

# Report to Cabinet

<b>Report Title</b>	<b>Restructure of Community Protection &amp; Enforcement Services</b>				
<b>Date of Meeting</b>	22 January 2025				
<b>Report Author</b>	Michael Dineen, Assistant Director for Investigation, Enforcement & Community Protection, Corporate Services				
<b>Corporate Director</b>	Daniel Fenwick, Executive Director Corporate Services and Monitoring Officer				
<b>Lead Cabinet Member(s)</b>	Councillor Victoria Holloway, Cabinet member for Place & Environment				
<b>Why is this a key decision?</b>	<table border="0"> <tr> <td>1. Expenditure over £500K</td> <td>No</td> </tr> <tr> <td>2. Significant impact on 2 or more wards</td> <td>Yes</td> </tr> </table>	1. Expenditure over £500K	No	2. Significant impact on 2 or more wards	Yes
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2. Significant impact on 2 or more wards	Yes				
<b>Wards Affected</b>	All				
<b>Identify exempt information and exemption category</b>	Choose an item.  <i>Not Exempt</i>				

<b>Is report Urgent?</b>	No		
<b>Reasons for urgency (only where applicable)</b>	N/A		
<b>Appendices (if any)</b>	<table border="0"> <tr> <td>1. Current Structures</td> </tr> <tr> <td>2. Proposed Structure</td> </tr> </table>	1. Current Structures	2. Proposed Structure
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## 1. Executive Summary

- 1.1 This paper introduces the new structure and direction of the teams within scope. This moves away from the current position where the 13 separate services are spread across 2 different directorates. The current model does not allow for the ease of information sharing or fully support or enable teams

to see 'the bigger picture' of particular issues and working collaboratively to resolve issues in the long term.

- 1.2 The underlying principles of the proposals are to create a borough wide community protection and enforcement service that:
  - a. has a cross cutting approach when addressing the issues of Thurrock's communities and residents and create new teams capable of meeting this aim.
  - b. to adopt a data and local intelligence driven approach that connects with local communities building on the locality-based model used in parts of the council;
  - c. to create resilience within teams through the service's greater scale and resources, bringing together complementary skills and experience;
  - d. To create greater opportunities for career development and job satisfaction through sharing resources and expertise and seeking to solve underlying problems in our borough.
- 1.3 This is an ambitious plan that aligns to the Council's operating model and the administration's priority to increase engagement with communities. The whole plan will be delivered in phases over a period of 12-24 months. The first phase, which is the subject matter of this consultation document, is to create the teams, roles and structure that will deliver the new model.
- 1.4 The second phase of this proposal will take place, and will concentrate on the operating model of the service area, with 'community areas' being created and strategies being formed with the input from local community forums, partners and stakeholders

## **2. Recommendations**

For the reasons set out in this report, the Cabinet is recommended to:

- 2.1 **Agree the changes being proposed and approve the future development of this area in a phased approach.**

### 3. Commissioner's Comments

The restructure outlined in the report delivers on the savings as agreed in the provisional budget papers to Scrutiny of the 20<sup>th</sup> November 2024; this identifies £463,461 savings against a £500,000 target. It is critical that the review of the HRA and General Fund recharges is complete to ascertain how much further savings can be made from appropriate charges to the HRA.

### 4. Proposals – the rationale and evidence for the recommendations

4.1 Currently the Councils enforcement functions are split between two separate directorates within the Council; Corporate Services & Place and for clarity the service areas in scope are.

- i. Trading Standards
- ii. Licencing
- iii. Environmental Protection
- iv. Health & Safety
- v. Food Safety & Contagious Diseases
- vi. Private Sector Housing Licensing & Enforcement
- vii. Environmental Enforcement
- viii. Civil Parking & Moving Traffic Enforcement
- ix. CCTV Operations
- x. Community Safety
- xi. Housing Safeguarding
- xii. Anti-Social Behaviour Team
- xiii. Emergency Planning & Resilience

4.2 Having these teams fragmented across the Council has created siloed working practices. The teams, although having similar issues in terms of offending and solutions, do not come together to find 'the **best** solution' and often solve issues with singular strategies, without co-ordination across all of those areas that *could* assist.

4.3 An example of this could be seen with how street drinkers are simply dealt with by the environmental enforcement team by way of a Fixed Penalty Notice under the Public Space Protection Order that is in place for this 'offending',

with licencing (where they bought the alcohol whilst drunk), CCTV operators (who would be able to identify locations quickly through visual investigations), Community Safety Officers (who will liaise with Policing partners who may have further intelligence about the individuals) are not spoken to.

- 4.4 This method of working does not 'solve' the issue, it simply moves it to a location outside of the PSPO as there is no 'wider response'.
- 4.5 The teams also have varied levels of community engagement, with strategies for each individual team being created in isolation to others and with varied levels of community input. This creates a strategy being formed that creates a 'this is what we do...' strategy, without collaborative thinking or input from others.
- 4.6 This proposal will seek to bring together the teams identified in 2.1 and enable the senior management team of these service areas to create group strategies. These will focus on 'solution-based outcomes' with these strategies being co-ordinated and structured that cater for the different communities within Thurrock.
- 4.7 The 137 individuals are in scope for this proposal and the roles can be seen in the following tables, which have been split into the two directorates.
- 4.8 The following tables show the current roles that are in scope for this restructure.

**PLACE:**

Position	Headcount	FTE	Grade
Noise Nuisance Officer	1	1	E
Domestic Abuse Officer	2	2	E
Housing Safeguarding Manager	1	1	G
Anti-Social Behaviour Team Leader	1	1	F
Anti-Social Behaviour Service and Strategy Manager	1	1	H
Anti-Social Behaviour Officer	3	3	E

Principal Environmental Health Officer	2	2	F
Well Homes Advisor	1	1	E
Private Housing Liaison Officer	1	1	D
Well Homes Advisor	3	3	E
Environmental Health Officer - Ukraine	2	2	E
Customer Liaison Officer	1	1	D
Financial Inclusion Officer	1	1	E
Private Rented Property Licensing Officer	4	4	E
Private Rented Property Licensing Assistant	2	2	B
Concierge CCTV Manager	1	1	F
Concierge CCTV Operator	11	11	E
Housing Enforcement Manager	1	1	H
Concierge CCTV Team Leader	2	2	E
Traveller Liaison Manager	1	1	F
Traveller Liaison Officer	1	1	D

#### **CORPORATE SERVICES:**

<b>Position</b>	<b>Headcount</b>	<b>FTE</b>	<b>Grade</b>
VAWG Co-Ordinator	1	0.76	G
AD Counter Fraud, Community Safety and Resilience	1	1	SM1
Apprentice - Business Administration	1	1	APP
Partnership Manager	1	1	G
Emergency Planning Officer	1	1	E
Senior Emergency Planning Officer (COMAH)	1	0.44	F
Lead Officer - Emergency Planning and Response	1	1	G

Lead Officer - Business Continuity Programme	1	1	G
Enforcement Operations Manager	1	1	G
Head of Enforcement and Community Protection	1	1	I
Enforcement Supervisor	1	1	F
Environment Enforcement Officer	4	4	E
Civil Enforcement Officer	20	20	D
Civil Enforcement Supervisor	2	2	E
Senior Parking Officer	1	1	F
Representation and Appeals Officer	3	3	E
Head of Public Protection	1	1	I
Principal Officer - Food	1	1	H
Environmental Health Officer - Environmental Health Food Safety	4	3	F
Lead Environmental Health Officer	1	1	G
Lead Officer - Food	1	1	G
Environment Protection and Digital Evidence Manager	1	1	H
Technical Officer	4	2.5	D
Environmental Protection and Contaminated Land Officer	1	1	F
Air Quality Pollution Officer	1	1	G
Environmental Health Officer - Environmental Protection	6	5	F
Health and Safety Manager	1	1	H
Health And Safety Inspector	1	1	F
Health And Safety Advisor	1	1	F
Lead Officer - Health and Safety	1	1	G
Licensing Technical Support Officer	1	0.61	D

Licensing Officer	4	2.8	E
Technical Support Officer	2	1.22	D
Joint Licensing Manager	1	1	H
Apprentice - Business Administration	1	1	APP
Apprentice - Trading Standards	1	1	APP
Import Surveillance Officer	3	3	D
Senior Import Surveillance Officer	1	1	E
Trading Standards Manager	1	0.86	H
Trading Standards Officer	6	5.82	E
Lead Trading Standards Officer	1	1	G
Senior Trading Standards Officer	1	1	G
MTO CCTV Operative	2	2	C
MTO Appeals Officer	1	1	E
Support Officer	1	1	D
Business Improvement Officer	1	1	D

4.9 The corporate plan has clearly identified how the Council will need to change in order to regain trust and belief of its members and residents. The plan identifies our purpose as a Council within the following.

- lead our **communities, bringing residents, businesses, community groups and partners together** to better understand the opportunities and needs of the borough and individual neighbourhoods.
- **bring together and engage** all who can make a contribution to supporting local people with their needs and to realise opportunity.
- provide high quality analysis to support **open decision-making** on strategic and operational priorities.
- be consistent and comprehensive in **analysing and evaluating the impact** of our collective strategies at addressing need and opportunity to enable us to learn how to improve.

4.10 This restructure allows for the changes to these service areas that is required to answer some of the above changes. Within the corporate plan, objectives have been set to allow for the measurement of change and below it is explained how these objectives are also met through this restructure and new way of working.

i. **A council-wide approach to engagement and partnership working, ensure co-creation of services.**

This new service will provide clear and purposeful plans with tangible outcomes for enhanced performance. We will liaise with our communities and respond by creating specific strategies for areas of concern and have a continual cycle of feedback leading to improvement.

ii. **Implement our change programme ensuring that our operating model and structure delivers our functional responsibilities efficiently and we evaluate this to continue to improve.**

We will establish a project management structure to track progress, resolve issues, and ensure milestones are met. Engagement will be a key enabler, staff will be part of the process to develop the service. We will continuously gather feedback from stakeholders including residents, members and staff to ensure we foster a continuous improvement culture.

iii. **Implement our governance improvement programme, ensuring we renew and refocus our processes and procedures to be open and accountable.**

With greater member and resident engagement, delivering performance reports to Place O&S and attending Community Forums, we will see a far greater level of oversight and accountability of the service areas, however this level of accountability will not be seen as a 'hindrance', but opportunity.



iv. **Manage Thurrock Council's resources to ensure maximum value to the public and deliver efficiency and accountability.**

This re-structure will maximise the effectiveness of the resources that we currently have. The changes will add resilience to services that currently have low resourcing levels. As the service matures there will be natural changes made to strategies and resourcing, this dynamic way of working will promote value for money and ensure accountability in its outcomes.

4.11 The restructure of these service areas will have a direct impact on our residents' and will enable us to inform our own decision making based on the views of our residents, with greater engagement within our communities.

4.12 The teams within the new service area will also be better placed to deliver outcome-based strategies to deal with issues affecting specific communities, of which this proposal seeks to split the borough into 4 separate areas.



Aveley/Ockendon/Orsett



Stanford/Corringham/East Tilbury



Tilbury/Chadwell



Grays/West Thurrock/Purfleet

4.13 These areas have been created using current wards and localised understanding of the borough of Thurrock. These have been selected so current data sets can continue to be used and a complete 'overhaul' of data capture does not need to take place.

4.14 It has also been identified that these areas have similar resident complaints around ASB, crime and environmental protection issues.

4.15 This proposal does not simply 'move people' from one area of the Council to another, there is little reason for simply doing that, this proposal will look to change the working ethos of officers to collaborate and engage with their colleagues and residents to solve the community problem, which will require more than simply a shift of people.

- 4.16 The use of 'mobile' ICT platforms will promote agility and allow our staff to manage the services they provide as well as report, in 'real-time', incidents that they come across when travelling around our borough, removing the mindset of 'not my role'. With these platforms a greater customer experience will be gained as residents will be able to report issues quicker and more effectively as all service areas will have access to the same report, which does not happen now. This will enable us to provide a faster and more effective service to the residents, but also reduce the inefficiencies that are seen across this area of the Council. This system will also add data analysis and enable targeted resourcing so that the best value for money service is provided to the residents of Thurrock placing resources where they are needed, whilst ensuring detailed data allows for localised strategies.
- 4.17 This is currently being scoped through an ICT consultant and a further options paper will be made available towards the end of November highlighting where changes should be made and the solutions available to the Council.
- 4.18 Technology alone will not solve the issues faced by residents within our communities, so it will be the Community Safety teams that will look towards developing a community-based volunteer sector by encouraging neighbourhood watch programmes and supporting youth engagement programmes to enhance our community presence and bring together those that want to assist the Council in its aims of development and transparency.
- 4.19 The financial challenges facing the council require all services to examine different ways of delivering services. The new structure will incorporate a change to current duties within the service areas, however this will also allow for greater resilience and a streamlined managerial structure.
- 4.20 The new structure will have a few changes to roles, including management structures. The significant changes are seen at grades G and H, however all roles within the new service area will change with the new working practices at the heart of these changes.
- 4.21 The full structure charts can be seen at the back of this report; however, the Community Protection & Enforcement team is split into two different operational sides; Community Protection & Regulation and Community

Protection, Resilience & Enforcement, with a head of service leading each operational side and an Assistant Director for Community Protection & Enforcement having oversight of the entire service area.

- 4.22 The restructure of these teams enables better use of resources and enables a greater level of control and oversight of 'the bigger picture' in terms of our communities and the issues they face.
- 4.23 There is also an ICT platform review taking place that will enable the Council to move into the future and allow for collaborative working, which our current systems inhibit.
- 4.24 These changes, whilst developing a more robust, engaging and resilient service area will also deliver financial savings.
- 4.25 The current financial obligations based on the current structure can be seen in the graphic below, however the overall obligation to the current structure is **£7,889,528**. This current obligation is not sustainable and a reduction of this is required.
- 4.26 The proposal will see the general fund obligation reduce by £463,641, however there will be additional enforcement and management duties that will be conducted through the new structure, therefore the new roles that have been created also include increased recharging to the HRA for this additional work and management of £149,619.
- 4.27 All of the financial data can be seen in the below table.

As is Structure Cost			To be Structure Cost			Movement (As is - To be)		
Funding stream	FTE	Total Cost	Funding Stream	FTE	Total Cost £	Funding Stream	FTE	Total £
HRA	24.6	£1,552,360	HRA	26.6	£1,701,980	HRA	2.0	<b>£149,619</b>
General Fund	41.6	£2,848,891	General Fund	35.8	£2,385,250	General Fund	-5.8	<b>-£463,641</b>
Grant Funded	12.0	£597,709	Grant Funded	12.0	£597,709	Grant Funded/External		
Externally Funded	16.0	£770,436	Externally Funded	16.0	£770,436	funded/part external	-0.8	<b>£0</b>
Part External Funded	36.2	£2,120,131	Part External Funded	35.4	£2,120,131	funded		
<b>Grand Total</b>	<b>130.4</b>	<b>£7,889,528</b>	<b>Grand Total</b>	<b>125.9</b>	<b>£7,575,506</b>	<b>Total</b>	<b>-4.6</b>	<b>-£314,022</b>

- 4.28 The total financial obligation if this proposal is proceeded within its current form will be **£7,575,506**.

4.29 The restructure has put 10 FTE positions 'at risk', although these will be offset by the creation of 6 new roles.

**AT RISK:**

Job Title	Band
VAWG Co-Ordinator	F
Partnership Manager	G
Lead Officer - Emergency Planning and Response	G
Lead Officer - Business Continuity Programme	G
Enforcement Operations Manager	G
Head of Enforcement and Community Protection	I
Enforcement Supervisor	F
Housing Safeguarding Manager	G
Anti-Social Behaviour Team Leader	F
Anti-Social Behaviour Service and Strategy Manager	H

**NEW ROLES:**

Job Title	Band
Senior Community Protection, ASB & Enforcement Manager	H
Community Safety, Safeguarding & Enforcement Manager	G
ASB & Enforcement Team Leader	F
Housing Safeguarding, Domestic Violence & VAWG Team Leader	F

Emergency Planning & Resilience Manager	G
Head of Community Protection, Resilience & Enforcement	I

- 4.30 As job evaluations have not been finalised, there may be some slight movement in this figure when assigning HRA/General fund salary costs, however these are not anticipated to be significant as the ‘functions’ of the services are not diminishing, rather simply realigning.
- 4.31 The project plan for this shows that the restructure of the roles will take place in April 2025, however the new working model being taken forward will take longer to implement than the movement of people.
- 4.32 Community engagement will be phase two of this process and this will help develop the strategies for the separate communities, which is anticipated to be completed within 9-12 months.
- 4.33 The ICT platform to truly integrate the teams is anticipated to be completed in approximately 12-18 months, after a procurement process is completed and the systems rolled out across the service area.
- 4.34 Lastly, the only team that is not remaining within Corporate Services or Place, is the Counter Fraud & Investigation team which currently sits within Corporate Services. This has been agreed to move to Finance and will fall under the remit of the Section 151 officer.

## 5. Alternative options considered

- 5.1 A variety of revisions of this structure have taken place and this is currently out to staff and union consultation. The alternative to ‘stay as we are’ is not viable and would not allow for the streamlining of management structures that can be seen within this report.

## 6. Consultation

- 6.1 This restructure is the subject to a formal 45-day consultation period, with the timeline of this activity shown below.

Activity	Dates
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Group consultation briefing and start of 45-day consultation	6 <sup>th</sup> December 2024
Employee one-to-one sessions begin	10 <sup>th</sup> December 2024
Trade Union Meeting to agree selection process and share progress and feedback	w/c 16 <sup>th</sup> December 2024
Deadline for initial comments on proposals from employees and Trade Unions	6 <sup>th</sup> January 2025
Management to consider all submissions and incorporate them where appropriate into a revised business case	8 <sup>th</sup> January 2025
Revised business case and structure to be circulated (if appropriate)	8 <sup>th</sup> January 2025
Review feedback against revised proposals and amend as appropriate	10 <sup>th</sup> January 2025
Provide report on outcome to consultation to appropriate Panels, SLT and Trade Unions	13 <sup>th</sup> January 2025
Ring-fenced interviews, assimilation and redundancy selection process to be carried out by management and HR	14 <sup>th</sup> January – 17 <sup>th</sup> January 2025
Formal Consultation ends	20 <sup>th</sup> January 2025
Formal redundancy notice meeting with selected staff – notice letters to be issued	21 <sup>st</sup> January 2025
Implementation of structure	1 <sup>st</sup> April 2025
<i>Ongoing support and search for redeployment opportunities to staff under notice of compulsory redundancy</i>	<i>From 21<sup>st</sup> January 2025 until end of notice periods (up to 3 months)</i>

6.2 The PFH, Victoria Holloway has also been consulted on this restructure.

## 7. Financial Implications

7.1 The total cost of the proposed structure is £7.576m against a current structure cost of £7.890m, resulting in a yearly net reduction of £0.314m, a reduction of

£0.463m to the general fund and an increase of £0.150m to the HRA for recharges of applicable salary costs.

- 7.2 As part of the proposals, there will be a further 2 posts part-funded by the HRA totalling £0.150m. This use of HRA funding will be to discharge HRA functions covered by the new borough-wide community protection and enforcement service for additional work that will be undertaken. Current work on the HRA and general fund recharges is being undertaken to rebase budgets and will include the funding proposed by this restructure.
- 7.3 There are potential one-off costs for redundancy of £0.510m, but these are subject to the outcome of recruitment and selection processes.
- 7.4 Monitoring of the delivery of the financial savings associated with this proposal will be completed through monthly budget meetings and ongoing governance.

**Implications Verified by: Sima Khuroya, Assistant Director Financial Management & Procurement, 7<sup>th</sup> January 2025**

## **8. Legal and Governance Implications**

- 8.1 While there are various statutory provisions governing the Council's enforcement powers this proposal recommends a structure that is designed to transform how enforcement services are delivered, and the Council has the power to do so pursuant to the general power of competence contained in section 1 Localism Act 2011.
- 8.2 The restructure must be carried out in accordance with the Council's established employment procedures. The key policy containing the relevant detail on the restructure process, is the "Change Management policy". In line with this, meaningful consultation should be carried out and responses from staff along with recognised unions should be considered when establishing the final structure. Particular attention should be given to the impact on staff with disabilities and those who are pregnant, on maternity, adoption or shared parental leave. In respect of any further recruitment, this should be supported by HR colleagues to mitigate the risk of any potential litigation.

8.3 It should be noted that staff on fixed term contracts with two years service, will have qualifying service for a claim of unfair dismissal and therefore termination of employment where required, should follow a fair process.

8.4 None of the roles at risk are above a Grade I banding, and as such the provisions of Chapter 10 of the Constitution which sets out the Employment Procedure Rules for the Head of Paid Service and Chief Officers/ Directors, are not relevant here.

8.5 **Implications Verified by: Helen Nicol, Assistant Director Legal & Governance, 19 December 2024**

**9. Equality and Diversity Implications (including the public sector equality duty)**

9.1 This report highlights the restructure of the service areas of community protection and enforcement and how the Council will work with communities and partners to deliver a more engaging and collaborative approach to community protection and enforcement.

9.2 A Community Equality Impact Assessment has been completed to understand the impact on staff with protected characteristics so that any adverse impacts can be understood, and potential mitigation considered, as part of the restructure process.

9.3 **Implications Verified by: Natalie Smith, Head of Community Development**

RISK DESCRIPTION & CONSEQUENCE	MITIGATIONS	RESIDUAL RISK STATUS
<b>Consultation delayed and subsequent savings reduced</b>	Consultation has timelines attached to report. Monitored through weekly meetings with project staff and responsible ED.	Low
High Redundancy Costs due to restructure.	Policies are in place that will be followed and reduce risk of complaints/grievances. Legislation protects redundancy.	High
Community engagement is not as expected and reduces effectiveness of	Plan with communities' engagement teams to maximise reach, understand barriers faced by	Amber



redesigned services and impact on residents lives minimal.	others who have implemented this type of service. Utilise Councillors to maximise interest in services.	
ICT single platform not introduced which will limit the level of simple collaboration that is discussed within the paper.	Extensive work has been carried out and paper written for SLT to consider. Services would still be able to deliver on current systems as they always have.	Low

## 10. Risk Management Implications

### Risk Implications verified by:

- 10.1 A Community Equality Impact Assessment has been completed to understand the impact on staff with protected characteristics so that any adverse impacts can be understood, and potential mitigation considered, as part of the restructure process.
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## 11. Other Implications

- 11.1 This policy assists in the Council in its obligations under the Crime and Disorder Act. It will assist in the enforcement of activities that are appropriate for the Local Authority to take.

## **Relevance Check**

### **Budget Reduction/Service Area:**



This restructure forms part of the savings for 2025/26 and will contribute to a general fund saving of £500,000 as explained in this paper.

**Date: 05/12/2024**

In what ways does this Budget reduction have an impact on an outward facing service? How will the service feel different to your customers or potential customers?

This brings together 13 service areas from across 2 directorates thus improving community focused strategies that bring collaboration to the fore in terms and the ability to deliver solution-based outcomes for our communities in terms of community protection and enforcement.

There will be a reduction in staffing numbers, however these, bar one, are all roles that are within the management structures and are the result of combining the service areas, this will not reduce the services provided to residents and the wider community.

If not, how does it impact on staff e.g. redundancies, pay grades, working conditions? Why are you confident that these staff changes will not affect the service that you provide?

N/A

Is a Customer Impact Assessment needed? No

