



## Full Business Case

### Proposal to create a joint Trading Standards Service between Buckinghamshire County Council (BCC) and Surrey County Council (SCC)

#### Executive Summary

This business case summarises the benefits of creating a new Joint Trading Standards Service between Buckinghamshire and Surrey.

This will provide an enhanced service for residents and businesses in both counties, whilst also delivering the savings required in the Medium Term Financial Plans for each local authority and putting the Joint Service in a stronger position to generate further income in future years. The cashable savings equate to approximately 12% of the joint service costs by year 4. The alternative for each service would be to make service delivery reductions which in turn would reduce protection for residents and support for local businesses.

The new combined service would be based on the strongest partnership option, by being overseen by a new Joint Committee comprising Cabinet Members from both Buckinghamshire and Surrey. The Joint Committee will set the strategic direction of the Joint Service linked to the priorities of each partner Authority. Staff will be employed by the host authority, Surrey, to enable some of the management savings to be delivered. Continued local presence and local partnerships are vital for the success of the service. The new service will be delivered from the existing locations within each county. There are no plans to centralise or re-locate staff. The service will continue to be locally accessible and able to identify and address local issues.

The Joint Committee model will be underpinned by an 'Inter Authority Agreement' (IAA) setting out the legal arrangements for the partnership. All contributions, costs, savings, additional income etc will be split proportionately between the two partner authorities to ensure fairness. The Joint Committee model keeps the Joint Service within the Local Authority sphere, with the advantage that any additional income or savings beyond that identified in this business case would stay with the partner authorities.

The proposal will create a service better able to meet its statutory responsibilities, to achieve more to support corporate priorities in both Councils, and better positioned to deal with the new regulatory and consumer protection landscape. Building on the strengths of the current services, it will provide enhanced resilience and capacity to

tackle unforeseen challenges and peaks in demand such as large scale investigations, complex frauds or animal disease outbreaks. It will continue to focus on protecting the most vulnerable and supporting businesses. It will be more influential regionally and nationally and have an enhanced capacity to generate income and future growth through the delivery of services for businesses and for other local authorities.

The new service will, subject to Cabinet approval in both local authorities, be operational in April 2015.

## **1. Background and Reasons**

### **1.1. Business Need**

Trading Standards is a critical and complex Service, with a legislative duty to enforce some 80 Acts of parliament and hundreds of sets of subordinate Regulations across a wide range of issues from fair trading, fraud and scams, through consumer safety, health and wellbeing, to the health and welfare of animal livestock.

The Trading Standards Service also supports the delivery of a wide range of Council priorities including Public Health, economic growth and the protection of vulnerable residents.

The national landscape for consumer protection is changing rapidly with more focus on cross border issues and new national bodies such as the National Trading Standards Board becoming more significant in national, regional and local delivery.

In the present economic climate there is a need to show increased efficiencies and value for money in both Buckinghamshire County Council (BCC) and Surrey County Council (SCC). Significant efficiency savings have been delivered over several years by the services in both Councils. The options for further efficiency savings without damaging impacts on service delivery have been exhausted. The ongoing need to make savings means that we need to look for new opportunities and to new models of delivery.

### **1.2. The Opportunity**

Trading Standards has been identified as a function where there is potential for a joint service delivery model. There are already a small number of existing examples elsewhere that have been shown to work including in Devon & Somerset; West Berkshire & Wokingham and West Yorkshire Joint Services. The new joint service will be at the forefront of the development of shared services for front line regulatory functions. We will learn from others to avoid some of the potential pitfalls.

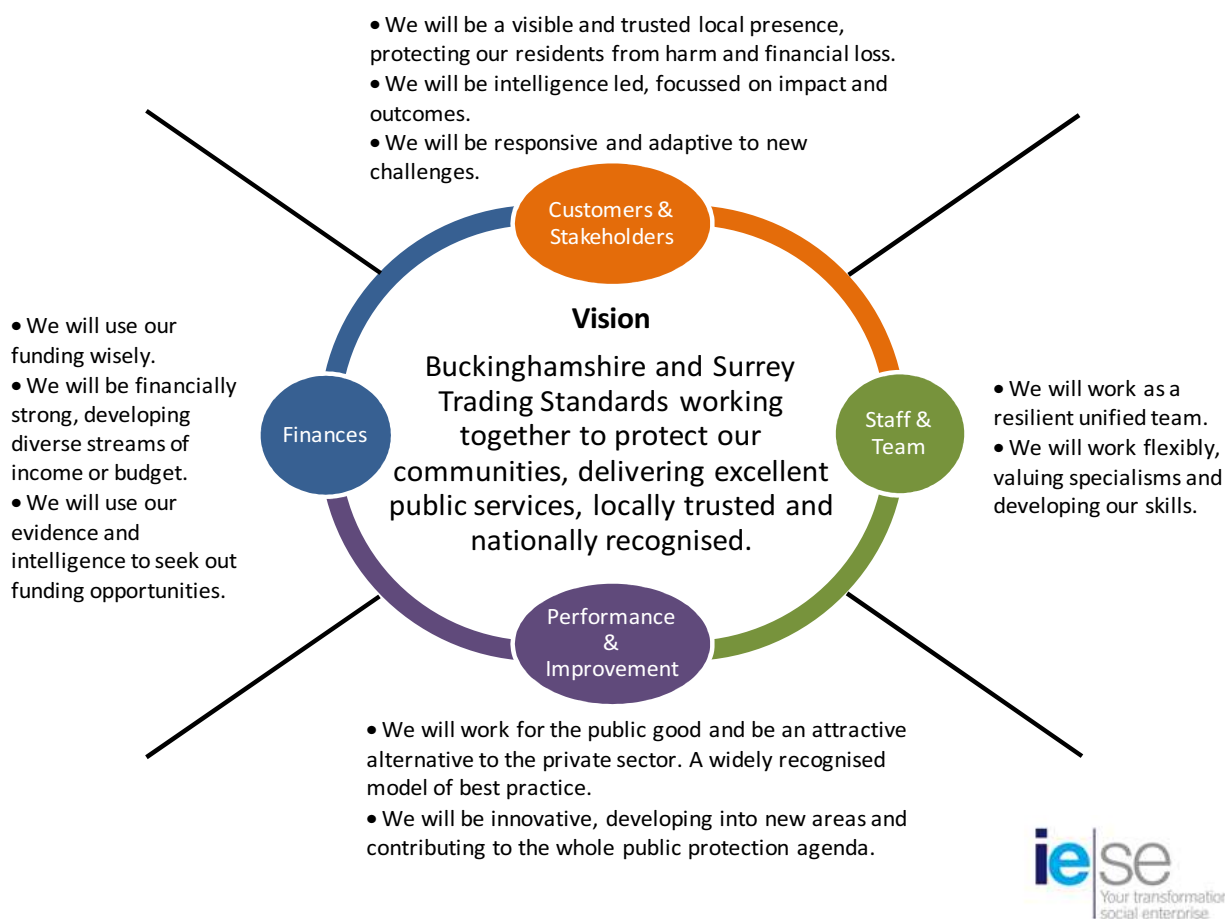
BCC and SCC have similar political, strategic and operational ethos so they are ideal candidates for a Trading Standards joint service. Both local authorities have been keen to work together at officer and member level to develop this opportunity. The new joint service would continue to provide a locally responsive and visible service for our residents and businesses with additional benefits outlined in section 3.

### 1.3. Development Work to Date

A joint Project Board has been established involving the Cabinet Member for Community Engagement for BCC, Cabinet Member for Customer and Communities SCC, and senior officers from both authorities. The Board has monitored the project performance and provided strategic guidance and direction.

The Board has decided that the key design principle of the new joint service is continued support of delivery of both Councils' priorities. Draft service priorities have been developed and support the current corporate and strategic priorities for example public health, economic growth and protecting the most vulnerable residents. (See **Appendix A**). As each local authority develops its priorities the Joint Committee will agree the required strategic direction of the joint service to ensure that it appropriately assists in delivering any new priorities.

Critical to the success and sustainability of the new joint service will be the vision and values that have been developed in consultation with the Board. The vision and values are illustrated below:



## 2. Business Options

### 2.1. Delivery Model

The Project Board has considered a range of different options for the potential delivery of a joint service including:

- Joint Service overseen via Joint Committee
- Joint Service – delivered by one lead authority with a joint service review panel.
- An external vehicle with Charitable Status
- Private Sector Outsourcing
- Retain Current Model

Several of the alternatives are as yet untried and unproven as delivery models for regulatory and enforcement services. In order to ensure that we can deliver something successful, within a reasonable timescale the Project Board has focused on the first two alternatives in more detail. Further information is provided in **Appendix B**.

In order to ensure a true partnership approach is taken forward, rather than a contractual relationship, the Project Board recommends the Joint Committee model for oversight of the new service.

This will require the creation of a new Joint Committee. The Joint Committee will comprise one Cabinet Member from each partner authority, together with another member from each who may attend regularly in an optional advisory and supportive capacity but who would not form part of the Joint Committee itself. The Joint Committee will be responsible for overseeing the service delivered to residents in both counties and ensuring local priorities and views from both areas are fully and equally considered. This will be delivered by a single, joint service hosted by one authority, but not co-located in that authority.

The partnership will be underpinned by an Inter-Authority Agreement setting out the legal arrangements for the partnership, including the performance measures by which the performance of the joint service will be assessed. This Agreement will set out the main terms of the partnership and identify how risks and liabilities will be shared between the Authorities. It will also contain provisions for dealing with any disputes, should these arise.

In summary, this approach would ensure that both governance and accountability are clearly retained by the partner local authorities.

The recommended governance model allows the potential for future growth of the Joint Service. A strategy for future growth is being developed by the Project Board and principles are summarised in **Appendix C**.

## 2.1. Staffing Options

Consideration has been given to the most appropriate staffing model and in particular whether staff should be transferred to a single employer.

The benefits of having one host employer and hence one set of systems and processes to operate under are:

- The new service will benefit from the support services within one local authority and hence deal with one set of corporate systems and processes
- Being employed by a single local authority will reduce procurement costs for a range of support and technical costs for example IT database, Legal and technical services.
- The efficiencies and time savings that result for managers will enable the joint service to make savings in management costs which would otherwise not be achievable.

The long term nature of this proposal means that secondment of staff into the host authority is not a suitable option. Therefore it is proposed that the 24 (currently) affected Buckinghamshire County Council staff would transfer to the employment of Surrey County Council at the start of the Joint Service in accordance with TUPE<sup>1</sup>.

Under TUPE, staff transfer with their existing terms and conditions of employment. The transferred staff are also protected from suffering any detriment because of the transfer unless there is an “economic, technical or organisation reason” to make such changes and they are applied in a fair manner.

## 3. Benefits “Stronger Together”

### Benefits for Residents and Businesses:

The potential benefits have been grouped into three categories

- Service Efficiencies & Enhancements
- Financial Savings;
- Income Generation Opportunities

The key elements that demonstrate the value of a joint service are shown as A to F below. **Appendix E** provides more detail of how these benefits will be delivered in practice. It should be noted that whilst efficiencies will be made, these do not generally equate to a reduction in employee headcount (with the exception of one management post) because this resource will be redeployed to enable the Joint Service to generate the income anticipated.

- A.** Sharing expertise and best practice and creating greater resilience and robustness to cope with unforeseen challenges, such as animal disease

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<sup>1</sup> Transfer of Undertakings (Protection of Employment) Regulations 2006

outbreaks, large scale investigations, complex frauds, or illness or loss of key officers and their specialist technical knowledge.

- B. Sharing resources, including IT and databases, intelligence and specialist financial, legal and other roles that can cover the wider service area more economically.
- C. Eliminating duplication by needing to do things once rather than twice in two different places e.g. Enforcement Policies, Enforcement Concordat, RIPA, Funding Bids etc.
- D. Building on the successes and innovation within the current services to maximise the potential benefits e.g. income generation from business services, systems thinking, developing volunteering, maximizing prevention through social media and other means helping to further enhance the local reach and impact of the service.
- E. Reducing costs by operating jointly.
- F. Creating a significantly larger profile collectively for BCC and SCC TS on the regional and national scene, having greater influence on professional direction and policy making processes, improving opportunities to benefit from funding and developmental initiatives and **increasing income generation**, particularly through extending Primary Authority Partnerships.

### **Examples of Trading Standards work that will benefit from Service Efficiencies & Enhancements**

Both authorities prioritise support and protection activities to vulnerable people and this will remain a primary focus for the joint service. There is well established evidence<sup>2</sup> that enhanced support to vulnerable people helps improve their quality of life and reduces the likelihood of their becoming more dependent upon secondary and tertiary support services (which can be at a significant cost to the local Council). A key element in this is the sense of security delivered by improved community safety, of which Trading Standards activity contributes. The sharing of expertise and improved service availability and effectiveness will enhance the impact in both authorities.

Both authorities ensure that the goods, services and food bought by residents is safe, meets minimum legal standards and descriptions and claims made are not deceptive or misleading. In doing this, Trading Standards protects everyone, makes communities safer, improves health and supports the local economy by protecting legitimate businesses and local residents from unfair trading practices. In carrying out its role, and planning activities Trading Standards is intelligence-led, relying on robust information to target activity where it will achieve the greatest results. By combining our specialist skills and knowledge the impact will be greater.

**Appendix D** contains case studies which also help illustrate the breadth, depth and impact of Trading Standards work, demonstrating how it:

- protects vulnerable consumers from scams
- supports local businesses and the local economy
- protects children from death or serious injury

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<sup>2</sup> “Support. Stay. Save.” Alzheimer’s Society 2011

- tackles food fraud

In these areas, and in others, the shared resources of a joint service can enhance the overall impact.

### Summary of Anticipated Financial and Income Benefits

The combined partnership is expected to deliver cost savings and additional income of £129,000 in the first year of operation, rising to £396,000 per annum by year 4.

<b>Cumulative changes to base budget compared to current year</b>				
	<b>Year 1 (2015/16)</b>	<b>Year 2 (2016/17)</b>	<b>Year 3 (2017/18)</b>	<b>Year 4 (2018/19)</b>
<b>Financial Savings</b>	£94,000	£191,000	£221,000	£231,000
<b>Income Generation</b>	£35,000	£85,000	£140,000	£165,000
<b>Total:</b>	<b>£129,000</b>	<b>£276,000</b>	<b>£361,000</b>	<b>£396,000</b>

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### Developing our Commerciality for the Future

One of the aims of this project is to become more commercially minded and position the Joint Service so that it is better able to generate additional income in the longer term to help protect front line service delivery. To enable this, an early piece of work will be to develop a commercial strategy for the new joint service.

If options arise where investment could lead to a longer term saving, in excess of the investment, these will be considered and responded to as circumstances allow.

One example of success on which we will build is expanding the numbers of Primary Authority Partnerships with local businesses. Such Partnerships assist and support businesses trading regionally and nationally, and also generate additional income for the Service. Such partnerships have grown from only 3 in 2011 to 35 currently in Surrey. The growth in Buckinghamshire has been more modest to date but there is a strong experience and knowledge base in the shared service on which to build for the future.

## 4. Financial Business Case

### 4.1. Joint Service Delivery Implementation

In the development and implementation phase (occurring during the 2014/15 financial year) the main costs are for: External Project Management resource (through IESE); IT transition costs; Legal advice and development of the legal agreements to underpin the Joint Service; TUPE agreement; preparation of personnel files prior to TUPE transfer and officer time. These costs are being shared by both Local Authorities from within existing Service budgets. Excluding officer time, these costs are estimated to be just over £50,000.



The partnership will deliver cost savings and additional income of £396,000 per annum by the fourth year of operation. The provision of new network capability to enable the teams to work together in a seamless manner will add new costs, estimated at £5,000 per annum. Implementation costs are fully offset by the first year savings.

## 4.2 Income and Costs Sharing Principles

The Joint Project Board proposes that the net cost of the partnership will be divided in the proportions agreed in the underpinning Inter-Authority Agreement (IAA) of 66% / 34%, which is in the same proportions as the Financial contribution to the Joint Service at the outset. This is particularly important in regard to income from business services provided, as it will help to drive the joint service approach to working and generating income to the benefit of the new service regardless of where a business might be based (either within BCC, SCC or any other authority area).

The table below provides a summary of the financial arrangements for the partnership:

- the combination of the base budgets for the service from each authority (including standard budgeted inflation used by each authority to allow for increases in staff costs),
- The addition of new costs incurred in relation to IT networks,
- Reductions in the budget to reflect the delivery of cost savings and additional income.
- The apportionment of the net budget in the proportions determined by the IAA, to each authority.

BCC & SCC Joint Trading Standards	2015/16	2016/17	2017/18	2018/19
Prior Year Budget: SCC	2,065			
Prior Year Budget: BCC	1,123			
Prior Year Budget: Partnership		3,116	3,021	2,986
Add Inflation	52	52	50	50
Additional Costs (IT Networks)	5			
Cost Savings	-94	-97	-30	-10
Additional Income	-35	-50	-55	-25
<b>Budget Per Annum</b>	<b>3,116</b>	<b>3,021</b>	<b>2,986</b>	<b>3,002</b>

Apportionment	2015/16	2016/17	2017/18	2018/19
SCC	2,057	1,994	1,971	1,981
BCC	1,059	1,027	1,015	1,021
<b>Budget Per Annum</b>	<b>3,116</b>	<b>3,021</b>	<b>2,986</b>	<b>3,002</b>



### 4.3 Comparison to the Medium Term Financial Plan (MTFP)

The partnership arrangement will deliver cost savings and additional income that achieve the expected existing Medium Term Financial Plan targets for both parties. Achieving these savings will however take longer than that assumed in the existing MTFP, but will not result in service reductions which might otherwise have been the case.

Table a) below demonstrates how the shared cost of the service compares to the existing MTFP.

#### a) Partnership Budget Apportionment

SCC	2015/16	2016/17	2017/18	2018/19
MTFP	2,056	1,897	1,937	1,977
Partnership Apportionment	2,057	1,994	1,971	1,981
Variance	1	97	34	4

BCC	2015/16	2016/17	2017/18	2018/19
MTFP	1,054	1,036	1,046	1,057
Partnership Apportionment	1,059	1,027	1,015	1,021
Variance	5	-9	-31	-36

Table b) below demonstrates the savings (and income) achieved for each authority from the partnership arrangement compared to MTFP targets.

#### b) Savings Achieved

SCC	2015/16	2016/17	2017/18	2018/19
MTFP Savings	-50	-250	-250	-250
Partnership Savings	-49	-153	-216	-246
Variance	1	97	34	4

BCC	2015/16	2016/17	2017/18	2018/19
MTFP Savings	-80	-109	-109	-109
Partnership Savings	-75	-118	-140	-145
Variance	5	-9	-31	-36

## 5. Timescale

- |  |                     |
|--|---------------------|
| 1. BCC and SCC Cabinet approval        | October 2014        |
| 2. Consultation with BCC staff re TUPE | November – December |
| 3. Legal agreements in place           | February 2015       |
| 4. Joint service fully in operation    | April 2015          |

## 6. Known Risks

As part of the project management approach analysis has been undertaken to identify and assess risks. A robust Risk Management framework (see the Risk Register contained in **Appendix F**) has been put in place to create risk responses and action plans and to ensure that any risks identified are actively monitored and responded to.

The most significant risks that have been identified and escalated to the Project Board include:

- One of the Partners withdraws from the Project, resulting in the Joint Service not being implemented and existing relationships (e.g. the management teams) being severed
- A failure to effectively engage with TS staff, results in resistance to change and potential Trade Union intervention
- Incompatibilities of IT systems (or other technical aspects of the two services) results in project slippage, inefficient work-arounds or additional systems (or technical support) investment being required.

## 7. Supporting Documents

This Business Case is supported by a number of documents listed below.

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|--|---------|
| • APPENDIX A: Draft Service Priorities                 | Page 11 |
| • APPENDIX B: Comparison of possible Governance Models | Page 13 |
| • APPENDIX C: Options for Future Growth                | Page 15 |
| • APPENDIX D: Case Studies                             | Page 17 |
| • APPENDIX E: Anticipated Benefits Analysis            | Page 21 |
| • APPENDIX F: Risk Register                            | Page 27 |

### Additional Supporting Documents:

- Equalities Impact Assessment

## Draft Service Priorities

### Protection

- Contribute to tackling relevant local crime and disorder priorities
- Tackling the issues causing greatest harm (to the most vulnerable residents)
- Be the consumer champion for the local area, especially for the most vulnerable in the community.

### Supporting prosperity / economic growth

- Supporting good local businesses to thrive
- Encouraging compliance of local businesses and responding appropriately to non-compliance to maintain a fair trading environment and ensure crime doesn't pay
- Supporting the rural economy

### Supporting Public Health

- Protecting people from harmful products (including food) and services.
- Enabling healthier choices
- Enhancing the health and wellbeing of local residents
- Supporting relevant priorities identified by the local Joint Strategic Needs Assessments (JSNA's)

### Innovation

- Developing approaches to enhance services, increase impact and reduce cost to improve service effectiveness

### Customer Focus

- Identifying the issues affecting local people including those who are hard to reach and focusing resources on those causing most harm, especially to the most vulnerable
- Communicating well with local people

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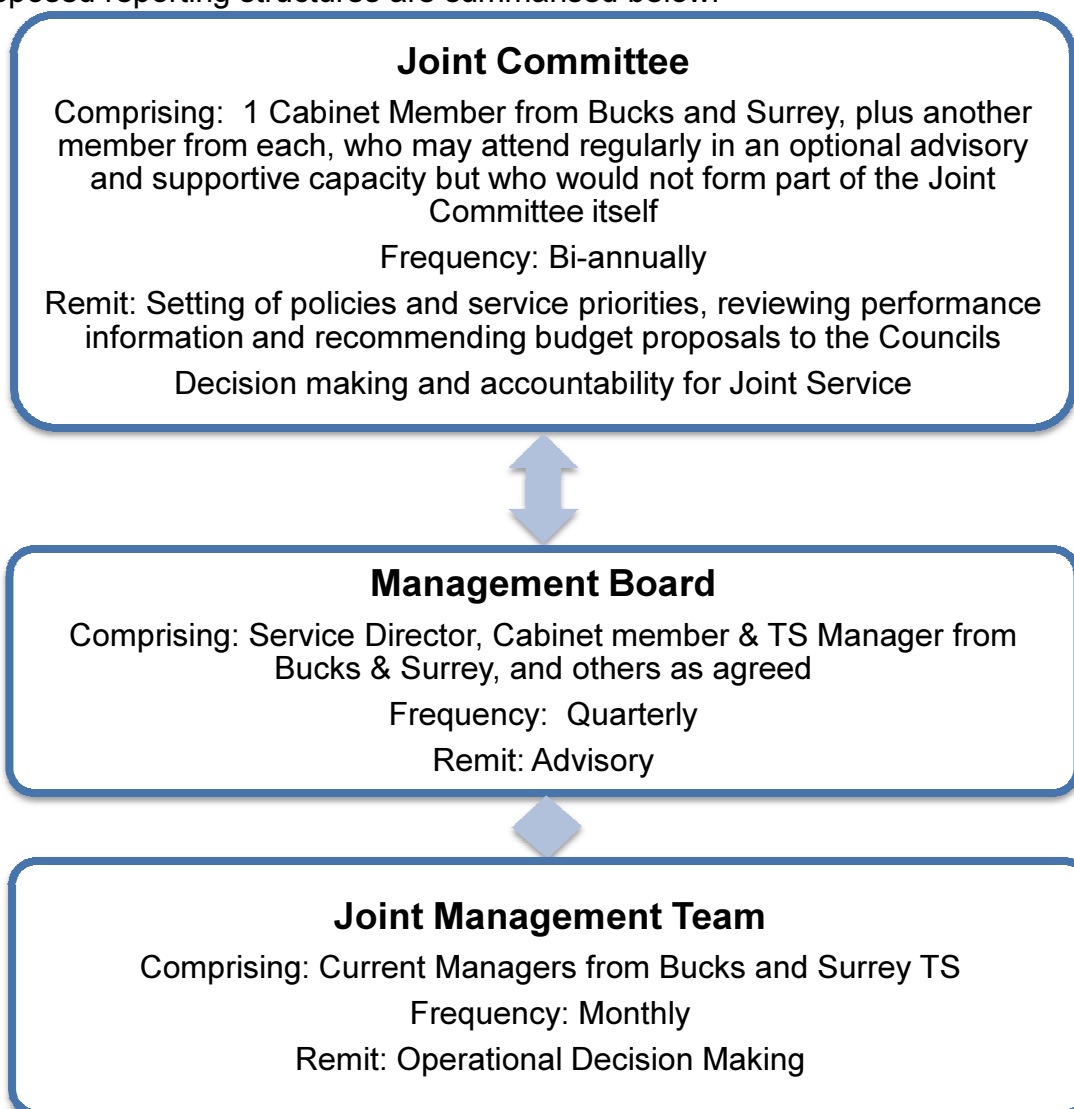
## Comparison of Governance Models

In order to ensure a true partnership approach, rather than a contractual relationship, the Project Board recommends the Joint Committee model for oversight of the new service.

A new Joint Committee comprising 4 elected members i.e. the Cabinet Member and one other Cabinet Member from each Local Authority will be established. The Joint Committee will be responsible for the service delivered to residents in both counties.

This approach would ensure that both governance and accountability are clearly retained by the partner local authorities. Business Plans and Annual Reports will be available to the relevant Select Committees and Cabinets in both authorities.

The proposed reporting structures are summarised below:



**Additional Scrutiny:** The existing **Select Committees** in Surrey and in Buckinghamshire would both continue to exercise a Scrutiny role for the new Joint Service.

## Appendix B – Comparison of Governance Models

Joint Committee (JC)	Lead Authority with Joint Service Review Panel
<p>Explanation: A formal arrangement created through Section 101 and 102 of the Local Government Act 1972. The Joint Committee allows two or more LAs to discharge any of their functions jointly. Both Surrey CC and Bucks CC delegate functions to the Joint Committee. Underpinned by a legally binding Inter-Authority Agreement</p>	<p>Explanation: One authority delegates its Service responsibilities to the other (lead) authority through a Section 101 agreement.  Underpinned by a legally binding Inter-Authority Agreement</p>
<p><b>Key Points:</b> The JC comprises 2 Cabinet Members from Surrey CC and 2 Cabinet Members from Bucks CC. These do not need to be politically balanced. There is a rotating Chair who has the casting vote. Others may attend but only permanent members may vote. The JC will meet twice a year and meetings are held formally under the Local Government Act. Decisions of the JC are binding on both LAs, insofar as authority has been delegated to it by the LAs to make such decisions.  The JC is not a legal entity in its own right and therefore one authority becomes the host for staffing and joint contractual matters but their liability is shared by a contractual Inter Authority Agreement.  Sitting below the JC is a Board which meets quarterly to oversee running of the Service (views performance information, reviews budget position etc). The Board comprises Officers and Members of both LAs (it's make up can be stipulated by us). Meetings do not have to meet the requirements of the Local Government Act.  Decisions on prosecutions remain with the</p>	<p><b>Key Points:</b> Formal Decisions are made by the Lead Authority in its current decision making structure – i.e. Cabinet Member. Sitting below the formal decision making structure there is a Joint Service Review Panel, comprising Members and Officers from both LAs. Recommendations are made by the Review Panel to the Lead Authority. These recommendations are not binding, however.  The Lead Authority is also the host authority for staffing and joint contractual matters. Liabilities are shared by the contractual Inter Authority Agreement.  Greater long term consistency in application of policies as the decisions are only being made in one place.  Dissolvable at any time but the</p>

<p>individual authorities. Whilst there is reasonable consistency now, it doesn't prevent inconsistency of application in the future.</p> <p>Dissolvable at any time but the underpinning Inter-Authority Agreement stipulates notice periods prior to dissolution and a 'lock-in' period.</p>	<p>underpinning Inter-Authority Agreement stipulates notice periods prior to dissolution and a 'lock-in' period.</p>
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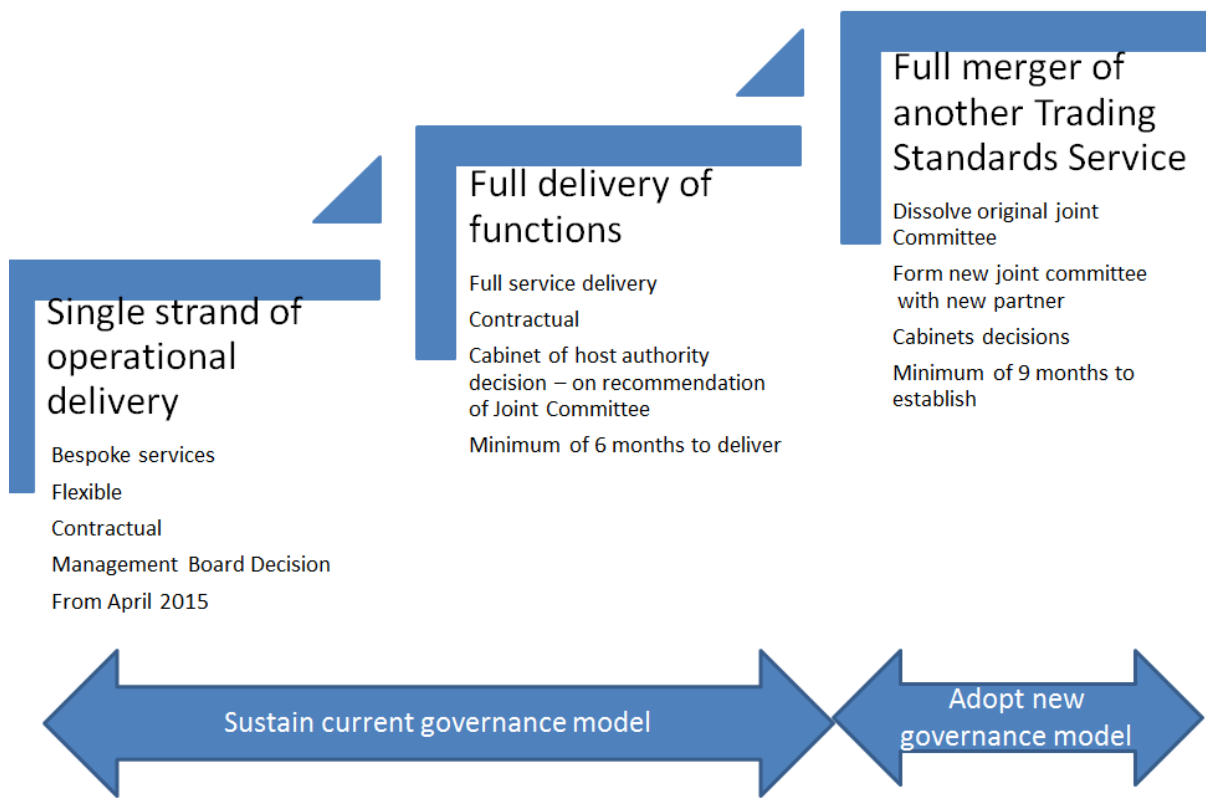
**Options for Future Growth**

A new joint Trading Standards service would provide a strong foundation for future growth. This would help further enhance the ability of the service to deal with local, regional and national concerns and to enhance efficiency through reducing unit costs further. Growth can come from delivering more services for businesses or from delivering services for other local authorities or regulatory partners.

In relation to the delivery of services for other local authorities growth would mean expanding outside of our current geographic boundaries.

The model that is recommended for the delivery of the new shared service enables such future growth in several ways.

**Options For Future Growth**



**Single strand of Operational Delivery**

The Joint Service can offer bespoke services, delivering specific functions or activities on behalf of other local authority services or other organisations on a contractual basis. For example the delivery of an Animal Health function, or a business advice service for a local authority, or to deliver a major investigation or initiative for a national body such as the Food Standards Agency or the National Trading Standards Board. These services would be flexible in terms of volume and time to take into account the specifications of the 'client'; the impact on core service delivery; and the capability of the Joint Service to deliver.

The decision to provide these functions would be made by the Management Board. The provision of functions in this way could be delivered from April 2015.

### **Full delivery of functions**

The Joint Service can be contracted by another local authority to deliver a complete regulatory service, for example the delivery of a complete Trading Standards (and / or Environmental Health) service.

The decision to provide complete services would be made by the Cabinet of the host authority, following a recommendation of the Joint Committee.

The provision of complete services could be considered from April 2015. It is anticipated it would take a minimum of 6 months to put the necessary contractual legalities in place.

### **Full merger of another Trading Standards Service**

The Joint Service can create a new partnership with another local authority to deliver a new larger joint service. This would be overseen by a newly constituted Joint Committee including membership from the new partner authority.

The decision to enter into a new partnership arrangement such as this would need to be made all Cabinets entering into the partnership.

It is anticipated it would take a minimum of 9 months to establish the necessary governance arrangements for any new Joint Service.

## Case Studies

### Case Study 1 – Protecting Vulnerable Consumers From Scams

In 2013, Surrey Trading Standards Service became one of the first to sign up to the work of the 'National Scams Hub' funded by the National Trading Standards Board.

It all started when the City of London Police intercepted a list of names and addresses of potentially vulnerable consumers who might be susceptible to invitations from scam companies to send money for 'free' gifts or to claim large cash prizes. About 1,000 of these lived in Surrey and Trading Standards Officers identified the most vulnerable through data already held and a new questionnaire.

A list of around 80 high priority Surrey residents was drawn up and officers visited each home personally. In most cases, these residents were sending off cash regularly to scam companies but receiving nothing in return. To help them resist these approaches Surrey Trading Standards used material from the national scam charity 'Think Jessica' combined with in-house publicity.

Our media breakthrough came in the form of an elderly Farnham resident, Sylvia Kneller, who, we discovered, had sent more than £200,000 over 50 years to scam companies. Sylvia agreed to let us highlight her case in the media to educate others in a similar position. The resulting full front page story in 'The Sun' generated a huge media response, which provided an opening to reach other potential victims with our key messages. As a result, Sylvia has been recognised with a Trading Standards Institute 'Hero Award', presented at the national TSI conference in Harrogate.

Surrey Trading Standards have also now produced an innovative 'Scam Sticker Pack' to help other vulnerable consumers and are sharing information with Buckinghamshire and other services where new victims are identified.

#### **How will a joint service help protect vulnerable residents from Scams such as this?**

We will share best practice from each existing authority, building on what works well.

We will have an enhanced intelligence capacity to help identify and respond to issues and protect and alert potential victims.

We will have an enhanced enforcement capacity, together with the specialist skills required to support vulnerable victims and to bring perpetrators to justice and to tackle serious frauds.

We will be better placed to seek additional funding from national bodies such as the National Trading Standards Board to tackle examples of serious cross border scams and frauds.

## Case Study 2 – Supporting Local Businesses and the Local Economy

In January 2013, Surrey Trading Standards had 5 Primary Authority partnerships, which are recognised partnerships with businesses to enable them to receive assured advice. Through a concerted campaign, by June 2014 we had established 33 partnerships, along with a co-ordinated partnership with the Association of convenience Stores.

We attribute our rapid growth to:

- Focusing on the needs of the businesses and demonstrating the benefits to them of a Primary Authority partnership.
- Creating flexibility in the offer – businesses can mix and match from range of options to obtain the services that most match their needs.

We initially offered a choice between Pay as You Go and Bespoke partnerships - all including trading standards, environmental health and fire safety elements via a multi-agency approach.

From listening to business feedback we added a Fixed Price package, including a set amount of advice for businesses that need to be able to quantify their commitment. And we'll be dividing Pay As You Go action plans into smaller projects with individual quotes.

One of the benefits of our Primary Authority partnerships is a Single Point of Contact option for regulatory services, and 11 of the 33 have chosen this option. Working with our Districts and Boroughs, not only is a single contact point easier and more appealing for businesses, but it enables us to manage overlaps of regulatory responsibilities and support for our fellow regulators. This saves time for all of us, and helps with promoting the scheme.

Closer working with other regulators has expanded to include a pilot with Surrey Fire and Rescue and we are currently rolling this out with 6 businesses seeking action plans for fire advice.

We also have a contract with our Public Analyst enabling us to submit samples on behalf of businesses and offer fixed prices for label checks for food and cosmetics.

### **How will a joint service help enhance services for businesses in Surrey and Buckinghamshire**

We will share these examples of best practice, using the skills and experience gained to date to offer enhanced services, on a cost recovery basis, to businesses.

### **Case Study 3 - Protecting Children from Death or Serious Injury**

In July 2012 Buckinghamshire Trading Standards became involved in the tragic investigation of a stone fire surround which had fallen and fatally crushed a 6 year old child. An experienced team were quickly assembled to work alongside the Police and HMRC to investigate what had occurred and to try to stop a similar event occurring in the future. The installer of the fire surround has pleaded guilty to failing to ensure the victim was not exposed to risks to her health and safety as he worked in her parent's home and has been sentenced to 8 months imprisonment.

The unique expertise and skills within Buckinghamshire Trading Standards enabled the team to focus on getting to the root cause of the event, which led to an investigation into understanding how safety measures could be improved. National Trading Standards Board funding enabled the commissioning of research with the Imperial College London to understand and recommend a safest installation method. As a result of this research and subsequent laboratory tests the National House Building Council (NHBC) have created new installation standards and the Stone Federation of Great Britain has updated their national guidance for installation of stone fireplaces.

Buckinghamshire Trading Standards drove a publicity campaign to raise awareness of potentially unsafe installations of stone fire surrounds to consumers throughout the County and further afield. Information on the safest installation method, reinforcement of the surrounds with mechanical fittings, was provided to consumers to ensure they were best informed.

#### **How will a joint service help protect children and reduce child deaths?**

We will have an improved intelligence capacity to help identify and respond to product safety issues.

The joint service will be in stronger position to secure additional funding from Government to identify and tackle child safety related issues.

The joint service will have wider shared and enriched expertise, together with an enhanced investigative capacity to deal with product safety issues.

## Case Study 4 - Tackling Food Fraud

In April 2013, in the wake of the horsemeat scandal Buckinghamshire County Council provided Trading Standards with an additional £50,000 funding to ensure food sold in Buckinghamshire, to consumers, was genuine.

By analysing intelligence and information over 250 samples were taken from areas where issues were most likely to emerge. These samples included the authenticity of fish species, olive oil, durum wheat, kebab meat and basmati rice and the presence of aflatoxin contamination (fungal poisons). Levels of colours and preservatives in soft drinks and excess levels of water in fruit juice concentrate were also checked.

Issues were found with incorrect information about what type of meat was in kebabs, excessive levels of benzoic acid in soft drinks and unsatisfactory levels of aflatoxins, along with some minor incorrect labelling. Trading Standards Officers are working with businesses in Buckinghamshire to ensure they comply with labelling requirements so that food is properly described.

This work enables us to help maintain the integrity of the marketplace by supporting legitimate businesses, protecting consumers and gathering information and intelligence about potential areas of food fraud. We have presented our findings through numerous TV and radio appearances and local and national newspaper articles. The Government have also sent officials from the Elliott review to speak with us to gather evidence for recommendations about how we can protect the integrity of food nationwide.

### **How will a joint service help ensure the integrity of the food chain and hence protect residents?**

The joint service will be in stronger position to secure additional funding from the Food Standards Agency and others for projects tackling food fraud and ensuring the integrity of feed and animal feedingstuffs

The joint service will have an enhanced investigative capacity to tackle food fraud and related issues.

A larger service with shared expertise will help to further develop and enhance healthy eating initiatives such as Eat Out Eat Well, helping to tackle childhood obesity and other diet related health problems.

## Anticipated Benefits Analysis

### 3.1. Financial Savings

Link to High Level Benefits	Theme	Potential areas for financial savings	2015-2016	2016-2017	2017-2018	2018-2019
B, E	IT	Server, Hosting, Support, Sharing Systems	£7k	£19k	£19k	£19k
C, E	Procurement	Joint Purchasing and Strategic Procurement/Commissioning, Subscriptions	£10k	£10k	£10k	£10k
A, C	TS Schemes	Eat Out, Eat Well (EOEW), Support with Confidence (SWC)	£10k	£20k	£30k	£40k
A, C, E	Management Costs	Saving as a result of 'do it once' activities – reduction in 1 FTE management post	£0	£75k	£75k	£75k
A, B	In-housing	Bringing back into the Joint Service the delivery of contracts currently outsourced	£0	£0	£20k	£20k
A, B, E	Consultant Costs	Reduction in spend on specialist consultants as knowledge and vacancy pressures can be shared by working flexibly across the service	£54k	£54k	£54k	£54k
E,	Testing / Sampling Pooled Budgets	Reduction in spend on testing / sampling by having more robust and shared intelligence processes	£10k	£10k	£10k	£10k
E	Equipment	Sharing specialist equipment e.g. householder cameras, PACE recording equipment	£3k	£3k	£3k	£3k
		<b>Total:</b>	<b>£94k</b>	<b>£191k</b>	<b>£221k</b>	<b>£231k</b>



### 3.2. Income Generation Opportunities

Link to High Level Benefits	Theme	Potential areas for financial savings	2015-2016	2016-2017	2017-2018	2018-2019
A, C, E, F	Primary Authority Partnerships	Better resourced, better promoted, wider range, potential to grow significantly. The new joint service could be a market leader here in a variety of business sectors, e.g. the food and petroleum sectors.	£10k	£30k	£50k	£65k
A, B, D, E	Chargeable Business Advice	This will generate income and/or free up resources to focus on real need/SMEs, subject to policy alignment on this.	£5k	£10k	£20k	£20k
F	Funding Bids	There will be capacity to develop more than single TS services and a joint service would be more attractive for potential funders, e.g. NTSB, Public Health, TSSEL, FSA etc.	£15k	£30k	£45k	£45k
F	Selling Services to other LAs	A joint service would provide an enhanced capacity to do so (inside/outside of TSSEL). An example could be selling Financial Investigator time.	£5k	£15k	£25k	£35k
		<b>Total:</b>	<b>£35k</b>	<b>£85k</b>	<b>£140k</b>	<b>£165k</b>

### 3.3. Service Efficiencies

These efficiencies will enable the cashable savings above to be realised i.e. by freeing up time we can re-deploy this time into income generating activities and other savings.

Link to High Level Benefits	Theme	Potential areas for efficiencies	2015-2016	2016-2017	2017-2018
C	"Do it once", day-to-day activities	Management Task (Performance, Budget, Risk, Health & Safety etc), Freedom of Information Act responses, Regulation of Investigatory Powers Act issues, Regulator's Code issues, Database issues, Education & Information materials. Development of Service indicators.	0 days	100 days	100 days
C	Alignment of TS Policies and Planning	Service Plan, Food & Feed Plan, Tobacco reporting, RIPA records & reporting	20 days	20 days	20 days
C, D	Social Media	Twitter, Facebook, TS@lerts via email	25 days	25 days	25 days
F	Media Profile	Enhancing media profile and hence preventative impact	10 days	10 days	10 days
B, C, D, E	Knowledge Sharing	Shared intelligence and Accredited Financial Investigator (AFI) resources	10 days	20 days	20 days
B, E	Resources	Shared specialist equipment	10 days	10 days	10 days
A, D, F	National TS Profile	Attendance / representation at external meetings e.g. TSSEL, one lead/link for each area rather than two attending each meeting	15 days	30 days	30 days
		<b>Total:</b>	<b>90 days</b>	<b>215 Days</b>	<b>215 Days</b>

### 3.4 Service Enhancements

These enhancements will improve the service provided to our local residents and businesses. In some cases, for example with volunteers, they allow us to provide valuable services which would otherwise not be provided.

Link to High Level Benefits	Theme	Potential areas for enhancement	2015-2016	2016-2017	2017-2018
C, D	Volunteers	Use of volunteers, both services developing this approach at present	200 days	400 days	400 days
A, C, D, E	Staff	Enhanced training, building staff competence and developing progression opportunities. Getting more for the money currently spent on training. Scope for delivering our own training but also gaining income from selling additional training places. Having cover for 'normal' work when officers are training.	Won't save days but gives an enhanced service which would increase the attraction to businesses considering buying our services and limit unnecessary staff turnover.		
A, B, E	Resilience	Improved resilience and flexibility to meet challenges and risks, e.g. animal disease outbreak, major investigations	Won't save days but leads to an enhanced service.		
A, B	Leadership	Shared management experience, competence and mutual support	0 days	30 days	30 days
		<b>Total:</b>	<b>200 Days</b>	<b>430 Days</b>	<b>430 Days</b>

### 3.5 National Assessment of the Impact of Trading Standards

In 2009 the Office of Fair Trading produced evidence which suggests that Trading Standards Interventions nationally are assessed as delivering direct savings of £347m to the UK economy. This equates to approximately a £6 return for every £1 spent on delivery of a Trading Standards service, details in the table below. This estimate is conservative because the evaluation does not include the impact of work undertaken by Trading Standards to inform and educate consumers generally about their rights, for example through leaflets, information packs and via websites.

<b>Estimated consumer savings and associated costs of TSS fair trading work across the UK</b>			
	Estimated Annual consumer savings	Estimated Annual TS costs	Benefit – Cost ratio
Tackling Unfair Trading Practices	£228m	£41m	6:1
Advising and Assisting Consumers	£119m	£17m	7:1
<b>Total</b>	<b>£347m</b>	<b>£58m</b>	<b>6:1</b>

In January 2014 the Department for Business Innovation and Skills produced an Impact Assessment drawing on evidence produced by the National Audit Office in July 2011. This estimated that 70% of consumer detriment is likely to arise out of activities which cross local authority boundaries. Evidence indicates the cost of this consumer detriment where offences occur across local authority boundaries is in excess of £4.8 billion.

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## Risk Register Extract

RISK ID	RISK DESCRIPTION (Cause & Impact)	CONTROLS (Response Plan)	POST RESPONSE: LIKLIHOOD / IMPACT
1	One of the <u>Partners withdraws</u> from the Project, due to a <u>lack of mutual agreement</u> around the Business Case and/or Inter Authority Agreement or wider political/financial pressures/tensions, resulting in the Shared Service not being implemented and existing TS ties (e.g. TSMT) being severed.	<ul style="list-style-type: none"> <li>- Ensuring that plans and key project documentation are developed in consultation with the SROs and with the Project Board (at a high level), to ensure operational and political interests are reflected</li> <li>- Engaging in early discussion about any potential "deal breakers" and ensuring that both parties have clarity on key issues (including checking that appropriate advice has been sought, e.g. legal/finance/HR)</li> <li>- Undertaking environmental analysis (PESTLE/SWOT) in order to identify and assess potential points of tension / areas that could cause this to happen and have in place risk responses and a robust communications plan.</li> <li>- Regularly reviewing escalated Risks &amp; Issues with the Project Board.</li> <li>- Involving a third-party to lead on managing the Project with both parties, to introduce impartiality, at the start of the project.</li> <li>- Receive external advice on TUPE (and other sensitive areas) to ensure that proposals are reasonable, robust and consistent with other practices in the market.</li> <li>- Engaging early with both Legal Teams and encourage them to co-design the MoU / IAA.</li> </ul>	Remote / Severe
2	A <u>failure to effectively engage with TS staff</u> , particularly around TUPE and Terms and Conditions, results in <u>resistance to change</u> , tensions between BCC and SCC staff and/or potential industrial dispute.	<ul style="list-style-type: none"> <li>- Good communications / Keeping staff informed through creation of Stakeholder Engagement and Communications (SEC) WG and robust Communications Plan, built on the foundation of analysis including SWOT/PESTLE at an individual level</li> <li>- Involving staff in design through WGs</li> <li>- Understanding points of tension / areas that could cause resistance</li> <li>- Inform Unions, understand what involvement they seek</li> <li>- Focusing effort on areas where resistance will most undermine the project</li> </ul>	Remote / Moderate
3	<u>Incompatibilities of IT systems</u> (or other technical aspects of the two services) results in project slippage, inefficient work-arounds and/or additional systems investment or technical support being required.	<ul style="list-style-type: none"> <li>- An IT Working Group (ITWG) has been created to scope and risk assess the IT alignment aspects of this Project and to plan the transitional steps from the present to future state</li> </ul>	Possible / Moderate
4	A <u>lack of required investment in essential IT</u> (e.g. databases, equipment, connectivity), infrastructure and other technical aspects compromises the delivery of the service standard and integration being sought.	<ul style="list-style-type: none"> <li>- A Systems Working Group has been created to scope and risk assess the IT alignment aspects of this Project and to plan the transitional steps from the present to future state.</li> <li>- Piloting and testing will be factored in to Phases 3/4 of this project, to try to identify any issues.</li> <li>- Any additional investment decisions will be assessed by the Project Board, who will be provided will full briefings on the problem, impact and a range of costed solutions.</li> </ul>	Remote / Significant
5	<u>Budget/resource reductions and/or unfavourable political decisions</u> relating to TS in either or both authorities result in adverse impacts or additional or changed demands, which will need to be factored in to the new TS JS Target Operating Model (TOM) design. <u>Dependencies</u>	<ul style="list-style-type: none"> <li>- Retaining awareness of financial situation in each authority (to predict and act quickly if adverse budget decisions are being considered)</li> <li>- Being clear to financial decision makers of the impact of reduced budgets (good use of intel and data)</li> <li>- Recommending that the TS are out of scope for the BCC "Future Shape" Programme, via the BCCTS JS Project Board representatives</li> <li>- Interdependent Programmes/Projects are being identified as part of the Business Case process, which will include review of plans and impact.</li> <li>- BCC/SCC Cabinet Members will be briefed about TS JS</li> </ul>	Possible / Significant

	<p><u>outside of the project (e.g. the 'BCC Future Shape' Programme, authority savings targets and/or any potential authority move towards outsourcing), lead to 'trade-offs' that affect project delivery and/or the quality of the resulting joint service, or may lead to the project being closed altogether.</u></p>	<p>throughout the project, so they are aware of what this project is aiming to do and when, so that they can consider this when planning other projects.</p> <ul style="list-style-type: none"> <li>- Continued relationship between HoS and their finance teams as part of the budget setting process</li> <li>- Awareness of outside projects and programmes to be continued throughout planning phase 3 and 4</li> </ul>	
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## EQUALITY IMPACT ASSESSMENT

### 1. Topic of assessment

<b>EIA title:</b>	Buckinghamshire County Council and Surrey County Council Trading Standards Joint Service Project
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<b>EIA author:</b>	(To end of July 2014): Ian Dewar, Policy Manager, Customers and Communities, Surrey County Council. (August onwards): Gina Green, Buckinghamshire Trading Standards
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### 2. Approval

	Name	Date approved
<b>Approved by<sup>3</sup></b>		

### 3. Quality control

<b>Version number</b>	V1.3	<b>EIA completed</b>	
<b>Date saved</b>	30 July 2014	<b>EIA published</b>	

### 4. EIA team

Name	Job title (if applicable)	Organisation	Role
Ian Dewar	Policy Manager	Surrey CC	Lead (to July)
Gina Green	Trading Standards Team Leader	BCC	Lead (post July)

## 5. Explaining the matter being assessed

<p><b>What policy, function or service is being introduced or reviewed?</b></p>	<p>The Trading Standards Services from Surrey County Council and Buckinghamshire County Council are seeking to develop a landmark first “strategic alliance” through creating a Joint Trading Standards Service. The development of a Joint Service will allow a positive approach to meeting increasing financial pressures and the new consumer protection landscape, including greater national focus on cross border issues. The suggested way forward sits well with considering alternative delivery vehicles and being more commercially minded.</p> <p>The work of Trading Standards ensures that the goods, services and food bought by residents is safe and meets minimum legal standards. The service ensures descriptions and claims made are not deceptive or misleading. In doing this, TS protects everyone, makes communities safer, improves health and supports the local economy by protecting legitimate businesses and local residents from unfair trading practices. In carrying out its role, and planning activities Trading Standards is intelligence-led, relying on robust information to target activity where it will achieve the greatest results.</p> <p>The full set of project documentation is under development and the key timeline dates for the project are:</p> <table border="0"> <tr> <td>Dec-Jan 2014</td> <td>Project Scoping</td> </tr> <tr> <td>Feb 2014</td> <td>Project Launch</td> </tr> <tr> <td>Mar 2014</td> <td>Project Governance Established</td> </tr> <tr> <td>Apr-May 2014</td> <td>Data Gathering and initial Engagement</td> </tr> <tr> <td>Jun 2014</td> <td>Business Case and Plans Drafted</td> </tr> <tr> <td>Jul 2014</td> <td>Agreement in Principle BCC / SCC</td> </tr> <tr> <td>Aug-Mar 2015</td> <td>Project Initiation &amp; Delivery</td> </tr> <tr> <td>Oct 2014</td> <td>Cabinet approval to progress</td> </tr> <tr> <td>Feb 2015</td> <td>Technical acceptance testing</td> </tr> <tr> <td>Apr 2015</td> <td>Full Launch of Joint Service</td> </tr> <tr> <td>Apr-Oct 2015</td> <td>Benefits Monitoring and Project Closure</td> </tr> </table> <p>(The full Project Plan is available from <a href="mailto:ggreen@bucksc.gov.uk">ggreen@bucksc.gov.uk</a>)</p>	Dec-Jan 2014	Project Scoping	Feb 2014	Project Launch	Mar 2014	Project Governance Established	Apr-May 2014	Data Gathering and initial Engagement	Jun 2014	Business Case and Plans Drafted	Jul 2014	Agreement in Principle BCC / SCC	Aug-Mar 2015	Project Initiation & Delivery	Oct 2014	Cabinet approval to progress	Feb 2015	Technical acceptance testing	Apr 2015	Full Launch of Joint Service	Apr-Oct 2015	Benefits Monitoring and Project Closure
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<p><b>What proposals are you assessing?</b></p>	<p>The proposal under assessment is the establishment of the joint service. The aims of this initiative are principally to:</p> <ul style="list-style-type: none"> <li>• Share expertise and best practice, enhancing the resilience and robustness of the service</li> <li>• Maximising benefits by building on successes and innovation</li> <li>• Reducing costs through operating jointly, sharing resources and eliminating duplication</li> <li>• Establishing a larger national and regional profile, whilst maintaining local presence and accessibility</li> <li>• Enhancing key services</li> <li>• Creating a sustainable model that allows further developments</li> </ul> <p>The principal aspects of the development of the joint service that require EIA consideration include:</p> <ul style="list-style-type: none"> <li>• Establishing the potential impact to staff terms and conditions (and benefits), in relation to any TUPE transfer arrangements and the impact of the TUPE process itself.</li> <li>• Sharing of IT systems, data and associated governance processes, including DPA considerations</li> <li>• Communications and media, both internal and external</li> <li>• Financial and planning frameworks, including compliance with transparency, scrutiny and political governance processes</li> </ul>																						

	<ul style="list-style-type: none"> <li>• Accessibility and range of services provided to businesses, partners and consumers</li> <li>• Resourcing and service priorities in relation to vulnerable people and other protected characteristics</li> </ul>
<p><b>Who is affected by the proposals outlined above?</b></p>	<p>Public and other stakeholders:</p> <p>There is no expectation that the development of the joint service will have any negative impact on the public facing service in either county. In particular there is no evidence at this point that there is an equalities impact to any of the protected characteristics. Rather, the potential to share and extend the range of activity, and the expected greater financial resilience arising from the initiative are more likely to yield a positive enhancement and greater protection of services from financial pressures. Both authorities prioritise support and protection activities to vulnerable people and this will remain a primary focus for the joint service.</p> <p>There is well established evidence that enhanced support to people, especially those who are vulnerable, enhances their quality of life and reduces the likelihood of their becoming more dependent upon secondary and tertiary support services. A key element in this is the sense of security delivered by improved community safety, of which Trading Standards activity is a key element. The sharing of expertise and improved service availability that the joint service will deliver, will enhance this impact in both authorities. This will deliver both personal and community benefits and, as a result, have a positive impact on the private and public economies.</p> <p>Staff:</p> <p>Existing staff will be affected to varying degrees by the proposals, primarily as a result of:</p> <ul style="list-style-type: none"> <li>• TUPE of staff from BCC to SCC (expected)</li> <li>• Some potential changes arising from convergence of terms, conditions and benefits</li> <li>• Developing a common policy towards career progression</li> <li>• Some recasting of individual roles and responsibilities to reflect the new joint service management and delivery need</li> <li>• Changes in processes and systems, requiring training and operational adjustments</li> </ul> <p>All aspects of the staff processes will be managed with full HR support and backed up with extensive consultative and communication activity. In many ways the joint service will be expected to bring positive benefits as a result of greater opportunities within a larger and more secure, and prestigious service.</p>

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## 6. Sources of information

### Engagement carried out

Regular communication and engagement has been undertaken with staff throughout the process, including:

- Update briefing and progress e-mails to Trading Standards staff in both authorities
- Discussion and internal staff meetings, leading to the development of FAQs
- Briefings at internal whole team meetings, delivered by senior managers from both authorities
- Joint staff conferences, held on 7 May and 16 July 2014, with further dates planned for September and later in the year
- Establishment of a shared space on the Trading Standards South East Ltd (TSSEL) website, with passcode access enabled for all staff, providing key documents, dates and chat / discussion streams
- Open invitation to all staff to contact the project management team or individual managers with queries or comments

Staff have also had the opportunity to become actively involved in the working groups developing specific strands of the project. There are currently seven of these, each with lead and membership drawn from both authorities' staff

Members have been kept informed through:

- Regular briefings between Portfolio Holders and Heads of Service
- Establishment of a Project Board including Portfolio Holders and Strategic Directors from both authorities
- Briefing and information sessions for informal Cabinet / Corporate Leadership meetings in both authorities, with dates set for Select Committee (July) and Cabinet agendas (October)

Public and partner engagement has been informal and limited to date but a newly convened working group will be developing and delivering a programme of internal and external Communications to raise the profile of the project and the joint service itself

### Data used

Detailed service data is being collated and analysed by the working groups as part of the work to develop options and define the Target Operating Model for the joint service. As the detailed models for implementation develop over the project, evidence and proposals will be assessed for their potential equalities impact and, where appropriate, further EIAs may be undertaken. It is expected that this is only likely to occur in relation to staff terms and conditions (and benefits), including TUPE.

The data included here provides a breakdown on the existing staffing of the two existing services, and also an overview of the census data for the two counties.

**1. Staff numbers and characteristics**

		BCC	SCC
<b>No. of staff:</b>		25	50
<b>Gender</b>	<b>F</b>	57.7%	61.1%
	<b>M</b>	42.3%	38.9%
<b>AGE:</b>	<b>20-30</b>	7.7%	9.3%
	<b>30-40</b>	30.8%	20.4%
	<b>40-50</b>	26.9%	33.4%
	<b>50-60</b>	30.8%	35.2%
	<b>60-70</b>	3.8%	1.9%
<b>Work pattern</b>	<b>F/T</b>	69.2%	88.0%
	<b>P/T</b>	30.8%	12.0%
<b>Race / Religion / Sex / Sexuality / Gender reassignment / Marital status/ Civil partnerships / Maternity &amp; Pregnancy</b>		Zero*	Zero*

Commentary:

In line with other aspects of the two services, the proportion of staff is roughly 2:1 between SCC and BCC. The two staff groups are broadly very similar, with more female than male employees, though the SCC staff has a slightly older demographic (67% aged 40-60 compared to 57% in BCC).

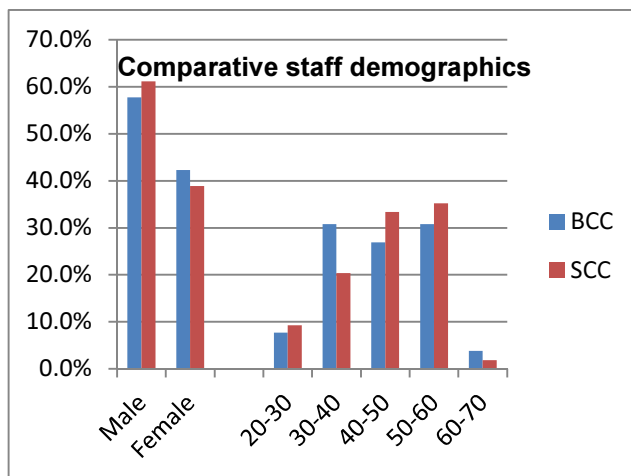
There is a higher proportion of full time staff (88%) within SCC than in BCC (69%).

Other data is not displayed (See note below the table). In some cases this is because it is not routinely collected but primarily, with such small populations, the convention is not to show very small numbers / proportions. For each of the categories the numbers in minority categories are very small and individual needs arising will be considered fully.

In summary, the data suggests that any changes that may impact on staff will need to be specifically responsive to the needs of three groups:

- Those currently in part time roles, where the terms and conditions may affect working patterns or base of operations
- The needs of the small minority of staff who have a disability
- The individual needs of the small minority of staff from BME ethnic groups

\*Data indicated as Zero is either not routinely collected or, in line with DPA principals would yield values of 10 or less and therefore carry an enhanced risk of identification by association



## 2. Wider county demographics

		BCC	SCC
<b>Gender</b>	<b>F</b>	50.1%	51.0%
	<b>M</b>	49.9%	49.0%
<b>Age</b>	<b>0-10</b>	13.7%	12.1%
	<b>11-19</b>	11.4%	11.9%
	<b>20-39</b>	23.2%	24.4%
	<b>40-59</b>	28.9%	28.2%
	<b>60-74</b>	15.0%	14.7%
	<b>75-84</b>	5.6%	5.9%
	<b>85+</b>	2.2%	2.6%
<b>Percentage change 2001 - 2011</b>	<b>0-10</b>	0.5%	6.78%
	<b>11-19</b>	5.9%	8.15%
	<b>20-39</b>	-7.8%	-4.22%
	<b>40-59</b>	7.7%	9.04%
	<b>60-74</b>	24.0%	20.01%
	<b>75-84</b>	22.5%	10.45%
	<b>85+</b>	26.3%	25.52%
	<b>Overall</b>	5.5%	6.94%
<b>Ethnicity</b>	<b>White</b>	86.4%	90.4%
	<b>Non-white</b>	13.6%	9.6%
<b>Other significant factors:</b>			
	<b>% Pensioners living alone</b>	11.8%	14.3%
	<b>% Population economically active</b>	73.6%	73.6%
	<b>economically inactive</b>	26.4%	26.4%
	<b>Long term sick / disabled</b>	2.0%	2.1%
	<b>Long term limiting illness</b>	13.4%	13.5%
	<b>Bad / very bad health</b>	3.5%	3.5%
	<b>Unemployed</b>	3.0%	2.8%

Commentary:

This data, drawn from the 2011 census, shows that there is a considerably similarity between the two counties.

The variations with the most potential significance identified here are:

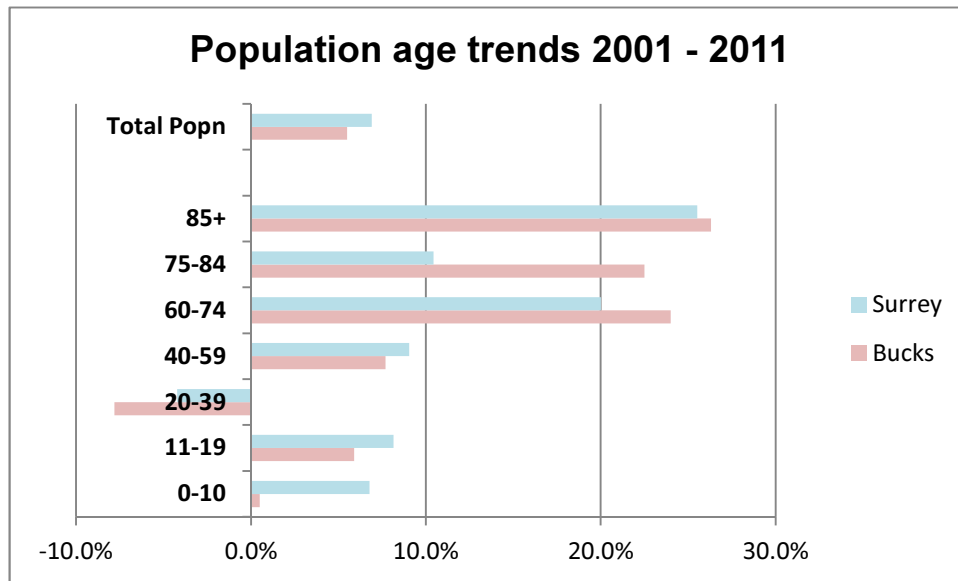
- The non-white proportion of the population in Bucks is 14% compared to 10% in Surrey
- The % of pensioners living alone is higher in Surrey (14%) compared to Bucks (12%)

Both of these groups are likely to be prominent in those identified as vulnerable to predatory or exploitative trading practices and each of the services has developed responses to the needs of these people and communities which should identify shared best practice within the joint arrangements.

The other significant factor is the indication of population growth between 2001 and 2011, which is significantly different for key age demographics between the two counties. (see below)

Since both existing services are intelligence-led and responsive to the needs of their local populations the data does not suggest that there will be any new issues anticipated from the establishment of a joint service.

## Population change 2001-2011



In terms of planning for the future shape of a service, the trend in population growth demonstrated between census figures provides a strong indication of future demand. The data for Bucks and Surrey, as illustrated in the above graph shows significant variations:

Both populations have grown, with Surrey's population growing at a faster rate (7% compared to 6% in Bucks). The growth in under-10 year olds is particularly different with a 7% increase in Surrey compared to less than 1% in Bucks. Combined with the figures for the teenage years, this indicates that there is a considerably faster growth in young families, in Surrey than in Bucks.

Both populations show a marked decline in the 20-40 age group (Down 4% in Surrey and 7% in Bucks), though these still represent around a quarter of the population overall.

Increases in the number of older people reflect the perception of an ageing demographic that characteristics most of the Shire Counties, but the rate of growth in Bucks, particularly for the 75-84 age group is markedly faster than in Surrey (+23% compared to +11%). In both counties the over 60s account for just under a quarter of the population but this will contrast more starkly in Bucks than in Surrey with the situation ten years before.

The aging population is linked to improved health care and personal lifestyles, but there is also an established and increase demand on social and health services as a result of those who are more socially isolated or in poorer health. The data shows that between 11 and 14% of over 65s are living alone and these people are recognised as being among the most vulnerable.

The population trends suggest that the growths in young families, and vulnerable older people, and the enhanced service demands that they represent, is likely to increase and needs to be factored into the new service design.

### 7a. Impact of the proposals on residents and service users with protected characteristics

Protected characteristic <sup>4</sup>	<u>Potential positive impacts</u>	<u>Potential negative impacts</u>	<u>Evidence</u>
Age			<p>The development of the joint service is expected to have no negative impact on consumers or businesses and, more specifically, will be <b>impact neutral</b> in relation to those people within the two counties who have one or more of the Protected Characteristics. The demography of the two counties (See Page 9, above) is very similar and both authorities have developed services that are responsive to the needs of their populations. These will continue to be delivered and, may be enhanced for vulnerable people, who are prioritised.</p> <p>The analysis of the population growth trends on page 10, above, indicates that there is significant growth in two key age groups – the under 10s (more noticeably in Surrey), and the over 60s, particularly the over 70s (increasing more rapidly in Bucks). Both of these age groups create specific demands upon Trading Standards services, particularly in terms of protection from faulty and dangerous goods, under-age sales and protection from rogue trading.</p> <p>The aim of the joint service development is to ensure that the local impact and effectiveness of Trading Standards is maintained and, where efficiencies and the widening of specialist service availability allows, services are expected to be enhanced.</p> <p>People recognised as being more vulnerable to predatory or exploitative business practices, which may include older people, those with disabilities, and people from other ethnic backgrounds, will continue to be regarded as a priority and the sharing of experience between the two services is expected to extend best practice and improve service across the new joint arrangement.</p> <p>Development working groups are actively working on strands of the Target Operating Model for the new service. Among these are the Working Practices and Business Planning groups that will be identifying the operational and policy frameworks for the new service. As this work progresses additional information will be assessed for Equalities consideration and any operational frameworks will be tested for potential impact on the protected characteristic groups. If deemed necessary a secondary EIA may be required</p>
Disability			
Gender reassignment			
Pregnancy and maternity			
Race			
Religion and belief			
Sex			
Sexual orientation			
Marriage and civil partnerships			

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## 7b. Impact of the proposals on staff with protected characteristics

The analysis of staff demographics is set out on page 8. On the basis of this evidence there is no expectation of any negative impacts on any of the existing staff arising from any Protected Characteristics. Any changes to Terms and Conditions, including Employer, working practices, roles and responsibilities, and job location will be subject to consultation, fully supported by HR and undertaken in compliance with approved policy and legislation. It is expected that a more detailed EIA will be undertaken once the staffing element of the joint service development commences the development and implementation phase.

Protected characteristic	<u>Potential positive impacts</u>	<u>Potential negative impacts</u>	<u>Evidence</u>
<b>Age</b>	The age breakdown of the staff is largely within the normal working age range and only a small proportion are aged 60 or older. The impact from the development of the joint service is expected to be neutral, but all processes will be managed with HR support and in line with established principles. A common approach to career progression (established in BCC but developing in SCC) may deliver positive impacts, especially for younger employees		See page 8, staff demographics, above. The proportion of staff aged 60 and above is 4% in BCC and 2% in SCC
<b>Disability</b>	Only a very small proportion of the staff are identified as having a disability. The impact from the development of the joint service is expected to be neutral, but all processes will be managed with HR support and in line with established principles. There is no expectation that most staff will be expected to relocate or co-locate, but there may be an issue with parking at the BCC offices that will need to be addressed		See page 8, staff demographics, above. The proportion of staff identified as having a disability is 4% in SCC. No data available for BCC
<b>Gender reassignment</b>		No evidence of any potential impact	No data available
<b>Pregnancy and maternity</b>	Around a third of employees are under 40 and may therefore have young families or may become pregnant. The impact from the development of the joint service is expected to be neutral, but all processes will be managed with HR support and in line with established principles.		See page 8, staff demographics, above. The staffs are both around 60% female and the proportion of employees aged 20-40 is between 30% (SCC) and 39% (BCC)
<b>Race</b>		Only a very small proportion of the staff are from a BME ethnic background. The impact from the development of the joint service is expected to be neutral, but all processes will be managed with HR support and in line with established principles.	See page 8, staff demographics, above. The proportion of staff from BME ethnic background is 4% in SCC. No data available for BCC

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<b>Protected characteristic</b>	<b><u>Potential positive impacts</u></b>	<b><u>Potential negative impacts</u></b>	<b><u>Evidence</u></b>
<b>Religion and belief</b>	No evidence of any potential impact		See page 8, staff demographics, above. There is no evidence of any religious or belief factors that need to be taken into account
<b>Sexual orientation</b>	No evidence of any potential impact		No data available
<b>Sex</b>	No evidence of any potential impact		See page 8, staff demographics, above. The majority of staff are female
<b>Marriage and civil partnerships</b>	No evidence of any potential impact		No data available



## 8. Amendments to the proposals

Change	Reason for change
None identified at this stage but equalities considerations will be factored into further development and planning and further EIAs undertaken where deemed appropriate	

## 9. Action plan

Potential impact (positive or negative)	Action needed to maximise positive impact or mitigate negative impact	By when	Owner
Potential for positive and negative impact on staff arising from changes to conditions of employment in establishing the joint service	<p>All activity conducted with HR support and in line with policy and legislative frameworks</p> <p>Full and open comms throughout with all staff</p> <p>More detailed EIA to be undertaken as the detailed arrangements are developed and implemented</p>	TBC but will reflect project and statutory timelines	Project Sponsors, supported by HR from BCC and SCC
No other specific actions identified at this stage but all developing elements of the Target Operating Model and implementation of the joint service will be assessed for equalities implications and other specific EIAs may be developed as identified			

## 10. Potential negative impacts that cannot be mitigated

Potential negative impact	Protected characteristic(s) that could be affected
None identified – the project is expected to be impact-neutral	

## 11. Summary of key impacts and actions

<b>Information and engagement underpinning equalities analysis</b>	Open and diverse staff communications throughout
<b>Key impacts (positive and/or negative) on people with protected characteristics</b>	None identified, though further developments and data will be assessed and additional EIAs undertaken if deemed appropriate
<b>Changes you have made to the proposal as a result of the EIA</b>	None identified at this stage
<b>Key mitigating actions planned to address any outstanding negative impacts</b>	EIA to support the detailed development of changes to staff conditions of employment
<b>Potential negative impacts that cannot be mitigated</b>	None identified at this stage

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