to implement an approach that reduces the number of calls received regarding dog fouling. The Council also recognises that often, answering and responding to calls doesn't actually address the root cause of the calls. The Council is proposing a more proactive and preventative approach through community engagement and co-ordinated and complementary enforcement between the Council and GMP.</p>	<p>No change.</p>

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<p>Supplementary questions from Environmental Enforcement</p>	<p>You state there is no evidence to suggest that the current patrol and enforcement approach is having an impact. Recent feedback from a dog fouling campaign suggests that the friends of parks and local Councillors have seen a significant increase in people clearing up after their dogs following significant patrols of dog fouling hot spots. Is this not evidence of an impact?</p>	<p>The proposal is that a range of uniformed staff, identifiable as Trafford employees will gather intelligence and challenge behaviour, e.g. litter and dog fouling. So the net effect will be that more intelligence-gathering and interactions with the public will take place. Although cessation of moving-vehicle litter offence enforcement has released resources to conduct an anti-dog fouling campaign this work is unsustainable within the current budget.</p>	<p>No change.</p>
<p>Abandoned Vehicles & Nuisance Parking</p>			
<p>Initial question from Environmental Enforcement Team</p>	<p>Who will: Respond to complaints of abandoned vehicles and nuisance parking; Issue FPNs; Prosecute offenders?</p>	<p>The Council recognises that answering and responding to calls often does not actually address the root cause of the calls and that often a more strategic preventative approach is more effective: both reducing the number of offences and calls from residents. There is insufficient evidence to suggest that the existing patrolling approach, with the aim of enforcement of these areas, is effective in reducing offence or changing behaviour. The Council is proposing a more proactive and preventative approach through community engagement using the Locality model, and more co-ordinated and targeted enforcement between Council services and occasionally other local provisions such as the GMP.</p> <p>This is not a high priority area of enforcement. It is intended that a new approach to dealing with abandoned vehicles will be developed in the next 12 months.</p>	<p>No change.</p>

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Supplementary questions from Environmental Enforcement	This is a specific piece of legislation that Police and PCSO's are not empowered to deal with. (Nuisance Parking).	The Council will review appropriate authorisations.	No change.
Supplementary questions from UNISON	Please clarify who the street based officers are and why they have not already been dealing with these requests. If they have how many have they dealt with and what were the outcomes, who logs these and in the worst case if there was a prosecution who would deal with them.	As stated, the number of requests received about nuisance parking does not necessarily equate to requiring an enforcement response from the Safer Communities Patrol team. The evidence suggests that nuisance parking is not an issue within the borough. In the very rare circumstance that a serious issue did occur, the Council will ensure that appropriate action is taken without the need for a team dedicated to this function.	No change.
	Fly posting and A boards		
Initial question from Environmental Enforcement Team	Who will: Remove flyposting and obstructive A boards; Speak to problematic businesses; Prosecute offenders?	Groundforce staff, operatives and contractors clear litter and graffiti, and could potentially be assigned to remove fly-posting. There are a number of other street-based officers within the Council, who are already empowered to take enforcement action against fly-posting, A boards and graffiti, and engage with businesses.	No change.
Supplementary questions from Environmental Enforcement	It makes complete sense that the removal of fly posters is a Groundforce function. The reason they are not already carrying out this function is that it requires a level of enforcement to control it. If it is simply removed every time it appears the problem will escalate. Is an escalation in fly posting	There is no evidence to show that removal of fly-posting will cause an escalation. Timely removal, might actually be a dis-incentive.	No change.

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	acceptable?		
Supplementary questions from Environmental Enforcement	It makes complete sense that A boards are dealt with by Highways staff. The reason this function is with the Safer Communities Patrol Team is that Highways have always stated they don't have the resources to deal with it. Have things now changed?	Correct.	No change.
Supplementary questions from UNISON	Who are the street based officers? If they are already dealing with the problem how is it recorded? Have they been consulted, is there enough capacity within their current role to ensure that the task is being undertaken?	Environmental Enforcement team members have provided feedback agreeing that it makes sense for these to be Groundforce functions. Since there is insufficient evidence to suggest that enforcement reduces the occurrence of fly-posting, the Council is aiming to reduce the occurrence through proactive engagement with local residents and businesses.	No change.
	Domestic and Commercial Waste Issues		
Initial question from Environmental Enforcement Team	<p>i) Who will:</p> <p>Respond to complaints about wheelie bins and containers left out in neighbourhoods;</p> <p>Persuade/enforce/prosecute to ensure householder/business compliance;</p> <p>Ensure that the public purse is not paying for waste disposal that it should not be paying for;</p> <p>Investigate illegal deposits of business waste/domestic waste;</p> <p>Recover the costs of removing fly-tipped waste;</p> <p>Investigate the illegal deposit of waste on</p>	<p>The emphasis in future will be to deliver waste collection and monitoring, and engage with residents, in a more coordinated and cost-effective manner. The proposal will incorporate other street-based officers within Environment, Transport and Operations, who already monitor waste collection issues, and are empowered to take enforcement action.</p> <p>The proposal will target existing resources, to engage with businesses, to ensure efficient waste collection arrangements, and compliance with legislation. Environment, Transport and Operations staff already deal</p>	No change.

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	<p>unlicensed land?</p> <p>ii) Will the Tidy Business Award scheme continue? If so, who will operate, promote and undertake assessments of businesses?</p>	<p>with business premises in a regulatory and enforcement capacity. The proposal also has capacity to target resources to bring in additional ad hoc enforcement to deal with problems.</p> <p>Other officers within Environment, Transport and Operations carry out similar functions, to monitor, regulate and enforce on business operations, to ensure compliance. Alternative measures will be investigated, in partnership with Greater Manchester Police, the Environment Agency and other key stakeholders.</p> <p>Fly-tipping will be tackled using a more coordinated approach, with more intelligence led and targeted use of resources, utilising the skills of other officers within the Council, who currently carry out PACE interviews and similar enforcement functions.</p> <p>The Tidy Business Award scheme could be delivered by other officers within ETO, who engage with, and monitor business activity, to deliver environmental education and compliance functions. This scheme could also be delivered by or through the new Locality partnerships.</p> <p>In relation to question (i) please also see answers to similar previous questions.</p>	
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Supplementary questions from Environmental Enforcement	<p>"In fact from 1st April 2012 to 31 March 2013, there were 44 prosecutions for waste offences. Who provided you with this wrong information?"</p> <p>This data is agreed</p>	This data is agreed. CRM data was provided by the Partnerships and Performance Team.	No change.
Supplementary questions from Environmental Enforcement	No other person in Environment, Transport and Operations has been empowered to take enforcement action against waste offences.	The Council will review appropriate authorisations.	No change.
Supplementary questions from Environmental Enforcement	<p>As far as I am aware, my colleagues in Public Protection are the only other service that carries out PACE interviews within the Directorate. Public Protection removed their teams from the Enforcement Review stating they should not be included as they are not an enforcement service. This is contradictory.</p>	<p>Public Protection Service was not removed from the Enforcement Review, their established service review and budget programme was not compatible with the other service proposals of the review.</p> <p>It is intended that a new approach to dealing with fly-tipping will be developed in the next 12 months.</p>	No change.
Supplementary questions from UNISON	<p>Who are these officers? Have they been consulted and do they have the capacity within their current role to undertake the duties outlined? Please answer the questions in a clear concise manner alluding to the same response is not conducive to meaningful consultation.</p>	During the next 12 months, the Civil Enforcement Project Manager will be tasked with developing a number of new approaches to matters currently dealt with by the Environmental Enforcement Team.	No change.

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<p>Supplementary questions from UNISON</p>	<p>Yet again further inference that measures will be investigated the business plan does not currently explain what the alternative is. The current team already appear to work in partnership with GMP. What are the responses from the current stakeholders to the proposals put forward? This should be part of the original business plan. Please answer the original questions as they have been put forward.</p>	<p>Please see answers to similar previous questions. Since there is insufficient evidence to suggest that enforcement reduces the occurrence of offences, the Council is aiming to reduce the occurrence through proactive engagement with local residents and businesses.</p>	<p>No change.</p>
<p>Supplementary questions from UNISON</p>	<p>In respect of Tidy Business Award, The question has once again not been answered; the response refers to considerations and other officers. Please answer the questions clearly and concisely. Have the stakeholders who are part of this scheme aware of the authority's decision to end the scheme? Have the stakeholders mentioned who MAY be undertaking the work been consulted?</p>	<p>Please refer to previous statements and responses, but bear in mind that any business change is a dynamic and flexible process. The Business Case does not suggest the ceasing of these schemes. In the initial stages of implementation of the business case there will be a system in place to handle any minor changes necessary in order to fine tune the on-going service provisions. All those affected will be supported through the changes.</p>	<p>No change.</p>
	<p>Abandoned Shopping Trolleys</p>		<p>No change.</p>
<p>Initial question from Environmental Enforcement Team</p>	<p>Who will: Coordinate and monitor the contract; Respond to complaints; Deal with store-specific issues ?</p>	<p>The overall number of complaints in respect of shopping trolleys, during the last 4 years, would appear to show that the contract, which is delivered at no cost to the Council, is reasonably successful and runs efficiently. Within the proposal, this work could be absorbed by other officers within Environment, Transport and Operations, who monitor similar existing contracts, and engage with businesses.</p>	<p>No change.</p>

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Supplementary questions from UNISON	Who are these officers? Please answer the questions as they have been asked rather than using statistics.	Ground Force staff.	No change.
	Community Tool Library		No change.
Initial question from Environmental Enforcement Team	<p>i) Will this scheme continue?</p> <p>li) If not, has there been any analysis of the impact on volunteering?</p> <p>lii) If the scheme will continue, who will run it?</p>	No decision has yet been made about the continuation of the Tool Library, although the Council owns several thousand pounds worth of equipment, which constitutes a valuable community asset. This asset could be managed by other Council staff, although investigations will be carried out, to establish whether a Community group would be best suited to coordinate use of these facilities, within the new Locality working arrangements.	No change.
Supplementary questions from UNISON	What other council staff could manage this facility and why have investigations not already been undertaken regarding this valuable community asset? Concise information regarding this should reasonably have been included as part of the original business plan.	Please refer to previous statements and responses, but bear in mind that any business change is a dynamic and flexible process. The Business Case does not suggest the ceasing of these schemes. In the initial stages of implementation of the business case there will be a system in place to handle any minor changes necessary in order to fine tune the on-going service provisions. During the next 12 months the Civil Enforcement Project Manager will investigate how the scheme can best continue.	No change.
	Street Champions		No change.

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<p>Initial question from Environmental Enforcement Team</p>	<p>i) Will the scheme continue? ii) If so, who will coordinate activity, deal with requests from champions and promote the scheme?</p>	<p>The Street Champions scheme aligns closely with the recently appointed Community Ambassadors positions, and one option being considered is for this scheme to be delivered by the new Locality partnerships.</p> <p>Please refer to previous statements and responses, but bear in mind that any business change is a dynamic and flexible process. The Business Case does not suggest the ceasing of these schemes. In the initial stages of implementation of the business case there will be a system in place to handle any minor changes necessary in order to fine tune the on-going service provisions. During the next 12 months the Civil Enforcement Project Manager will investigate how the scheme can best continue.</p>	<p>No change.</p>
	<p>Miscellaneous Requests and Activities</p>		<p>No change.</p>
<p>Initial question from Environmental Enforcement Team</p>	<p>Environmental Enforcement undertakes a range of activities which are not within the remit of any other department, (172 in 12-13) who will take responsibility for these?</p>	<p>We will work with Access Trafford and the Civil Enforcement Project Manager to make alternative arrangements about how to deal with these complaints, within existing budgets.</p>	<p>No change.</p>

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Supplementary questions from UNISON	Please advise where this sits within the proposal, can you also advise if you have involved Access Trafford as part of the consultation, whilst it is appreciated that this is a buy back service, there appears to be no clear plan where these service requests need to be logged; without forward planning this could lead to an escalation in customer complaints going forward if no contingency is available.	We have regular discussions with Access Trafford about the service they provide and how we can best work together. Also, please see the answer above.	No change.
Initial question from member of Parking Services	Whilst the overall proposal combined with the changes in the Environment Enforcement proposal is set to provide savings of £170,000 the decommissioning of the Community Safety Patrol Service has already achieved some of those saving, therefore I would like to suggest it would be in the best interest of our service to invest in bringing an additional member to the administration team and not to make a redundancy at this stage of the proposals.	The proposal to reduce from 5.1 to 3.1 Parking Assistant and Prosecution Support Officer posts has been reviewed following feedback from Parking Services. It is agreed that the overall reduction of 2.0 FTE posts could risk the loss of PCN income. It is now proposed that there will be 4.1 Enforcement Support Assistant posts in the new structure.	Accepted

3. Service Structure			
Source	Key Point(s)	Response	Change
	Who will respond to the various offences?		
Initial submission by Environmental Enforcement Team	<p>The following questions, or similar, were asked in respect of the various offences:</p> <ul style="list-style-type: none"> -who will respond to the calls received regarding [offence type]? -who will issue FPNs? -who will prosecute offenders? 	<p>The Council recognises that answering and responding to calls often does not actually address the root cause of the calls and that often a more strategic preventative approach is more effective: both reducing the number of offences and calls from residents. There is insufficient evidence to suggest that the existing patrolling approach, with the aim of enforcement of these areas, is effective in reducing offence or changing behaviour. The Council is proposing a more proactive and preventative approach through community engagement using the Locality model, and more co-ordinated and targeted working between Council services and occasionally other local provisions such as the GMP.</p>	No change
	Alternative Structures Proposed		

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<p>Initial submission by Environmental Enforcement Team</p>	<p>Alternative approach to Environmental Enforcement - The Business Case document only shows savings in staffing costs, and does not account for savings in running costs (vehicles, fuel, communications, back office costs). These have been estimated at approximately £40k, with a slimmed-down team of 4 staff, in the new proposal. This shows that savings of almost £150k can be made, whilst maintaining a Safer Communities Patrol Team of 4 staff. This compares to the proposed £170,000 saving outlined in the Business Case.</p>	<p>The costings in the Trafford business case form a part of the wider enforcement review. Any new proposal needs to remain firmly within the business case costs. The consultation response proposal would leave a budget shortfall of £122,000 as it basically adds four full time employees with no proposal on how this might be funded. It should be further noted that the savings in running costs, highlighted in your alternative proposal have already been taken into consideration within the enforcement review and our report clearly shows this.</p>	<p>No change</p>
	<p>Alternative models for Parking:</p>		
<p>Initial submission by member of Parking Services</p>	<p>1. Increase proposed admin levels by: 1FTE x Enforcement Support Officer (temporary) 1FTE x Enforcement Support Assistant (temporary).</p>	<p>There is no guarantee that by retaining the two posts all of the outstanding FPN income would be recovered. This proposal is rejected.</p>	<p>No change</p>
<p>Initial submission by member of Parking Services</p>	<p>2. Short term pilot for APCOA to deliver Litter and Dog Fouling Fines (in addition to PCN's) + retain admin staffing levels as outlined above.</p>	<p>The Council's position with regard to the future issuing of FPN's has been already stated in the Consultation Document. This proposal was rejected.</p>	<p>No change.</p>
<p>Initial submission by member of Parking Services</p>	<p>3. Implement the proposed staffing changes, writing off the FPN debt outstanding. Plus one additional Enforcement Support Assistant.</p>	<p>The proposal to reduce from 5.1 to 3.1 Parking Assistant and Prosecution Support Officer posts has been reviewed following feedback from Parking Services. It is agreed that the overall reduction of 2.0 FTE posts could risk the loss of PCN income. It</p>	<p>Accepted</p>

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		is now proposed that there will be 4.1 Enforcement Support Assistant posts in the new structure.	
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