
LONDON BOROUGH OF BROMLEY
ORGANISATIONAL IMPROVEMENT

To: Cabinet
Date: 13th May 2011
Subject: *Aligning Policy & Finance –Public Protection*
From: Chris Spellman, Organisational Improvement

1. Reason for Report

At the extended Cabinet meetings in April Members endorsed the suggested approach to take forward the issue of aligning policy and finance.

After debating and challenging across portfolios, Members identified an initial work programme of 3 service areas for high level information gathering and review.

The areas identified were:

- Finance & Procurement
- Public Protection
- Transport & Highways

Officers from the Organisational Improvement Team have worked with the service to pull together an overview of their activities, as well as financial, staffing and performance information in order that Members can determine if this area should be subject to more detailed and targeted work exploring and testing options for future service delivery, the potential to make savings or to deliver improvements to the service.

This report makes recommendations as to where this work could, subject to Member approval, be most usefully undertaken. In addition to the original scope of this work, in some instances specific policy options have been identified which, if pursued, would deliver savings.

It is also of note that work has recently been commissioned by the Director of Environmental Services to review which of the regulatory services within Public Protection have the to be delivered on a shared services basis with Bexley and/or Croydon. This work is due to be concluded in June 2011.

2. Recommendations

1) Cabinet note the high level breakdown and work of the Public Protection Division and use it to assist in determining the future strategic direction of the service and whether any further challenge or review is appropriate.

2) That Cabinet consider the initial areas for further investigation and options as set out in section 8 of this report.

3. Background Information

Local authorities first came into existence because of their public health responsibilities and in Bromley many of these duties are discharged within the Public Protection Division alongside a wide range of other more contemporary functions and powers.

The Public Protection Division employs 60 FTE staff including Environmental Health Officers, Trading Standards Officers, Enforcement Officers/Technicians and administrators. The division is recognised externally as being high performing and has won a number of high profile awards and accreditations.

Over the last 3 years the Public Protection controllable budget has been reduced by approximately 19%. The division's management structure has been flattened by removing one tier of management and reducing from 10 management graded staff to 6. The Heads of Service in each area remain partly operational and have a manager to staff ratio of between 1:8 and 1:15.

A Zero Based approach was taken by the management team in determining priority areas and identifying cuts as part of the 2010/11 '25%' budget setting process. This led to establishment posts being reduced by 10% overall with areas such as Health & Safety being reduced by as much as 33%.

The services provided by Public Protection are wide and varied and although the core statutory functions of ensuring good sanitation and controlling vermin in the borough remain, the division has evolved and expanded to meet the more contemporary needs of citizens and businesses, as well as to comply with new statutory responsibilities such as the licensing of public houses. The division also implements local policies developed by Members for example tackling rogue traders and cracking down on age restricted sales of goods.

With the abolition of Primary Care Trusts (PCTs) and Strategic Health Authorities local authorities will soon be taking on greater responsibility for protecting, improving and promoting public health. Members may wish to consider how these new responsibilities will be managed and delivered when considering future options for this division given the obvious synergies and overlap between the functions and skills of staff.

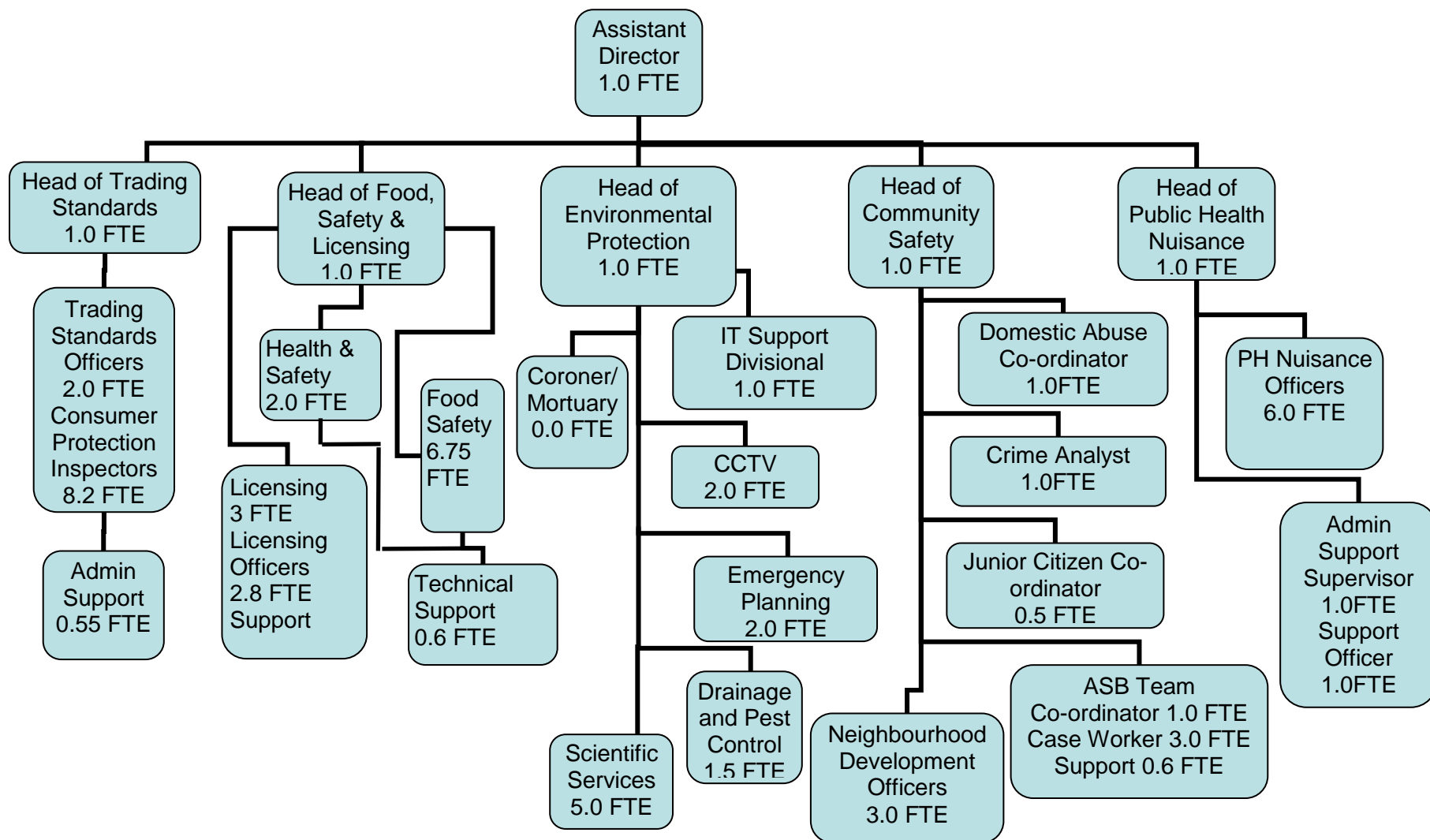
Direct control of Public Health may offer an opportunity for the division to play a greater role, either strategically or operationally, in improving public health in the Borough. The division is already commissioned by the PCT to design and deliver some project based work, such as improving the standard of food sold near schools or investigating the sale of counterfeit tobacco. In the future options may exist for efficiencies through pooling funding of some public health functions and combining the commissioning and operational delivery of services.

4. Financial Information

Public Protection - Clive Davison

	Public Protection-General	Environmental Protection	Trading Standards	Food Safety and Licensing	Public Health Nuisance	Community Safety Management & Support	Community Safety Fund	Anti - Social Behaviour Team	Community Safety - Portfolio Holder	Total
	£	£	£	£	£	£	£	£	£	£
Employees	393,870	256,950	446,210	628,760	296,650	116,430	158,420	176,940	0	2,474,230
Premises	0	0	0	0	0	0	0	0	0	0
Transport	4,790	4,870	16,570	17,340	15,850	2,080	0	0	0	61,500
Supplies and Services	91,010	31,220	12,350	5,820	6,330	87,860	16,380	0	215,780	466,750
Third Party Payments	0	167,220	0	19,100	0	0	0	0	0	186,320
Income	Cr 670	Cr 55,370	Cr 2,610	Cr 335,610	0	Cr 15,520	Cr 242,200	0	0	Cr 651,980
Controllable Budgets	489,000	404,890	472,520	335,410	318,830	190,850	Cr 67,400	176,940	215,780	2,536,820
Supplies and Services - Insurance	6,390	0	0	0	0	0	0	0	0	6,390
Non-Controllable Budgets	6,390	0	0	0	0	0	0	0	0	6,390
Recharges In	540,110	239,310	212,670	199,850	201,010	568,100	67,400	0	0	2,028,450
Total Cost of Service	1,035,500	644,200	685,190	535,260	519,840	758,950	0	176,940	215,780	4,571,660
Recharges Out	Cr 1,035,500	Cr 90,020	0	0	Cr 44,440	Cr 3,880	0	Cr 67,400	0	Cr 1,241,240
Total Net Budget	0	554,180	685,190	535,260	475,400	755,070	0	109,540	215,780	3,330,420

Staffing Structure



5. Public Protection-What does it do?

The work of the Public Protection Division is divided into the following main areas:

1. Food Safety & Infectious Disease Control
2. Licensing
3. Trading Standards
4. Health & Safety
5. Community Safety & Anti Social Behaviour
6. Public Health Nuisance
7. Environmental Protection
8. CCTV
9. Pest Control
10. Coroners
11. Emergency Planning

By definition these eleven areas are extremely broad and a single overarching summary of the division is not practical. In any event it is anticipated that Members are likely to afford greater priority to some areas than others and therefore they have been detailed at a high level individually.

This is not an exhaustive list of all activity within the division but covers the main core of work undertaken.

Food Safety & Infectious Disease

Food Hygiene Inspections

According to the Food Safety Act 1990 local authorities are required to carry out risk based inspections of food premises in accordance with statutory guidance. Premises are banded based on risk and are scheduled for inspection with a frequency of between 6 months (Cat A) and 5 Years (Cat F). There is some scope for flexibility as to how lower risk 'inspections' are carried out, by way of a form of self assessment, and the service takes advantage of this for premises below Category C.

The concept of placing information about the hygiene ratings of food businesses in the public domain has continued to gain in popularity and Bromley has supported this by participating in the Scores on the Doors (SOTD) scheme. Many believe SOTD to be a significant tool in raising hygiene standards because it utilises market factors in addition to traditional enforcement actions.

Performing food hygiene inspections, the production of inspection reports, letters, notices, follow up visits and subsequent enforcement action dominates the work of this team. Accounting for approximately 4.7FTE/70% of the resource.

Officers are also required to investigate food complaints made by members of the public and to investigate cases of suspected food borne illness reported by GPs and hospitals. A majority of complaints relate to reports of poor hygiene standards, foreign bodies found in food or where someone suspects they have contracted food poisoning from a particular establishment, and this is often the trigger for enforcement action.

Large outbreaks of food poisoning can require the involvement of the whole team as well as other qualified Environmental Health Officers for considerable periods.

2011/12 the key priorities are;

- Investigate outbreaks / cases of food poisoning
- Reduce the number of zero and One star food businesses
- Undertake risk based inspections of food businesses

Licensing

Since the introduction of the Licensing Act 2003 local authorities have been responsible for issuing, renewing and ensuring compliance of premises selling alcohol as well as the older responsibilities for gambling, fireworks, beauty treatment, sex shops, pet shops, animal boarding establishments and public entertainment. Enforcement of the smoke free legislation is also undertaken by this team but makes a minimal contribution to work loads.

Licensing activity generates £323k of income through the charging of fees which covers the direct cost of this service.

In a majority of cases license fees are set by statute and cannot be varied. Flexibility does exist in relation to some areas and this is commented on in the performance and benchmarking section.

For 2011/12 the key priorities are:

- Run Best Bar None award scheme 2011 / 2012
- Actively support selected Pub Watch meetings to assist licence holder to promote the licensing objectives
- Introduce invoicing for licence renewals
- Actively secure compliance with licensing conditions in targeted premises

Trading Standards

Business Compliance & Enforcement

The trading standard service within Public Protection is probably the greatest example of where Member and local priorities have significantly altered service provision. Following public consultation and discussions with Members some of the more 'traditional' business compliance functions, such as enforcing weights and measures legislation, have been downgraded to a de minimus level with inspections only being undertaken based on intelligence/complaints and targeted towards smaller independent retailers where levels of compliance are more mixed.

3.4 FTE are utilised in the performance of these functions.

Complaint Investigation & Education

Consumer advice is now largely dealt with by a national telephone/online consumer advice centre established in 2005. 'Consumer Direct' takes all initial calls from residents in relation to consumer advice. Only those requiring follow up action are referred on. Although complaints of unfair trading are still investigated these are filtered based on criteria such as the vulnerability of the consumer, the history of the trader, etc. This has allowed resources to be switched to both proactive and reactive work focused on the higher priority areas.

1.7 FTE are utilised in the performance of these functions.

Door Step Crime & Rogue Traders

Due to the impact of the offence, Bromley's high numbers of affluent older people tackling doorstep crime and rogue traders is a major focus for the team.

The team operate a rapid response service to reports of door step crime incidents designed to disrupt fraudulent trading practices. One officer is a specially trained fraud investigator and performs

sophisticated financial investigations with a view to recovering monies under the Proceeds of Crime Act.

Officers also carry out a programme of preventative work centred on education and target hardening of potential repeat victims.

3.9 FTE are utilised in the performance of these functions.

Underage Sales

Although there is considerable discretion for a local authority to discharge its duty in relation to age restricted sales legislation, this has been identified, in consultation with the portfolio holder, as key local issue. A programme of test purchasing of items such as alcohol, cigarettes and other items including knives are regularly undertaken both within and outside of office hours. This work is complemented by proactive advice and guidance to retailers in complying with their responsibilities.

1.4 FTE are utilised in the performance of these functions.

The 11/12 key priorities for the Trading Standards Team are be:

- Prevent older and vulnerable consumers from becoming victims of commercial crime.
- Investigate, disrupt and where possible take formal action against traders who target older and vulnerable consumers.
- Investigate, disrupt and where possible take formal action against traders who operate in the informal economy.
- Prevent the sale of age restricted products, such as alcohol, tobacco and fireworks, to young consumers in Bromley.
- Carry out a range of intelligence led enforcement activities aimed at protecting consumers and businesses in Bromley from unfair trading practices which cause consumer detriment and an unlevel playing field in the market place.

Health and Safety

The local authority has a duty to enforce Health & Safety legislation in approximately 4,000 premises, mainly shops and offices etc, across the borough. Two FTE are allocated to this function and inspect approximately 75 premises per year.

Officers in other teams (food safety and licensing) maintain a level of Health and Safety awareness during other inspections and deal with any obvious hazards that are identified. These "Hazard Spotting" visits do not form part of planned inspections or projects.

The team's work plan is driven by the nature of the premises, complaints and accident reports with main attention being given to investigating the most serious incidents and highest risk premises.

The legislation requiring local authorities to have a proactive programme of inspections is not as explicit as food safety for example. While the current resource is considered adequate by the Head of Service to demonstrate compliance with our duty any further reduction from two FTE would be difficult to justify.

Any health and safety failure at a premises for which the local authority has a duty to inspect and enforce, for example an outbreak of legionnaires disease, could of course have a very serious direct impact on the individuals involved as well as potential reputational or judicial repercussions for the authority.

For 2011/11 the key priorities will be

- Investigate serious accidents / incidents
- Investigate complaints about significant risks in workplaces
- Undertake targeted inspections / projects with high risk businesses

Community Safety & Anti Social Behaviour

The Safer Bromley Partnership, is chaired by the Portfolio Holder for Public Protection and Safety and supported by officers from the Community Safety Team and the Police. Community Safety work very closely with a range of partners including the police, health services, emergency services, probation and the voluntary sector to reduce levels of crime and anti social behaviour. Currently, the membership of the Safer Bromley Partnership includes the Council, Metropolitan Police Service, Metropolitan Police Authority, London Fire Brigade, London Probation, Bromley PCT, Community Links Bromley, UK Border and Immigration Authority, Registered Social Landlords, the Glades Shopping Centre, London Ambulance Service and Her Majesty's Court Service. The Safer Bromley Partnership is a statutory partnership, representing the Community Safety Partnership established by the Crime and Disorder Act 1998.

The Community Safety function in part is performed through the work of the in house anti social behaviour unit which contains both council employees and seconded police officers and are responsible for investigating complaints of anti social behaviour. These officers commonly work in partnership with colleagues from a range of different teams within the Division such as Trading Standards, Licensing, and the Noise Service, and also other Departments such as Children and Young People, Adult and Community Services and Renewal and Recreation.

Activities and interventions are also commissioned by way of the new Community Safety Fund now contained within Area Based Grant. Details of planned activity this year which have been set based on local priorities are given below:

- Domestic Abuse Strategy Co-ordinator
- Operation PAYBACK Support - Restorative Justice
- Safer Neighbourhood Officers
- Junior Citizen Scheme
- Young Victims' Project

Future funding will be made available from Police and Crime Commissioners and, for 2011/2012, through the Greater London Authority. The expectation is that the available budget for 2012/2013 will represent a 60% cash reduction on the 2010/2011 baseline. In anticipation of this projects have sustainability criteria built in at the initial funding stage.

The Home Office, as part of the current consultation process in relation to tackling Anti-Social Behaviour, has stated that it does not anticipate significant changes to resourcing at local levels in tackling Anti-Social Behaviour. There is also an indication that other central government budget allocations, currently ring fenced, will be made available to Community Safety Partnerships.

The local priorities, based on the findings of the Partnership Strategic Assessment (examines crime and disorder data and analysis) are as follows:

- Reduce Crimes Against Property
- Reduce Crimes Against the Person
- Reduce Anti-Social Behaviour
- Increase Public Confidence.....

In addition, the Partnership has prioritised intelligence gathering and development in the areas of Terrorism and Drug and Alcohol related crime.

Public Health Nuisance

The Public Health Nuisance Team investigate complaints of statutory nuisances including noise arising from domestic and commercial premises, accumulations of rubbish on private land, smoke and ash nuisance from domestic and commercial bonfires, obtrusive lighting, filthy and verminous premises and incidences of flytipping on private land.

The legislation requiring these issues to be investigated states that the Local Authority has a duty to investigate every complaint of nuisance received from a local resident but does not specify what steps must be taken when investigating. Therefore the local authority can have discretion when setting its policy in this area and consequently service provision varies widely both within London Boroughs and nationally.

Approximately 5,000 public health nuisance complaints were received in 2010/2011 of which 77% were noise related matters. Bromley is one of the 31 London Boroughs who provide an out of hours noise service with a proactive 'party patrol' operating on Saturday nights in addition to a varying levels of a 24/7 call out service. Some provide 100% cover with a shift system, whilst others, like Bromley only provide an on call service in relation to certain specific noise problems. This provision is in response to nearly 3,000 noise complaints being reported out of normal office hours.

Demand on this service has been increasing year on year with a strong upward variation in the summer months. This is reflected on in the recommendations section of this report.

Although the service is primarily a statutory service at least one neighbouring authority has opted to reduce this service.

With the introduction of the clean Neighbourhoods Act in 2005 additional resources were directed towards cracking down on a wide range of enviro-crime issues including flytipping. Officers within this team liaise with officers in Street Services, the anti social behaviour team, safer neighbourhood teams and trading standards in order to coordinate related enforcement work in this area.

For 2011/12 the key priorities are:

- Investigate and take formal action against persistent noise offenders whilst empowering others bothered by noise to take their own initial action.
- To ensure that the out of hours noise service is value for money and adequately reflects demand
- Investigate, disrupt and take formal action against those persons involved in both the carriage of and the illegal disposal of controlled waste, targeting flytipping hotspots in the borough including service road and alleyways.
- Continue to provide appropriate publicity and information to the public when offenders of both noise nuisance and waste related offences have been prosecuted

Environmental Protection

Environmental Protection encompasses a range of functions which consume time and resource roughly evenly within the team.

- Air

The local authority is required to publish, implement, monitor and review an Air Quality Strategy. In order to monitor progress the lowest cost method of assessment has been employed and computer modelling will be used as far as possible. This decision has been the subject of challenge by both local and national environmental groups.

Ultimately if the UK is held not to be meeting their obligations by Europe they could face fines of up to £300 million which could be passed on to local authorities. London is currently the only region not in compliance. Central government are currently disputing and resisting the timescales and threat of financial sanctions.

- Authorised Processes

Local authorities are also required to inspect and issue permits to a number of types of industry that involve certain prescribed processes. The processes are very clearly specified along with the frequency of inspection/renewal. Fees are set centrally and cannot be varied.

- Land

There is a statutory requirement to keep (and update) a contaminated land registry.

Providing a service for Contaminated Land (investigation, enforcement and remediation, Register, risk assessments, GIS mapping and Strategy) is Statutory.

- Water

The local authority has a statutory duty in relation to private water supplies but the numbers of these in Bromley are so low they do not materially contribute to the workload of this team.

Traditionally Bromley, like many other local authorities, have tested the quality of swimming pool water and the team have a number of small contracts to perform assessments of bathing water quality for a number of leisure providers. Notice has recently been given to terminate this arrangement by the biggest client (MyTime) as the council facilities are not officially accredited. The service is currently looking to compete for additional business in this field in order to cover the cost of the service. There is no statutory responsibility to provide this service.

A service level agreement to test water tanks for legionnaires disease has also recently been agreed with Property Services. This function was previously commissioned by Property from the private sector and the SLA represents a savings from the previous contract. The service now intends to compete for additional external business. There is no statutory responsibility to provide this service.

- Asbestos

The service has recently started being commissioned by the Property Division to provide asbestos surveys of the local authority stock. This was previously commissioned from the private sector and represents savings compared to the previous contract. The service now intends to compete for additional external business. There is no statutory responsibility to provide this service.

- Planning Consultations

Applications for planning permission with the potential to impact on the environment or be affected by the existing environment are sent for comment from an environmental health perspective. This function requires the input of approximately 0.5 FTE and is as a proactive mechanism to prevent future environmental health issues which will impact on residents' lives and require reactive input from council services.

Currently no specific charge is made to the developer/or recharge to the planning team for this service. Forthcoming changes to the charging structure for planning applications may offer an opportunity to alter this.

- Drainage And Pest Control

The Council has a statutory responsibility to investigate and where necessary take enforcement action in relation to both drainage and pest control. In some cases the investigation component can be very lengthy.

As with the investigation of statutory nuisances, service provision varies widely in this area from some authorities who offer free clearance services, to local authorities who refer everyone to a private contractor, such as Bromley, although in some cases we will serve a formal notice works to be carried out and then charge for all aspects of this process.

A forthcoming change to the legislation relating to drainage may pass more responsibility to the water authority and may have an effect on the future demand in this area. The service is currently investigating if charges can be levied for other aspects of the service from the initial investigation and

improving public information sites available to the public, to help them remedy the situation directly themselves.

The pest control service, with the exception of our statutory duty to keep council land clear of all rodents and to investigate complaints reported to us of rodent infestations, is delivered by an external contractor including the initial customer contact and appointment booking service.

This contract is let at nil value with the contractor keeping the revenue generated by the chargeable service and subsidising Bromley residents who are on benefits. The contract expires in 2012 and the service is currently investigating how greater value can be achieved by agreeing a revenue share with the supplier.

Stray & Abandoned Dogs

The service is responsible for Bromley's statutory duties relating to stray & abandoned dogs. A number of initiatives are currently being investigated by the service to control and reduce the expenditure in dealing with this service, as stray and abandoned dogs have increased from 60 pa to 600pa in the last three years.

The dramatic increase is in part thought to be as a result of historic under reporting by the police who previously had responsibility for this function. Additionally the recent social trend of 'trophy dogs', often associated with irresponsible dog ownership, has also contributed to the rise

Emergency Planning

Emergency Planning is the process whereby the Council prepares itself to deal with major emergencies and incidents and assist in the welfare and recovery of the community. The aim of Emergency Planning is to maintain appropriate arrangements and procedures that enable the council to respond to and manage major incidents. Contingency plans are prepared for a range of hazards in our community including large scale events, industrial accidents and flooding in cooperation with organisations such as businesses, the Environment Agency, volunteer groups and the emergency services. The Unit has one officer currently in post and one vacancy.

Maintain the statutory emergency planning and business continuity arrangements for Bromley.

CCTV

Bromley operates a network of public space CCTV cameras in its major town centre areas.

The main aims of the CCTV system are: to discourage all types of criminal activity in the area, to assist the Police in providing a swift response to criminal and anti social activity, to promote a safer environment for all members of society and the business community e.g. alerting the emergency services in the event of fire, road traffic accidents or people needing assistance.

The camera network is also used for the enforcement of traffic offences and has an income target of £850k including mobile and bus lane cameras.

The camera infrastructure is owned, managed and maintained by the local authority directly.

Monitoring is provided by way of a contract (NSL Ltd.) and is carried out 24/7, 365 days per year. Bromley recently reduced the monitoring by 33% from three operators to two operators.

Public Protection is currently carrying out a review of CCTV looking at alternative provision, rationalising and sharing monitoring functions and facilities and the processes within the Council and

with external partners. A joint CCTV maintenance and monitoring contract has already been agreed between Bromley and the London Borough of Lewisham and is likely to go ahead this year.

There is no statutory requirement to operate a CCTV network although it is highly valued by local residents, the police and retail businesses in the areas covered.

Coroner and Mortuary Services –

Bromley Council is responsible for the Bromley element of a regional consortium which jointly runs and finances the Statutory functions of the HM Southern Coroners service.

Environmental Protection Key Priorities 2011/12

Coroner and Mortuary Services

- Reduce running costs of the Coroners Service.

Environmental Protection

- Complete the Statutory Detailed Screening and Assessment for the Air Quality Management
- Ensure monitoring of air quality at the Borough's continuous monitoring site and high traffic junctions.
- Carry out a Contaminated Land Risk Assessment and develop map of contaminated sites for identification of the risks.
- Develop a system for the statutory monitoring of private water supplies and distribution systems.
- Ensure registration and renewals for all Authorised Processes in Bromley.
- Set up a service for the investigation and reporting on asbestos in LBB properties and develop related income generation services in the private sector.
- Advise residents on the handling and disposal of asbestos cement products
- Maintain the advice on the Bromley web site.

Drainage and Pest Control

- Carry out all investigations and enforcement in relation to pest control and drainage problems.

Stray & Abandoned dogs

- Develop systems to reduce the running costs involved in meeting the statutory responsibilities for stray and abandoned dogs.

Emergency Planning

- Enhance and maintain the organisation's emergency planning arrangements both for local and regional emergency response.

CCTV

- Introduce joint contracts with adjoining boroughs for the operation of CCTV services in Bromley

6. Performance Information & Benchmarking

Considerable variations in the pattern of environmental health structure and provision occur for both strategic reasons, such as Bromley's decision to manage private sector housing within ACS, and because there are considerable differences in the challenges facing councils across the country. The pressures from natural and man made hazards are such that each local authority has to fix its own priorities for maintaining environmental standards within its own area. This makes the practice of unqualified comparisons between authorities dangerous, and perhaps obscure.

Therefore the summary below draws on benchmarking performance and cost data where it is considered reliable and relevant but mainly focuses locally and internally on what we have achieved against our own standards and priorities where they have been set.

As part of the recently commissioned investigation into the potential to share a number of 'regulatory services', many of which reside within public protection, useful staffing, financial and performance data

is currently being pulled together from Bexley and Croydon by the Organisational Improvement Team and Assistant Director, Public Protection. This information will be available from the end of May and may assist Members in the future when evaluating how we are using resources.

- Food Safety

A very high proportion of food safety Inspections/Interventions programmed to be performed according to the statutory codes of practice are carried out as scheduled. Overall 93% of programmed interventions are delivered on time and when broken down by risk category this figure is very close to 100% in all but the lowest risk category (F).where it is 71%. Although performance across most London boroughs is good, this places us in the top quartile.

Interestingly a number of boroughs do achieve considerably less (56% London Borough of Barnet, 53% London Borough of Brent). On analysis of the risk categories these lower performing authorities appear to have made a strategic choice regarding which premises are prioritised to be inspected and the intervals determined by the Codes of Practice. London Borough of Barnet achieves 100% of the top two risk categories, and only 4% of the lowest. Similarly Brent achieve 90%+ for the two highest and only 9% for the lowest risk.

This option is not without both reputational and potentially judicial risk. Most notably if a serious food poisoning outbreak were to arise at a premise which had not been inspected as programmed.

It should also be noted that inspections not performed as scheduled are added to the following year's target and therefore over time relative performance would decline exponentially. The Food Standards Agency ultimately has powers to take direct control of services they consider to be failing although this only appears to have occurred on a small number of occasions.

- Licensing

No specific performance or cost benchmarking data is available for this service. Although this will be forthcoming as part of the shared services work.

Bromley has chosen to set its fees in the middle of permitted bands for premises/activities where the law allows local flexibility. London wide/National benchmarking has also not been undertaken in relation to these fees. Based on comparisons with Bexley & Greenwich there would appear to be scope to review our license charges in order to more fully cover the cost of the service.

- Trading Standards

The service voluntarily takes part in a programme of peer review against the following criteria:

- Leadership
- Policy and Strategy
- People Management
- Partnerships and Resources
- Processes
- Customer Results
- People Results
- Society Results
- Key Performance Results

Results of the reviews are extremely positive. Acknowledging several areas of best practice in London and in some cases disagreeing and upgrading the scores provided as part of the self assessment process.

- Health & Safety

No specific external performance or cost benchmarking data is available for this service although it is known that neighbouring boroughs combine this function with their corporate health and safety responsibility to maximise efficiencies and make use of specialist resources.

The internal targets set for inspection and investigations last year were partially met. This failure to achieve the projected level of output is related to the resources in the team being reduced by one FTE (33%) and the post deleted mid year.

- Community Safety & ASB

Positive progress that has been made in reducing crime and disorder over the past three years and this trend is continuing.

There have been sustained reductions in Serious Acquisitive Crime and Serious Violent Crime, Criminal Damage and gun and knife related crime. The positive work in relation to Domestic Abuse also continues to provide benefits and the figures for problematic drug users in treatment are also reassuring. In relation to Anti-Social Behaviour, there has been consistent good performance in relation to the proportion of applications for ASBOs that are granted, the proportion of ASBO cases where there are detected breaches and the number of those that result in Court Action.

In anticipation of the proposals contained within the Home Office Consultation “More Effective Responses to Anti-Social Behaviour”, the focus of the Partnership ASB Team has been reviewed to enable a two tier response based on geographic interventions (Place) and individual interventions with perpetrators (People).

- Public Health Nuisance

Some specific external performance or cost benchmarking data is available for this service but only in relation to noise. A benchmarking exercise was carried out for the out of hours noise service and the total noise service was one of the cheapest among neighbouring London Boroughs. The average per London Borough for the Out of Hours service being £107,478 and Bromley's cost being £33,210 pa. For the full noise service the costs were £637,500 and £145,000 respectively.

Further benchmarking for the service more generally may be forthcoming as part of the shared services work.

Level of noise service provision can be compared and is amongst the most comprehensive in London. Boroughs with even greater levels of cover and responsiveness are those London Boroughs which are very different in character to Bromley. In these instances officers work on a 24hr shift basis rather than a traditional working week supported by a ‘call out’ service.

Performance against internal standards for response times and enforcement action are consistently achieved across all areas.

- Environmental Protection

CCTV

There have been a number of benchmarking exercises carried out in relation to the CCTV service in Bromley. Direct cost comparisons can be difficult, as different Local Authorities exclude certain costs when publishing their statistics for this service.

The attached table was produced using the results of the Big Brother watch FOI requests of Bromley and other identified cluster Boroughs and shows CCTV combined Monitoring & Maintenance costs.

Borough	3 year costs	number of cameras
Barnet	£3.1m	127
Bexley	£2.4m	240
Bromley	£1.6m	170
Croydon	£2.5m	103
Ealing	£2.7m	394
Enfield	£3.14m	135
Hillingdon	£2.4m	160
Hounslow	£3.6m	n/a
Lewisham	£1.8m	167
Merton	£2.5m	135
Redbridge	£2.1m	668
Sutton	£1.3m	73

Scientific Services

The asbestos surveying service for the properties owned by the London Borough of Bromley has historically been carried out by external contractors; however, a benchmarking exercise in Public Protection identified that this service could be carried out more efficiently and at a cheaper rate internally by the Scientific Services Officers within Protection. The resources have now been re aligned to produce a saving for the Council.

The cluster group local authorities for air quality have bench marked the costs of the Integrated Pollution Prevention Control (IPPC) permitting system and now use the London fire brigade to carry out the permitting for petrol station emissions and the price was with the LFB, based on all members of the cluster group authorities joining up to carry out their IPPC permitting for petrol stations using the same system. The benchmarking exercise was subsequently extended to the IPPC for dry cleaning establishments using an external contractor; however, it was concluded that the statutory fee set by the Government was not sufficient to cover the cost of an external contractor for this particular element of IPPC.

Further benchmarking information for other functions within this service area generally may be forthcoming as part of the shared services work.

Areas for Further Investigations & Initial Options

1) Food Safety

Members may wish to consider the resources directed towards the food safety function in order to achieve our high performance given the risks any alteration would carry, the performance of other local authorities, and issues such as schemes to harness market forces as an alternative mechanism to raise standards. Estimated potential saving £40-60k

2) Licensing

Members may wish to consider reviewing license fees where this is permissible as a mechanism to generate additional income. Estimated potential income £15-20k

3) Community Safety

The commissioning of Community Safety Fund projects is currently being reviewed by the Portfolio Holder and can be varied dependent on Member priorities.

The review will take account of the anticipated reduction in Government Grant but will also reduce the levels of commissioned services in order to generate savings within core budget. A more rationalised and intelligence led approach will be applied to commissioning future interventions.

4) Public Health Complaints

Noise Service

Members may wish to reconsider the provision of a 24hr/365 day noise service. Options to withdraw or reduce out of hours cover to peak periods only would deliver potential saving of up to £30k.

5) Environmental Protection

Members may wish to move chargeable/non statutory services within Environmental Protection (swimming pool water testing, Asbestos surveys, etc) onto a trading account in order to give greater transparency of cost and income and to incentivise the service to become self funding.

Officers also intend to investigate the ability within new planning legislation for environmental health consultation costs to be built into the application fee and recovered from the developer. Estimated saving/income £20k.

6) CCTV

Public Protection is currently carrying out a review of CCTV looking at alternative provision, rationalising and sharing monitoring functions and facilities and the processes within the Council and with external partners. A joint CCTV maintenance and monitoring contract has already been agreed between Bromley and the London Borough of Lewisham and is likely to go ahead this year.

Members may wish to consider the appropriateness of reducing the CCTV monitoring contract given the views of the Police and the Safer Bromley Partnership and the potential risks and interdependencies with schemes such as Shop Safe Radio and the substantial parking income that is generated through CCTV enforcement.

This issue, along with the potential for monitoring and support to be joined up/shared with other local authorities and partners is currently being considered under the above mentioned review.