

Decision Maker: Executive on 28th November 2012;

**General Purposes and Licensing Committee
on 21 November 2012**

For Pre-Decision Scrutiny by

Date: Environment PDS Committee on 20th November 2012
Executive and Resources PDS Committee on 21st November 2012

Decision Type: Non-Urgent Executive Key

Title: **PARKING SHARED SERVICE**

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Chief Officer: Nigel Davies, Director of Environmental Services

Ward: All

1. Reason for report

This report seeks Member approval for proceeding with a shared parking service with the London Borough of Bexley. It summarises the outcome of discussions with LB Bexley on creating a shared service, and provides an assessment of the likely levels of savings that could be achieved through adopting this approach.

2. **RECOMMENDATION(S)**

That the Executive:

- 2.1 Notes the responses received from staff and their representatives with regard to entering into a shared parking service arrangement with LB Bexley;
- 2.2 Approves the proposal for a shared parking service between the London Boroughs of Bromley and Bexley to be established on the basis set out in this report;
- 2.3 Delegates to the Chief Executive the power to approve the formal Shared Services Collaborative Agreement between LB Bromley and LB Bexley for the provision of parking services; and

2.4 Indicates which option for an assessment of externalisation opportunities should be progressed:

- Brought forward once the shared service has been successfully established; or
- Assessed prior to creation of the shared service

That the General Purposes and Licensing Committee:

2.5 Agrees (subject to the comments of the Executive & Resources PDS Committee and the Environment PDS Committee, and agreement from the Executive) in accordance with Section 113 of the Local Government Act 1972 and the Council's scheme of delegation, to place such of the Council's employees as may fall within the remit of the scoping of the shared parking service, at the disposal of the London Borough of Bexley. Any such officer shall be treated for the purpose of any enactment relating to the discharge of local authorities' functions as an officer of that other local authority.

Corporate Policy

1. Policy Status: New policy.
 2. BBB Priority: Quality Environment. Vibrant Thriving Town Centres.
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Financial

1. Cost of proposal: Estimated cost One off costs of £56k
 2. Ongoing costs: Recurring cost. Estimated savings of at least £94 k p.a. from 2013/14.
 3. Budget head/performance centre: Parking Services
 4. Total current budget for this head: £6.7m (credit)
 5. Source of funding: Existing controllable revenue budget 2012/13
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Staff

1. Number of staff (current and additional): 25.6fte current posts in LB Bromley parking Services
 2. If from existing staff resources, number of staff hours:
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Legal

1. Legal Requirement: No statutory requirement or Government guidance.
 2. Call-in: Call-in is applicable
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Customer Impact

1. Estimated number of users/beneficiaries (current and projected): All users of parking services within the boroughs of Bromley and Bexley
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Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A.
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

- 3.1 This document sets out the case for the London Borough of Bromley to share parking services with the London Borough of Bexley.
- 3.2 The principle of sharing services is that, by combining services across the boroughs, there is the potential for management costs and other overheads to be reduced without affecting the delivery of the front-line service. Local authorities can no longer assume that undertaking any activity on a stand-alone basis is the most cost-effective means of delivery in the light of significant budget pressures.
- 3.3 The rationale for a shared parking service is to streamline management, back office and ICT functions to enable cashable savings and develop best practice across both authorities. It is anticipated that savings can be realised from April 2013, with further potential savings when existing contractual obligations for parking enforcement expire and can be aligned into a single shared contract. The two boroughs are similar geographically, and in their approach to parking strategy. Further Bromley and Bexley have a successful track record, having successfully combined their Libraries service in the past financial year.
- 3.4 During 2012 there have been a series of discussions with LB Bexley, exploring the strength of the business case for a shared service and the potential for financial savings. Research has been undertaken to determine the staffing level needed to support the authorities' business requirements, and a proposed shared service staffing structure has been drafted (see Appendix 1). Regular steering group meetings have been held, comprising Assistant Directors and Heads of Service, along with other relevant senior management representing Human Resources, Legal Services and Finance. This project has been tracked across both boroughs by the joint Chief Executives' shared services board.
- 3.5 There are synergies in both boroughs' service delivery and policy approach. Elements of the current management structures for the delivery of parking services in Bromley and Bexley are effectively duplicated. Much of the parking procedures are defined by law within the Traffic Management Act; where there are differences, research indicates they could be managed effectively within a shared structure.
- 3.6 From the discussions and research undertaken, there is a valid business case which would generate ongoing financial savings through a shared parking service under one management structure.
- 3.7 An alternative approach to the creation of a shared service would be to continue to seek further efficiency savings from the stand-alone LB Bromley parking service. At current enforcement activity levels, this option would however be unlikely to generate staffing savings of more than 1 fte and there would be no additional saving from a shared ICT contract. Joint procurement of parking enforcement by the two boroughs could still provide some savings, but it is unlikely that these would be on the scale achievable from a single shared contract.
- 3.8 The option to seek savings through outsourcing the Parking Appeals and Debt Recovery element of the service was previously considered by the Environment PDS Committee on 1st June 2009 ('Report of the Member Parking Working Group' ES09053). The Committee took the view that "*Functions relating to motorists' representations, and debt collection, should continue to be provided as part of the core in-house Parking service*" and that "*the business case for (externalisation) should be examined when the options for the parking enforcement contract are next considered*". Members now have the opportunity to reconsider this view.

3.9 An analysis for both boroughs could be undertaken to explore any potential to generate additional savings through externalisation; in particular activities relating to the management of motorists' appeals, representations and the collection of PCN fines. Members are asked to take a view on the options for bringing forward this assessment:

- Once the shared service has been successfully established; or
- Assessed prior to the proposed establishment of the shared service in April 2013

It should be noted that pursuing the second option would impact on the work being undertaken to draw up and negotiate the formal shared service Collaboration Agreement, as well as the detailed practical work being undertaken to ensure the shared service is established successfully. A view from LB Bexley officers is being sought on these options, and will be reported verbally.

3.10 The anticipated benefits of the business case include:

- Operational cost reductions for both boroughs:
 - It is expected that there will be staff savings of between £190k and £240k p.a. in total, with £70k to £100k p.a. apportioned to Bromley and £120k to £140k p.a. to Bexley.
 - The amalgamation of the ICT contracts in a shared service would save £30.2k p.a. in total, with £17.8k p.a. to Bromley and £12.4k p.a. to Bexley; this is additional to the saving which would be achieved from the successful joint tender process with LB Bexley, were the services to remain separate.
 - Further savings from economies of scale and service improvement would be sought from the shared service after it has been established.
 - Additionally, the enforcement contracts (current annual combined cost of £3.7m p.a.) could be amalgamated in 2016, offering further scope for significant savings.
- Greater service resilience – the service will be less vulnerable to staffing changes, and will have a reduced exposure to variations in parking activity.
- Pooling of staff capability and resources, increasing the potential opportunities for service improvement benefitting motorists and residents within Bromley and Bexley.

3.11 The key principles behind this agreement are that:

- This will be a partnership between both boroughs, with benefits and costs shared, as agreed by both parties;
- Appropriate governance arrangements, formalised in a Collaboration Agreement, will ensure democratic accountability;
- There will be a single, joint management structure, which will provide leadership and accountability to both boroughs;
- LB Bromley will act as host borough for the shared service;
- Specialist and support staff will be shared (it is proposed that all staff will be based at Bromley's Civic Centre, with those staff employed by LB Bexley seconded to LB Bromley)
- Service contracts will be harmonised and jointly procured (ICT in April 2013 and Enforcement by April 2016);
- Best practice within each parking service will be deployed to the benefit of both authorities.

- 3.12 Subject to approval of these proposals, the first immediate task will be to appoint staff to the new structure set out in Appendix 1. In addition, work has already commenced on the drafting of a detailed Collaborative Agreement between the boroughs, based on the agreement made in respect of the shared libraries service. With a staffing structure in place and a formal Collaborative Agreement, the shared service would then become operational from 1st April 2013.
- 3.13 It should be noted that the implementation of the proposals detailed in this report is subject to the London Borough of Bexley also taking the decision to establish the shared Parking service.

PROPOSED PARKING SHARED SERVICE GOVERNANCE MODEL

- 3.14 It is proposed that the development of a joint parking service will involve the creation of an integrated management team, reporting to the respective Deputy Director/Assistant Director in the two boroughs (the responsibility for direct line management of staff would be held by the relevant LB Bromley Assistant Director). At point of delivery, the shared service will maintain the necessary local distinctions of the two boroughs. The reporting lines to the respective Deputy Director/Assistant Director will be essential to ensure the link between the new structure and local accountability is maintained. The delegated authority for Bromley to act on Bexley's behalf will be outlined in the final Collaboration Agreement for the shared service. It is proposed that there will be four sections within the new shared parking service as follows (attached at Appendix 1 is the proposed staffing structure):

- Contract and Operations Management Team (including CCTV operations*)
- Strategy and Service Development Team
- Appeals and Debt Recovery Team
- Car Parks and Asset Management Team

*LB Bexley does not currently operate fixed CCTV cameras for parking enforcement; the LB Bromley parking CCTV staff would be line managed from within the shared service.

- 3.15 A joint Parking Management Board will have delegated responsibility for overseeing the management of the service at officer level. The Board will comprise the Assistant Director (LB Bromley), Deputy Director (LB Bexley), the Head of Parking shared service, and also Finance and HR representatives from both boroughs. Other colleagues from both boroughs would be invited to join the team on an invitation basis to give advice on key issues as they arise.
- 3.16 The joint Parking Management Board will have delegated responsibility for the management of the joint working arrangements. Key responsibilities will include:
- Preparing the joint Business Plan;
 - Preparing and agreeing a detailed work programme in accordance with the approved joint Business Plan;
 - Preparing the budgets and estimates for approval by both Councils;
 - Overseeing the implementation of the agreed work programme;
 - Overall responsibility for delivery against the approved Business Plan;
 - Identifying the need for specific projects or tasks to be undertaken;
 - Procurement of a shared enforcement contract; and
 - Identifying business development opportunities.

- 3.17 At Member level, the service would continue to report to the Environment Portfolio Holder (Bromley) and the Cabinet Member for Environment and Public Realm (Bexley). Within LB Bromley, the Environment PDS Committee would continue to fulfil the policy development and scrutiny role. A review after the first six months of operations will be reported to Members in both boroughs.
- 3.18 It is proposed that Bromley hosts the shared service. The reasons for this are:
- Bromley's parking service controls an extensive fixed CCTV structure - Bexley currently do not operate any fixed CCTV enforcement and moving this operation would incur a substantial cost to initiate and maintain;
 - Bromley's parking service is larger in scale – Bromley issued 64.5% of the total number of PCNs issued by both boroughs in 2011/12.
- 3.19 The service will be based at Bromley's Civic Centre, making use of current space. Bromley currently encourages staff to work from home, where appropriate, and there will be a continued emphasis on flexible working including home working. An option under consideration is to have 'touch down' spaces within Bexley's new town hall as an off-site work space for Parking staff from the shared service.

ICT SYSTEMS

- 3.20 One of the issues addressed in developing the Parking shared service proposal has been the specialist ICT system that would manage the day to day workload of the service. LB Bromley was due to go out to tender for Parking's ICT in December 2011, having received Committee approval in July 2011 to use the Eastern Shires Purchasing Organisation (ESPO) framework. The tender process was therefore aligned with the development of the shared service proposal with the London Borough of Bexley.
- 3.21 In September 2012 a joint tender proposal was sent out under the ESPO framework for the provision of a back office ICT solution for Bexley and Bromley Parking services. The options under this tender were to provide an option for a solution for a potential shared service alongside options for providing separate solutions for each borough (with potential discount for procuring jointly). Preceding this tender a Market day was provided for all suppliers under the framework to outline the early proposals of the shared service and the strong political and economic backing that shared services has.
- 3.22 The results of the tender have been evaluated jointly by Bexley and Bromley and a clear result has been established. The Environment Portfolio Holder will be asked to approve the award of the Parking ICT Contract subsequent to the meeting of the Environment PDS Committee on 20 November.
- 3.23 In respect of administrative ICT systems, Bromley's Central ICT team has been involved in the project, and the network and lines are in place for staff based at Bromley and working from home to connect to Bexley's applications, including Oracle and ordering systems. There are one-off costs of up to £20k to connect to the systems, which will be met jointly. Costs are lower than anticipated as existing ICT connections can be utilised following the successful creation of the shared libraries service.

FINANCIAL MODEL

3.24 The ongoing costs of the joint arrangements will include staffing, accommodation costs, ICT costs and support service costs. There will also be non-recurring costs that will include redundancy and ICT set up costs. Senior finance and service staff from both authorities have met to discuss the financial model that will form the basis for the allocation of costs. The costs will be shared on the following basis:

- Staffing costs will be shared equally, except for Parking Appeals staff, where the proposed split is based on the relative numbers of penalty charge notices (PCN) issued. For the Appeals function this results in a 64.5:35.5 cost split between Bromley and Bexley in year 1, but this will be reviewed on an annual basis
- ICT contract costs will be apportioned on the basis of the ratio of costs to the two boroughs, were they to retain separate contracts. This results in a 61:39 split between Bromley and Bexley
- General running expenses and support service costs will be shared equally, apart from those that are linked to PCN numbers or are staff based. In these cases, the 64.5:35.5 percentage cost split noted in the first bullet point above will be used.
- Non-recurring costs will be shared on a 50:50 basis. However, as the Bexley severance payments are higher for Bexley staff, it is proposed that these additional costs be solely met by Bexley.
- Accommodation costs will ultimately be shared on a 50:50 basis, although the share paid by Bexley initially will be 25% of this sum in year 1, rising by 25% a year until the full 50% share is achieved in year 4 of the shared service.

IMPLEMENTATION TIMETABLE

3.25 The table below outlines the proposed implementation timetable for the shared services project.

Trade Union and staff consultation commenced	22 October 2012
End of consultation	21 November 2012
Decision made to share services subject to a full sign-off by both boroughs	28 November 2012 (LB Bromley); LB Bexley will decide in parallel with this date
Appoint to Head of Service post	December 2012
Appoint to all other posts	December 2012 - January 2013
Complete formal Shared Service Collaborative Agreement	February 2013
New structure established	March 2013
Staff relocate to new locations	April 2013
Formal commencement of shared service	April 2013

Throughout this process, officers will be seeking to ensure that a consistent message is communicated across both boroughs in relation to the progress of the shared parking service project. In order to ensure this happens, both boroughs have coordinated dates for the release of key information and press releases.

4. POLICY IMPLICATIONS

- 4.1 The Parking service makes a significant contribution to the Council's objectives of a Quality Environment and Vibrant, Thriving Town Centres. The Council's overall approach to parking and enforcement is outlined in Bromley's Parking Strategy, which was approved by the Environment Portfolio Holder subsequent to the meeting of the Environment PDS Committee on 18th January 2012. The Parking Strategy itself is consistent with the recommendations of the Parking Working Group, endorsed by the Environment PDS Committee on 1 June 2009.
- 4.2 The Council is seeking to make cost reductions while maintaining service levels. Sharing services with other councils is one approach which can contribute to this objective.
- 4.3 The staffing structure, as set out in Appendix 1, will ensure that Parking Services policy issues are managed: that is, Bexley and Bromley will continue to have discrete policies with regards parking where necessary and in order to address Member priorities, although working practices will be aligned where appropriate in order to improve service effectiveness. Staff members will be kept aware of different policy approaches that may affect operations. Any changes to policy and practice will need to be agreed by respective Members.

5. FINANCIAL IMPLICATIONS

- 5.1 This report proposes to set up a parking shared service between Bexley and Bromley authorities.
- 5.2 A draft structure has been drawn up and is set out in Appendix 1. The full year savings from staffing are expected to be between £190k and £240k with Bromley's share being £70k to £100k, subject to the final structure, grades and any staffing implications that arise. It is proposed to use the same model as the library shared service in that staff would be seconded into the structure and would continue to be paid by their existing employer.
- 5.3 A financial model has been agreed to allocate the costs of the shared service. The ongoing costs of the joint arrangements will be split according to the model detailed in 3.22 above. One-off ICT costs will be shared 50:50.
- 5.4 The potential one-off redundancy costs are estimated to be £100k, excluding any costs for the enhanced severance costs which Bexley will meet. The proposal is that the £50k cost to LB Bromley will be funded from the central contingency provision set aside for redundancy/early retirement costs arising from budget savings. This was approved by full Council in February 2011. These costs may be reduced should any affected staff be redeployed.
- 5.5 In order to enable all staff to access systems from both Bromley and Bexley, additional work will be required to ensure that the network, lines and necessary connections are in place on 1st April 2013. These additional one-off costs are estimated to be £20k and will be shared equally between the two boroughs.
- 5.6 Subsequent to the Environment PDS Committee on 20 November 2012, the Environment Portfolio Holder will be recommended to approve the award of a contract for the Parking ICT system. Should both LB Bromley and LB Bexley agree to establish a shared service, then additional savings of £17.8k p.a. would accrue. These are included in table 5.7 below.

5.7 The table below summarises the potential savings and the known costs to date: -

	2012/13 £'000	2013/14 £'000	2014/15 £'000	2015/16 £'000	2015/16 £'000
Savings					
Staff savings	0	(70)	(70)	(70)	(70)
Shared IT system	(4)	(18)	(18)	(18)	(18)
Contribution towards post room	0	(14)	(14)	(14)	(14)
Contribution towards accommodation costs	0	(6)	(12)	(18)	(24)
Total savings	(4)	(108)	(114)	(120)	(126)
Expenditure					
IT investment (£20k)	10	0	0	0	0
Redundancy costs (£100k)	50	0	0	0	0
Additional staffing resources in post room	0	14	14	14	14
Total expenditure	60	14	14	14	14
Total net savings	56	(94)	(100)	(106)	(112)

5.8 The post room work for LB Bexley would be undertaken by LB Bromley. This will require an additional 0.5 fte, which will be directly funded by LB Bexley and is included in the table above.

5.9 It should be noted that further work is necessary to account for and finalise all costs and savings, to enable a budget to be prepared for the new service and included in the Collaboration Agreement. Further savings could accrue when the parking enforcement contracts are renewed for both boroughs in 2016. Nonetheless it is clear that the savings available through creating a shared service would be significantly greater than those which could be generated through an internal efficiency review.

5.10 As explained in para. 3.9 above, an analysis for both boroughs could be undertaken to explore any potential to generate additional savings through externalisation. Members are asked to take a view on which option for timing of this assessment should be progressed. It should however be noted that the shared service proposal includes significant efficiency savings from the Parking Appeals and Debt Recovery function, through elimination of duplication and economies of scale from an enhanced capacity to manage peak service demands.

5.11 Members should be made aware of the risks for Bromley around the non-achievement of the income levels for Bexley. A number of industry standard performance indicators will be incorporated in the collaboration agreement; however there is still a risk that the shared service may not achieve the required levels and Bromley could be required to compensate Bexley for any potential loss of income. The formal Collaboration Agreement will need to address this risk to meet the requirements of both boroughs.

6. LEGAL IMPLICATIONS

6.1 There are a number of powers that allow local authorities to provide services to each other – for example the Local Authorities (Goods and Services) Act 1970; and to place staff at the disposal of another local authority – Section 113 Local Government Act 1972.

6.2 The recent case of RMP v London Borough of Brent has effectively taken most local authority shared service initiatives (which include only public bodies) outside of the EU procurement regime.

- 6.3 The Local Government and Public Involvement in Health Act 2007 and the new Statutory Guidance for the 'Duty to Involve' place authorities under a duty to consider the possibilities for the provision of information to consultation.
- 6.4 In accordance with the Equality Act 2012 there is a duty on public bodies to publish information showing how they are complying with the public sector equality duty when taking decisions and making policies, including information about the impact of their policies and decisions on both employees and the public.
- 6.5 The intention to reduce staff has employment implications and may result in claims for breach of contract and/or unfair dismissal under the Employment Rights Act 1996 and/or under the Equality Act 2010. The new Equality Act 2010 protects employees from direct/indirect discrimination, harassment or victimisation on grounds of sex, race, disability and age.
- 6.6 A shared service can be structured in a variety of ways; the type of structure determines the legal requirements that need to be satisfied. As the proposals concern a merger of Bexley's and Bromley's service provision, as opposed to one authority purchasing these services from the other or both councils purchasing the service from a newly created joint venture company, procurement considerations are not relevant. There are powers in the Local Government Act 1972 and the Local Government Act 2000 which enable authorities to exercise functions jointly. The Local Government Goods and Services Act 1970 allows authorities to provide services to each other.
- 6.7 As outlined below in Section 7, the staffing structure will be a substantive consideration. It is proposed that staff be seconded from Bexley to Bromley, and therefore issues under the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) will not apply to the shared service. Section 113 of the Local Government Act 1972 allows for such a secondment.
- 6.8 The shared service will be documented by a formal Collaboration Agreement between the Bexley and Bromley. The terms of this Agreement will be negotiated by the officers of both authorities but the key provisions will be:
- Term of the agreement/extensions/ break clauses
 - Obligations of respective parties
 - Governance arrangements.
 - Identification of staff who fall within ambit of the arrangements/management structure/seconded staff
 - The process for appointing staff/the consultation that has taken place to date and any representations made in this regard (also the consequences for unsuccessful staff)
 - The process for replacing leavers once the arrangements are in place
 - Details of the financial arrangements to be addressed
 - Process for reviewing the progress of the Project
 - Process for varying the agreement
 - Dispute resolution provisions
 - Termination

7. PERSONNEL IMPLICATIONS

- 7.1 The proposals for the shared service have redundancy implications, and formal consultation on the staffing impact, in line with the Council's procedures for managing change, has taken place with staff, Trade Unions, the Staff Side Secretary, and Departmental Representatives. The outcomes of this consultation will be reported verbally to Members.

- 7.2 There are a number of staffing issues that need to be addressed when undertaking shared service arrangements. Whilst consideration has been given to the option of transferring staff, the approach of both LB Bromley and LB Bexley is instead to second relevant staff. This approach has been successful in the establishment of the shared libraries service. It retains maximum flexibility, for example should the shared service arrangement be extended to another authority in future. All posts in the proposed new structure have been jointly evaluated and salary levels between the boroughs for each role are broadly comparable. Any Bexley staff that are offered and accept new roles in the structure will be seconded to the shared service and will be appointed on Bexley's terms and conditions. All staff will continue to be paid through their current payroll service.
- 7.3 The current structures in Bromley and Bexley consist of a total of 37.9 fte employees. The current number of employed staff directly affected by these proposals is 15 fte in Bexley and 17 fte in Bromley (32 fte in total). The new joint structure would reduce this total by 10.2 fte posts as the proposed new structure contains 27.5 fte posts. It is proposed that all roles in the new structure will be ring-fenced to staff directly affected by the proposals. Both councils have a policy of avoiding compulsory redundancies wherever possible and all efforts will be made to find redeployment across respective councils for post holders at risk who do not secure a post in the new shared parking service. In the event that suitable alternative employment cannot be found, they will be made redundant.
- 7.4 In accordance with our statutory and procedural obligations, meetings are being held with staff both directly and indirectly affected by the proposals, and are also being held with Trade Unions, Departmental Representatives and the Staff Side Secretary. Whilst both boroughs are undertaking this consultation separately, it is being undertaken concurrently with many documents standardised across both authorities to ensure a consistent message is given to those consulted.
- 7.5 All affected staff, Trade Unions, Staff Side Secretary and Departmental Representatives were sent a consultation document on 22 October initiating the 30 day consultation process. A summary of comments received to date arising from consultation will be circulated to the Environment PDS Committee and the Executive & Resources PDS Committee at their respective meetings. A summary of all comments will be attached to the report that will go to the Executive on 28 November 2012, along with the Director's response. Following consultation, both boroughs will consider all comments received and review the proposals where necessary.
- 7.6 The proposed new shared parking service structure is set out in Appendix 1. This has been agreed with LB Bexley officers. Each borough will retain management oversight of the service through the Assistant Director, LB Bromley, and Deputy Director, LB Bexley. This will ensure that the needs of each borough are met through the equitable use of the shared staff. There will be an emphasis on ensuring a strong shared strategic vision for the shared service through the establishment of a structure that can commission, plan and execute a consistent quality service offer to customers across the two boroughs.

Non-Applicable Sections:	None
Background Documents: (Access via Contact Officer)	<p>Libraries – Shared Services Report DRR 11/048, 20 July 2011.</p> <p>Parking Strategy – Report ES12003, 18 January 2012.</p> <p>Report to Environment PDS Committee, 1 June 2009, 'Report of the Member Parking Working Group' (ES09053)</p> <p>http://sharepoint.bromley.gov.uk/Data/127/20090601/Agenda/7.%20Report%20of%20the%20Member%20Parking%20Working%20Group%20-%20Appendix.pdf</p> <p>http://sharepoint.bromley.gov.uk/Data/127/20090601/Agenda/\$7.%20Report%20of%20the%20Member%20Parking%20Working%20Group.doc.pdf</p>