This Appendix sets out the project's response and consideration of staff written submissions. The table sets out the responses to written submissions received before 26 February 2013 and is followed by a summary of the event held on 26 February 2013 and subsequent written comments received.

EH Team	Aspect	Staff Comment	Response/Shared Service consideration
Food and Safety	Contractors	Mixed experience of quality provided by external contractors, would prefer to deliver in-house where possible	Contracts will be reviewed throughout the life of the service. Clearly, any contractor appointed would need to be of sufficient quality. Joint contracting could make quality contractors more affordable or provide 'economies of scale' opportunities to bring services back in house.
	Food hygiene courses	Decreased demand for courses. Staff see potential benefits in bringing this together	Benefits of this would be explored as per staff suggestion if shared service formed.
	Infectious disease enquiries	Set amount of work per authority, do not feel sharing will decrease the work load	Need to be aware of this for resourcing shared service.
	Animal Welfare	Only TWBC provide this through this team	TWBC would need to rule in or out and if ruled in function would be provided to and paid for by TWBC.
	Health & safety flexible warranting	There are advantages from having introduced flexible warranting but this has increased rather than decreased workload. The authorities plan to build on this through working together regardless of shared service proposals particularly through technical working groups. Riddor investigations represent an opportunity for improvements through sharing	A shared service would allow the advantages to be built on more formally and in a more structured way than proposals through technical working groups though the work of the groups would not be overlooked.
	Admin and technical support	EHO numbers have decreased over time, increasing reliance on admin and technical officers. Role has a technical nature and delivers a variety of functions not all can be considered 'admin'.	Any shared service structure would need to have due consideration of the importance of administration and technical support to the service. The possibility of strengthening this area to free up more EHO time will be considered as this will improve resilience.
	IT provision/partnership/systems	Strong concerns over changing ICT systems due to level of upheaval even if it improves the system. Can see advantages in learning from each other and sharing technology (i.e. magic pens).	Forming a shared service represents a good time to review systems and carry out changes as support and resourcing can be provided to so. The bringing together of ICT systems is fully supported by the ICT partnership. Difficulties in implementing a new ICT system do not rule out change on their own but need to be considered alongside costs and against the wider benefits of doing so.

Specialist or complex investigations	Authorities already support each other in these investigations and information and experiences are shared through technical working groups.	This would be expected to continue but also improved through more direct sharing arrangements within a shared service structure. Each of the authorities will have a lot to learn from each other and any shared service would be expected to take best practice forward. Staff would be fully involved in determining that best practice led by a shared service manager.
Technical working groups	Technical working groups perform a valuable support and knowledge sharing function to all authorities. Might be scope to develop them.	Technical working groups are managed by Kent EH Managers and the CIEH attendance at these groups would continue as appropriate. The advantage of a shared service over the Kent groups is the drive and formal structure to carry actions forward whereas the Kent Groups rely on consensus which can be slow to achieve. There are examples of items being agreed at TWGs that are then implemented separately but in different ways outside of meetings.
Training	Small amount of peer training that occurs and low cost training offered through technical working groups. This is an area that could be developed.	The role of the technical groups in delivering training is outside the control of individual local authorities or the Shared Service. Training, particularly cross and joint training, are a crucial part of delivering and running a shared service. This would be progressed as part of a shared service.
Front line field visits and web site development	Location a very sensitive and serious issue as frontline delivery is tied to it. There is an opportunity for authorities to work together to develop common issues across websites.	It is accepted that location is a crucial part of Environmental health delivery and that this is a key difference from other shared services that have been delivered through MKIP. There are other shared environmental health services from single locations that can be learned from but the design and modelling of MKIP's shared service needs to factor in its own considerations.
Legal advice	Legal partnership may assist in enforcement issues and this might be improved through the legal partnership.	Agreed. Sharing of legal advice and experiences through the EH shared service would also benefit in this area.
Local knowledge	Local knowledge important to effective service delivery. Need to understand the short to medium term impact if the local knowledge is lost.	It is accepted that local knowledge adds value to EH service delivery. Cross training, opportunities for officers to gain experience in other areas and clear succession and induction plans would be crucial. Capturing and retaining knowledge through the change will be important.

	Staff - the human impact	Very clear do not want this issue underestimated. Reduced morale, resources and productivity.	Understood. The service and structure will be designed to provide opportunities to staff where possible and whilst formal processes will be followed with staff, other change events and support for staff will be offered during the process. Where possible the aim is to implement the service with staff fully engaged.
	Alternative proposal	Suggest closer working, formal agreements, no changes to location or terms and conditions.	The business case will include a model that works from 3 sites for assessment.
Protection	Benefits of shared service	Some advantages to all parties. Understand need to work together to achieve the best possible model should it be agreed to progress into a shared service.	Staff input into the detail of the final design of the shared service will be crucial.
	IT systems crucial	Political, operational and technical issues to overcome. Need full corporate level integration. IT used by other teams including planning and building control. Integration cannot be rushed and if it is would lead to a reduction in quality and efficiency.	The ICT partnership allows full consideration of joined up corporate ICT systems and the proposed shared service will benefit from this. Any ICT system used for the shared service partnership will also be implemented in planning at the three authorities and where possible in building control and other areas. It is fully accepted that the ICT will underpin any successful shared service and it will not be rushed but implemented in accordance with an implementation plan that the delivery of the shared service is dependent on.
	Evolutionary not revolutionary integration	Following evolutionary approach could lead to easy cost savings wins by developing/expanding joint contracts, bringing services in house and these can be developed as contracts come up for renewal. Longer term integration allows savings to be made by areas as a) support systems (IT) are resolved b) contracts are renewed and assessment of roles carried out as personnel change or leave each authority. Evolution would also enable place shaping and cultural differences to be examined and overcome where possible. Quality and culture success maintained in short to medium and maybe improved in longer term.	Forming a shared service does not happen overnight and will need to take place in a structured and planned fashion to deliver a sustainable shared service. However, experience and learning in shared services generally and through MKIP's shared services shows that momentum and impetus in forming a shared service must be maintained and shared services designed and delivered within a clear timeframe in order to be successful. The aim would be to have a shared service in place by 1 April 2014. This allows 10 months to implement a shared service. Once up and running it will take time to maximise the benefits of a shared service and the shared service will evolve as additional benefits are realised and staff are able to make the most of there new environment and adjust to the change which it is appreciated could be significant.

Three fully functioning sites	Meaningful and supported presence required at each site. Can be satellite sites as long as fully functioning if smaller. Crucial to quality. Systems to ensure mutual support and crossover of best practices, skills and resources must be implemented. Each site would require own administration support.	As stated above a three site option will be included in the business case. If satellite offices are used they would need to be fit for purpose. This does not necessarily mean that administration support is required on site but would need to be available via ICT and integrated systems.
Need for shared overall manager	Not agreement on this issue across authorities. Manager needed to lead implementation. Some negative experience of a manager that has not had appropriate support structure or roles sufficiently specified to function within a team context. If a shared manager, must be supported from above and below and operate strategically.	Any shared service would have to have a shared service manager. Learning from other MKIP shared services has demonstrated this and given some of the complexities in this service arising from policy and other considerations a shared service manager will be crucial. The need to support that manager appropriately and clearly define all levels within the service is completely accepted.
Senior post/team leader	Each site will need a senior post/team leader to provide supervisory support and operational involvement. Alternatively, if the shared model results on one or two sites only then an alternative option would be to have team leaders for work functions with considerable cross over in supervisory/ practical case load.	Team leaders will be expected at each full site during normal operation. Flexibility will need to be built in for responding to major issues whereby team leaders' expertise maybe required on a particular site (satellite or otherwise) or out of the office.
Ease of sharing services is function dependant	Short and medium term some functions will share well and others will not. Some functions may be more easily partially shared. E.g. development control consultations. In this case, initial responses will need to stay at a local level to ensure the council "place shaping", local "culture", individuality and requirements are maintained. However, analysis of technical reports should be possible by suitably qualified and competent officers in any of the teams. How this would be achieved logistically is another issue and will ideally require IT standardisation.	Part of delivering the service will be identifying those areas that readily lend themselves to sharing and those that do not. Where functions can be shared a plan will be put in place to implement sharing and gain the benefits from doing so. If a function cannot be shared it will be provided to the relevant authority in accordance with agreed service levels.

Evolutionary approach best for cultural success factor	An evolutionary approach with each team learning best practices from each other and a shared culture will develop positively through time. This will be crucial to overall success. A revolutionary approach will force people together with resultant personnel and operational problems that will entail.	Some elements of the shared service will take longer than others to deliver. Even from April 2014 (the proposed 'go live' date of a shared service) further learning and development of a shared culture will be expected. It is accepted that there will issues that arise as a result of forming a shared service and implementing major change. These will need to be appropriately managed and this is often better done over a shorter timescale than allowing the issues to drag out over a longer timeframe.
Commonality from pollution officer group	Each individual team has raised similar thoughts comments and conclusions about the feasibility of shared services and challenges to be overcome. Details can be seen in the attached table.	The comments and input from staff will be factored into shared service development and the work done by staff in identifying these is appreciated.
Shared manager post	What will be the role of the manager post and how will it be supported? Will the post be permanent or a transitional post?	The post would be permanent. Full details of an environmental health structure will come forward as part of formal staff consultations if a shared service is agreed.
IT integration	It is strongly recommended that IT integration and timescales for that integration of essential systems is resolved before an EH shared service integration to avoid causing significant loss in quality in the short-term.	An ICT project is underway to deliver shared planning and environmental health systems across the three authorities. This system will need to be fully operational and in place before a shared service could 'go live'.
Impact on existing customers (networks)	A shared service may impact upon the service that EH provides to many local stakeholders e.g. Planning, E.A Housing Associations, Licensing, and Police. Have the views of partner services and agencies been sought as to how they would like services to deliver in any partnership or are there plans to? We feel that they should be.	It is agreed that the impact on customers will need to assessed to establish how best to provide a service to them from a shared service and this will be done as part of developing the detail of the shared service once the model and principle of forming a shared service have been formally agreed.
Services scoped in	The functional scoping document identified some services that are currently delivered outside of the scope of the shared service scope document. For example TW Air Quality, MBC and Swale Environmental Enforcement/Response teams. Are these included? Both rely on support from teams that are included and the decision about their inclusion has practical implications.	Each authority will have decisions to take with regard to some functions. If they want them provided from the shared service they will need to be resourced and paid for by that authority. If they are not brought in then their relationship with the shared service will need to be understood.

	Legal opinion on strategies	A legal opinion should be obtained regarding shared strategies or action plans that are required by law e.g. Contaminated Land and Air Quality Action Plans.	This can be done if this is felt the best way to progress. If not individual strategies will be retained. The political aspect of members wanting different policies at each authority also needs to be considered.
	Flexible home working	Need to retain good home work capability whilst maintaining full office cover. Changes should not impact on the capability of teams to do this. Flexible/home working should not be seen as the answer to making poor quality satellite offices as this will diminish the quality, efficiency and culture of the service.	Flexible and mobile working will be crucial to a successful shared service and will form an important part of a shared service's model of operation. Cover within the office(s) will be important and levels must not impact on service delivery. The ability to cover offices and workloads will be a consideration under 'resilience' in assessments of the models.
	Role definition is very important	Team leaders and how they integrate with the manager is key. Will they operate at strategic or operational level, or a bit of both? Different functions require different strategic input. For example air quality and sustainability requires considerable strategic and corporate involvement and is not a secondary, small function in terms of impact on the public.	Agreed.

Staff Meeting – Environmental Health Team leaders – Oakwood House – 26 February 2013

A meeting with Environmental Health staff representatives was held on 26 February 2013 where the project board presented the draft business case for an Environmental Health shared service to staff. The report had been circulated to all Environmental Health staff late on Friday 22 February.

Having run through the report with staff the Board asked them to consider the report amongst themselves (the Board left the room) and produce a list of their main concerns and questions they wished to raise. All staff were also given until Monday 4 March to return more detailed comments to the Board.

The immediate concerns and questions raised at the meeting were as follows:

1. How did you get the scores – further clarification required
2. IT Critical - Stress how the IT is a critical factor and how due to previous experience not sure if this will be delivered on time.
3. Staff Conditions – who will we be employed by. Recruitment of new posts, post matching/advertising.
4. Finance – again more clarification required.
5. Satellite Officers/Touch Down how will they be staffed.

There was a discussion on each of these points in the meeting and remaining concerns and questions were asked to put into the submissions to the Board by 4 March 2013.

Three submissions, one from each authority, have been received as well as emails requesting clarification or commenting on the business case. These have been summarised and responded to below. These documents are available in full for inspection by the MKIP Board if they wish in order for them to be able to view staff comments in full.

Summary of Main Issues Raised and Common Concerns from Staff

Critical Success Factor Assessment and Preferred Models

Maidstone agree with one site as the preferred model (subject to the option 8 consideration below). Swale and Tunbridge Wells express support for 2 site model over 1 site (see option 8 consideration below).

Swale and Tunbridge Wells have submitted alternative scoring for the models as follows:

	1 site Project/Swale/TW	2 sites Project/Swale/TW	3 sites Project/Swale/TW
Resilience	36 / 36 / 34	35 / 36 / 38	26 / 35 / 28
Quality	30 / 25 / 25	28 / 28 / 30	25 / 30 / 25
Culture	20/ 20 / 20	13 / 13 / 18	5 / 12 / 5

Efficiencies	8 / 8 / 8	10 / 10 / 10	5 / 5 / 10
Total (out of 100)	**94 / 89 / 87**	**86 / 87 / 96**	**61 / 82 / 68**

Staff Ranking of Model Preference/ Definition of Satellite Office/ Option 8

The view from staff is that the exercise for ranking preferred models undertaken by staff has been misprepresented in the business case as the work was done on the assumption that satellite offices would provide more than touch down/hotdesking/meeting points. In one case the views from staff were made on the basis that the satellite offices would be fully staffed and supported.

The concern from staff is therefore that by representing their rankings as we have we could mislead the Board. The point made above should therefore be considered by the Board when giving weight to the staff rankings.

In addition staff feel that option 8 (3 sites working more collaboratively over time) as proposed by Maidstone has been underplayed and not given sufficient weighting. The alternative scores from Swale and Tunbridge Wells provided above have amended the 3 site scoring to reflect how they see option 8 working.

The Project Board does not feel that it misunderstood option 8 and are confident that it was given the correct consideration. The concerns with option 8 arise primarily from not having a clearly defined shared service to aim for and the need to drive towards that goal in a realistic timeframe to the satisfaction of the MKIP Board. However, option 8 does show some very positive approaches that can be taken to deliver a shared service and is not being discarded as an option but will be integrated into the delivery plan for a shared service to build on the constructive approach taken by staff.

Included Functions/Concerns on Reactive Work/ Flexibility to Deliver Functions

Staff would like clarity on included functions and an additional appendix (Appendix G) setting this out has been included as a result. However, the inclusion and provision of reactive work is of concern to Swale and particularly Tunbridge Wells where it is felt there could be a significant impact on provision of reactive work from a single site.

The concerns raised by staff are understood and the provision of reactive work will be a primary consideration for the Environmental Health Manager. A clear strategic steer has been given from Tunbridge Wells' management that the reactive work is to remain in rather than extract it from the shared service. It is considered by the project board to be deliverable from a one site model and the use of a rota system, for example, could be used to deliver it with either rota'd officers working from Swale or Tunbridge Wells offices or supported to work from home depending on practicalities.

Some concerns are raised as to how staff will cover duties that other authorities do not provide. For example, would Maidstone officers be trained to cover Tunbridge Wells' reactive work? This will be for the Environmental Health manager to determine and deliver keeping in mind that each authority will expect the service it has paid for. Resilience would be improved by having cross training and sharing of skills.

Quality of Service to Internal and External Customers

There is a suggestion in staff responses that impact on quality has not been sufficiently factored into the models by the project board in carrying out there assessments. Particularly the impact on internal customers such as councillors. The Board have considered these impacts in reaching their assessments and the provision of meeting space at other sites, alternative communication methods and improved systems are all expected to deliver a quality customer service to internal and external customers.

Importance of ICT

The importance of ICT to running the service is reiterated by the staff comments. This is fully understood and accepted. The provision of a new ICT system, flexible working technologies and support and linkages to other ICT systems are all crucial. The provision of a new ICT system is the critical task in the timeline for delivering the project and as such if the provision is delayed so too would the delivery of a shared service from a single site. The project board fully accept this.

Concerns Over New Structure/ Presentation of Structure Chart/Split into North and South Teams

A variety of concerns are raised by staff regarding the specifics of the new structure, how the structure chart is presented (particularly banding together and use of terms such as Principal Environmental Health Officer (PEHO) and Environmental Health Officer (EHO)). The basic structure chart as presented to staff uses such terms due to the banding used to calculate the finances and staffing levels for a shared service. In reality it will be for the Environmental Health Manager to produce a more detailed structure with actual job titles and present that to staff as part of the formal HR consultation process to include the Unions. For example one solution would be to have career graded EHO posts that provide a flat structure and the opportunity for progression to staff.

As the staff responses demonstrate it is clear that the basic structure chart used to present to staff should include financial information to demonstrate the purpose of the bandings. Therefore Appendix F has been amended to include a confidential page that shows the costs of each level of structure. The reason for making this element confidential at this stage is that individual staff salaries can be identified from the information.

The split into North and South teams proposed also retains some flexibility as to how they will be divided and the principle of North and South teams can be commented on as part of staff consultation. This division would be internal to the shared service and therefore be under review by the Environmental Health Manager and open to amendment in order to be responsive to the needs of the staff and authorities.

Storage and Equipment

Concerns are raised over the laboratory and storage space and technical environmental health equipment. These concerns will need to be addressed through auditing, rationalising and ensuring that the equipment needs of the service are met. Additionally, a budget has been included as part of forming the shared service that could be used to procure more equipment if a need is identified as part of this work.

General Comments on the Report and Process

A number of comments have been received that regard the consultation timescales as too short, that scores are influenced by a desire to move to one site and that the report is presumptive in favour of an outcome before the consultation process with staff has finished.

It is important to note that this is not a formal consultation process with staff and is part of the project board involving and giving due consideration of staff comments on the business case. A formal staff consultation would be carried out if the MKIP Board and then each authority's Cabinet agree to form a shared service.

In addition the report has remained open to amendment due to staff comment and the need to capture staff feedback. This is the purpose of this appendix which the project board hope has captured the main staff concerns. However, before reaching a view on the business case the decision makers are recommended to consider staff comments received in full.