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# Environmental Health follow-up review – **Blaenau Gwent County Borough Council**

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Mae'r ddogfen hon hefyd ar gael yn Gymraeg. This document is also available in Welsh. Delete if not applicable.

The team who delivered the work comprised Ginette Beal and Lidia Vorontsova of Grant Thornton LLP under the direction of Non Jenkins and Sara-Jane Byrne.

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# Summary report

## Summary

### What we reviewed and why

- 1 As part of his 'delivering with less' series of Local Government Improvement Studies, the Auditor General published his report, Delivering with less – the impact on environmental health services and citizens, in October 2014.
- 2 In this report, the Auditor General drew attention to recent and forthcoming legislation, and the concerns of Councils that they would be unable to deliver the commitments contained within it. Many of the legislative proposals referred to in the Auditor General's 2014 report have subsequently been implemented, including the Housing Act (Wales) 2014 and the Renting Homes (Wales) Act 2016. The Public Health (Wales) Act was also passed in 2017.
- 3 The Auditor General also published local reports for each Council as part of the 2014 study.
- 4 In a letter to local authority Chief Executives on 11 January 2018, the Auditor General set out his intention to undertake some thematic work more closely aligned to his programme of Local Government Studies. The purpose of aligning thematic work more closely to Local Government Studies programme is to make the most effective use of audit resources in discharging the Auditor General's duties whilst ensuring that issues, themes and learning identified in Local Government Study reports are 'followed-up' and explored with councils locally in subsequent years.
- 5 This review assessed whether there have been any budget and staff changes within the Council's environmental health services and the extent to which it has addressed the recommendations included in our 2014 national report. For the purposes of this review, we focussed on the Council's progress in addressing recommendations 2,3,4, and 5 of the national report.
- 6 The report contained six recommendations that are set out in Exhibit 1 below:

#### Exhibit 1 – recommendations made in 2014 national report, Delivering with less – the impact on environmental health services and citizens

Recommendation	Responsible Partners
R1 Revise the best practice standards to: <ul style="list-style-type: none"><li>• align the work of environmental health with national strategic priorities;</li><li>• identify the wider contribution of environmental health in delivering strategic priorities of the Welsh Government; and</li><li>• identify the benefit and impact of environmental health services on protecting citizens.</li></ul>	Councils, Chartered Institute of Environmental Health Cymru

Recommendation	Responsible Partners
R2 Provide scrutiny chairs and members with the necessary skills and support to effectively scrutinise and challenge service performance, savings plans and the impact of budget reductions.	Councils, Welsh Local Government Association
R3 Improve engagement with local residents over planned budget cuts and changes in services by: <ul style="list-style-type: none"> <li>• consulting with residents on planned changes in services and</li> <li>• using the findings to shape decisions;</li> <li>• outlining which services are to be cut and how these cuts will impact on residents; and</li> <li>• setting out plans for increasing charges or changing standards of service.</li> </ul>	Councils, Welsh Local Government Association
R4 Improve efficiency and value for money by: <ul style="list-style-type: none"> <li>• identifying the statutory and non-statutory duties of council environmental health services.</li> <li>• agreeing environmental health priorities for the future and the role of councils in delivering these.</li> <li>• determining an 'acceptable standard of performance' for environmental health services (upper and lower) and publicise these to citizens.</li> <li>• Improving efficiency and maintaining performance to the agreed level through:               <ul style="list-style-type: none"> <li>– collaborating and/or integrating with others to reduce cost and/or improve quality;</li> <li>– outsourcing where services can be delivered more cost effectively to agreed standards;</li> <li>– introducing and/or increasing charges and focusing on income-generation activity;</li> <li>– using grants strategically to maximise impact and return; and</li> <li>– reducing activities to focus on core statutory and strategic priorities.</li> </ul> </li> </ul>	Councils, Welsh Local Government Association, Welsh Government
R5 Improve strategic planning by: <ul style="list-style-type: none"> <li>• identifying, collecting and analysing financial, performance and</li> </ul>	Councils

Recommendation	Responsible Partners
demand/need data on environmental health services; <ul style="list-style-type: none"> <li>• analysing collected data to inform and understand the relationship between ‘cost: benefit: impact’ and use this intelligence to underpin decisions on the future of council environmental health services; and</li> <li>• agree how digital information can be used to plan and develop environmental health services in the future.</li> </ul>	
R6 Clearly set out the expectations of council environmental health services under new housing and health legislation and agree how these new duties will be delivered.	Welsh Government, Welsh Local Government Association

7 We undertook this review during the period July to August 2019.

## What we found

8 Our review sought to answer the question: **Has the Council acted upon the recommendations in the Auditor General’s Environmental health – Delivering with Less report published in October 2014?**

9 Overall we found that: **The Council has made progress in addressing the recommendations raised in 2014. Collaborative working with Torfaen CBC to date has contributed to the Council’s ability to deliver with less. Following the withdrawal from the arrangement in November 2019 the Council will face additional financial and operational pressures that may affect its ability to continue providing environmental health services to the same standard.**

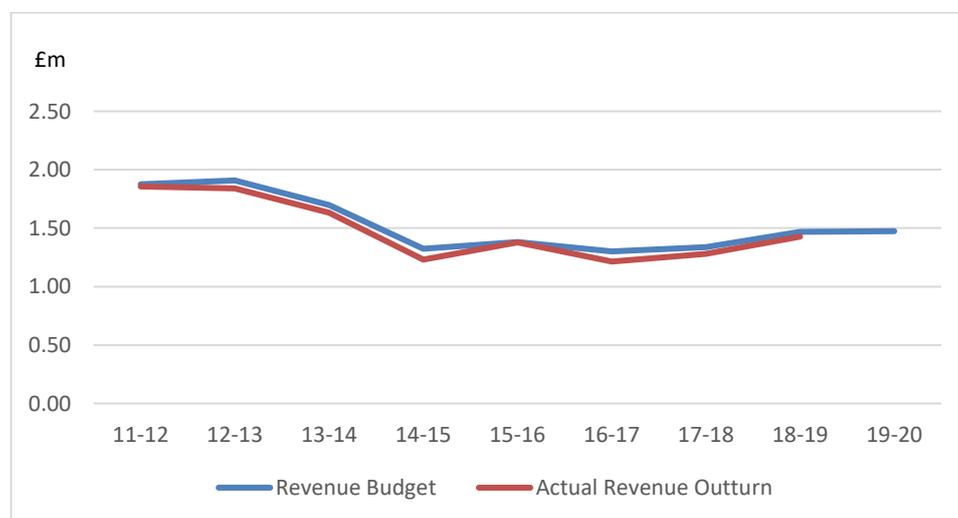
10 We reached this conclusion because:

- Environmental health services are routinely considered by the Council’s scrutiny arrangements. Support to Members is provided proactively and training compares well against what has been observed elsewhere.
- Frontline environmental health services have not been subject to budget cuts in this period, although residents have been consulted on changes.
- The Council has identified its statutory and non-statutory duties and self-assessed against the Best Practice Standards. Environmental health priorities have been agreed and documented in the service business plan.
- The Council has improved efficiency and maintained performance via outsourcing of services and collaborative working with Torfaen CBC. Following termination of the joint working arrangement the Council will face

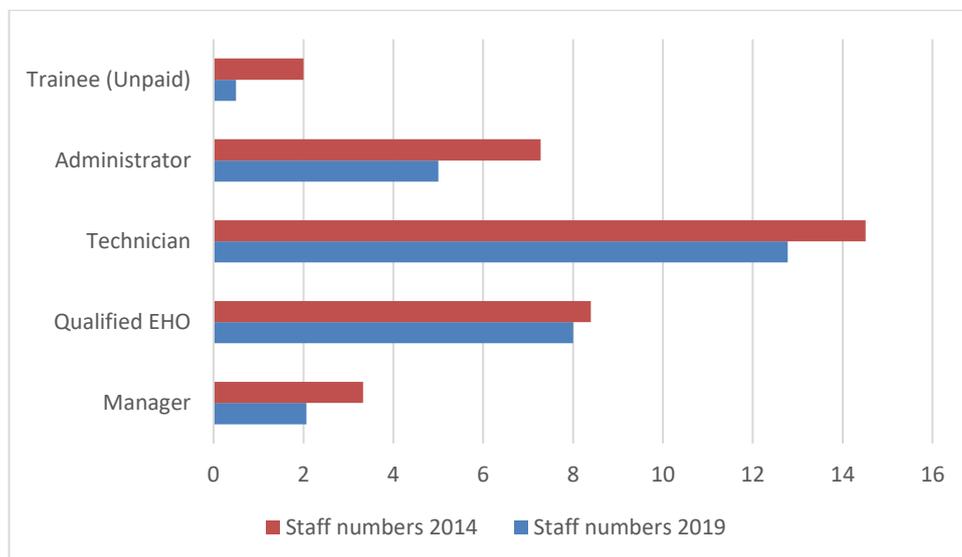
additional financial pressures and should consider how services may need to change as a result.

- Environmental health service objectives are aligned to corporate and well-being objectives. The Council currently makes limited use of technology and ICT in service delivery.
- To date, budgets for environmental health services have reduced from £1.7 million in 2013-14 to £1.5 million in 2019-20 (please refer to Exhibit 2), which represents a reduction of approximately 13.5%.
- Staff numbers have reduced from 35.5 FTE in 2014 to 28.4 FTE 2019 (please refer to Exhibit 3).
- In 2015, Blaenau Gwent CBC and Torfaen CBC established a joint Trading Standards and Licensing service, which was extended to include Environmental Health in 2016.
- Both Councils realised financial savings through introduction of a shared management structure in June 2016, reduction of posts and cross-Council working. This is supported by a 38% reduction in Manager grade FTE, as well as 31% reduction in Administrator grade FTE since 2014.
- Originally, both Councils were looking to develop the working relationship into a fully shared service. In July 2019, the Blaenau Gwent CBC Executive approved the decision to withdraw from the arrangement.
- The financial impact of this decision has been estimated as £35,000 in 2019-20 and £100,000 recurring each year thereafter.
- The Council is considering reconfiguring its service. Options include seeking a partnership arrangement with a different Council.

Exhibit 2 – the net cost of environmental health services: revenue budget compared to outturn, 2012-13 to 2019-20



### Exhibit 3 – staff numbers (full time equivalents) 2014 compared to 2019



## Proposals for Improvement

### Exhibit 1: proposals for improvement

The table below sets out the proposals for improvement that we have identified following this review.

Proposals for improvement	
P1	<p>The Council should ensure that it has assessed the impact of withdrawing from the collaborative working arrangement with Torfaen CBC on the financial and operational sustainability of the environmental health service. It also needs to consider how to continue to respond to the Council's budget challenge and to new legislation. This may include:</p> <ul style="list-style-type: none"><li>• seeking new partnership agreements with other Authorities (ensuring that appropriate governance arrangements are in place);</li><li>• review of existing contracts with third party providers to maximise income generation opportunities; and</li><li>• transformation and innovation, such as use of digital intelligence to predict future patterns of service delivery and/or inform decision-making around service provision.</li></ul> <p>In reconfiguring the service, the Council should ensure that statutory powers and duties are sufficiently prioritised alongside discretionary areas.</p>

# Detailed report

The Council has made progress in addressing the recommendations raised in 2014. Collaborative working with Torfaen CBC to date has contributed to the Council's ability to deliver with less. Following the withdrawal from the arrangement in November 2019 the Council will face additional financial and operational pressures that may affect its ability to continue providing environmental health services to the same standard

Environmental health services are routinely considered by the Council's Scrutiny arrangements. Support to members is provided proactively and training compares well against what has been observed elsewhere

11 In reaching this conclusion we found that:

- environmental health matters are considered by the Environment, Regeneration and Economic Development Committee.
- Member training is provided via briefing sessions, either requested by Members or proposed by the service.
- in 2018-19, sessions delivered covered the following:
  - Environment Act Duty;
  - Development of a Local Toilet Strategy;
  - Side Waste Enforcement Update.
- the Committee does not routinely self-assess its effectiveness.
- there is a Council-wide Annual Scrutiny Evaluation process with Member feedback gathered via a questionnaire.
- however, we note that participation in 2018-19 was low, with only 9 responses received out of 34.

Frontline environmental health services have not been subject to budget cuts in this period, although residents have been consulted on changes.

12 In reaching this conclusion we found that:

- the Council consulted local residents on the following changes to the service:
  - collaborative enforcement policy with Torfaen;

- local toilet strategy; and
  - changes to the taxi policy.
- results of these consultations were presented to the relevant Scrutiny committees and used to shape the decision-making process.
- the Council previously introduced charges for its Pest Control service, however the arrangements for the services have since been reconsidered – this is discussed in further detail in [paragraph 14](#).

## The Council has identified its statutory and non-statutory duties and self-assessed against the Best Practice Standards.

### Environmental health priorities have been agreed and documented in the service Business Plan

13 In reaching this conclusion we found that:

- the Council separates services into non-statutory priority, non-statutory non-priority, statutory prescribed and statutory choice.
- 11 strategic priorities for the service have been agreed and documented in the Public Protection Business Plan 2018-2022. Progress against achieving these is assessed on a quarterly basis.
- the environmental health service has self-assessed against the Best Practice Standards and has met the 'required' standards across most environmental health services, with many achieving one or more aspects of the 'better' standard.
- acceptable standards have been defined internally through a set of KPIs, but have not been publicised.

## The Council has improved efficiency and maintained performance via outsourcing of services and collaborative working with Torfaen CBC. Following termination of the joint working arrangement the Council will face additional financial pressures and should consider how services may need to change as a result

14 In reaching this conclusion we found that:

- the Council has served notice to exit its joint working arrangement with Torfaen CBC in November 2019. This will lead to further financial pressures.
- collaborative working has, to date, allowed the Councils to improve efficiency and maintain or improve performance, including key PAMs relating to environmental health.

- it should be noted that performance against PAM/013 (% empty properties brought back into use) and PAM/023 (% food establishments that meet food hygiene standards) remains below Welsh average.
- the Council outsources its Pest Control service to Mitie and its Litter and Dog Control Enforcement service to Kingdom.
- performance of both third party contractors is reviewed annually by Scrutiny.
- we note that the latest Scrutiny review identified that the enforcement service only generated a small surplus for the Council after Kingdom charges. Initiatives to increase income are being discussed.
- the environmental health service is not in receipt of significant amounts of grant funding.
- budget cuts to date have focussed on staff reductions. The Council ceased provision of discretionary Pest Control activities in 2014 but reintroduced this due to an increase in public health issues.

## Environmental health service objectives are aligned to corporate and well-being objectives. The Council currently makes limited use of technology and ICT in service delivery

15 In reaching this conclusion we found that:

- the service reviews its performance against achieving strategic objectives on a quarterly basis.
- this includes review of financial and performance (qualitative and quantitative) data.
- costs, benefits and impacts are considered within the budgeting process in relation to growth or funding reductions.
- we note, however, that the decision to enter or exit the joint service arrangement was not subject to an options appraisal or a cost/benefit analysis. There was no Joint Working Agreement or other formal governance arrangement in place between the two Councils.
- use of digital technology is currently limited. We noted that an incident reporting app is being developed for Streetscene services.

Wales Audit Office  
24 Cathedral Road  
Cardiff CF11 9LJ

Tel: 029 2032 0500

Fax: 029 2032 0600

Textphone.: 029 2032 0660

E-mail: [info@audit.wales](mailto:info@audit.wales)

Website: [www.audit.wales](http://www.audit.wales)

Swyddfa Archwilio Cymru  
24 Heol y Gadeirlan  
Caerdydd CF11 9LJ

Ffôn: 029 2032 0500

Ffacs: 029 2032 0600

Ffôn testun: 029 2032 0660

E-bost: [post@archwilio.cymru](mailto:post@archwilio.cymru)

Gwefan: [www.archwilio.cymru](http://www.archwilio.cymru)