

Appendix 1: Joint Trading Standards Service Options Appraisal – Potential benefits, issues, costs and savings

LEGAL Options appraisal – Potential benefits, issues, costs and savings	
Joint Trading Standards Service with Suffolk County Council as host authority	Joint Trading Standards Service with Norfolk County Council as host authority
<p>Suffolk legal budget: £179K plus £30K provided by Suffolk Legal = £209K</p> <p>Benefit: Legal services provision by officers and in house solicitor (0.6FTE), supplemented by Suffolk Legal Services (principal solicitor, litigation solicitor with higher rights (civil courts) and commercial solicitors).</p> <p>Benefit: Principal advisor has significant experience and expertise in criminal litigation, advising on regulatory/ standard criminal practice/ POCA/RIPA/Enterprise Act matters/ judicial review aspects of investigations and prosecutions.</p> <p>Benefit: Advocacy provided in house (by managers), by Suffolk Legal and regulatory specialist counsel in the higher courts. Suffolk Legal looking to build on strength/capacity and reduce costs of external spend by supporting all lawyers in SL Enforcement team to acquire higher rights of audience.</p> <p>Issue: Concerns as to the capacity of Suffolk Legal provision to support larger, joint service, particularly where long-running, large scale investigations (especially complex fraud) resulting in not-guilty pleas/crown court trials could rapidly diminish the joint legal budget.</p> <p>Saving: Whilst additional staffing may be required, use of a single provider across the joint service is likely to realise savings overall with pooled expertise and systems (CPD, knowledge and access to reference materials)</p> <p>Saving: Larger, joint service may enable reduced costs when engaging counsel.</p>	<p>Norfolk legal budget:</p> <ul style="list-style-type: none"> • ‘In house’ legal salaries - £112K • Other legal costs e.g. witness expenditure, counsel fees- £84K • Nplaw costs - £3K • Forensic testing, expert reports, translation costs - £18K <p>Total - £217K</p> <p>Benefit: In house legal team, with an embedded Principal Case Officer post (legally qualified), providing added value to investigations from the outset and handling simple/administrative and guilty plea hearings.</p> <p>Benefit: Resilience in legal process/representation due to shared authority amongst officers/managers to appear in magistrates and county courts.</p> <p>Benefit: Lead TSO with Enterprise/injunctive specialism based in the legal team. This post handles civil legal process as far as possible (including drafting orders) reducing the need to employ solicitors.</p> <p>Benefit: Corporate legal service (Nplaw) support with access to Nplaw advice/expertise and resource materials. As well as handling some of Norfolk TS legal function work, Nplaw is putting in place a new Advocacy service, aiming to support a range of clients, including Trading Standards, with a view to reducing costs.</p> <p>Issue: Concerns as to the capacity of in house legal provision supplemented by Nplaw to support larger, joint service, particularly where long-running, large scale investigations (especially complex fraud) resulting in not-guilty pleas/crown court trials could rapidly diminish the joint legal budget.</p>

	<p>Saving: Whilst additional staffing may be required, use of a single provider across the joint service is likely to realise savings overall with pooled expertise and systems (CPD, knowledge and access to reference materials)</p> <p>Saving: Larger, joint service may enable reduced costs when engaging counsel.</p>
<p>Benefit: Accredited Financial Investigator (AFI) to manage and deal with all aspects of financial investigation/POCA work (1.0FTE) with a TSO currently midway through the accreditation process with a view to carrying out financial investigations on a part time basis</p> <p>Benefit: Pooled resource to increase capacity and resilience.</p>	<p>Benefit: Accredited Financial Investigator (AFI) as part of the legal team to manage and deal with all aspects of financial investigation/POCA work (1.0FTE). Being part of the legal team provides synergy with court work (production orders etc.) whilst also working closely on investigations work. The AFI also handles wider legal case work/hearings as required.</p> <p>Benefit: Pooled resource to increase capacity and resilience.</p>
<p>Benefit: Intelligence Officer (0.8FTE), who provides the intelligence function for the Service, and is authorised to undertake PNC checks for defendants & witnesses.</p> <p>Benefit: Pooled resource to increase capacity and resilience.</p>	<p>Benefit: Intelligence Analyst (1.0FTE) and Technical Support Officer (Intel) (1.0FTE), who collate and analyse all intelligence into the Service. Both officers work alongside the Norfolk Legal team, providing key support in areas such as PNC checks for defendants & witnesses and correct company details for legal papers.</p> <p>Benefit: Pooled resource to increase capacity and resilience.</p>
Differential: Suffolk cover petroleum licensing, explosives storage, safety of sports grounds	
<p>Implementation costs (regardless of host):</p> <ul style="list-style-type: none"> • Interauthority agreement – drafting, agreement and approval • Constitutional amendments – delegation of statutory powers and duties – drafting, agreement and approval • Review of impact on Suffolk TS and Environmental Health cross authorisation • Review of impact on Norfolk TS section 101 agreements (for calibration services to other local authorities) • Equality impact assessment – drafting, agreement and actions arising • Joint governance committee – development, approval and ongoing support • TUPE transfer – drafting, agreement, approval, consultation and implementation 	

HUMAN RESOURCES Options appraisal – Potential benefits, issues, costs and savings	
Joint Trading Standards Service with Suffolk County Council as host authority	Joint Trading Standards Service with Norfolk County Council as host authority
<p>Headcount in Suffolk is 40 (35.35FTE), including business, finance, ICT, HR and operational support staff</p> <p>Officers who are delivering TS functions and whose roles would need to be “equalised” Management team = 5 Officers = 22 Total = 27 (43%)</p> <p>Relative Issue: 36 (57% of total) TS qualified staff from Norfolk would need to be integrated into Suffolk staffing structure</p> <p>Saving: Could Suffolk support staff provide support for the joint service as a whole?</p>	<p>Headcount in Norfolk is 48 (46.00FTE) plus shared services support for business support, finance, ICT and HR</p> <p>Officers who are delivering TS functions and whose roles would need to be “equalised” Management team = 5 Officers = 31 Total = 36 (57%)</p> <p>Relative Benefit: 22 (43% of total) TS qualified staff from Suffolk would need to be integrated into Norfolk staffing structure</p> <p>Saving: Could Norfolk shared services support staff provide support for the joint service as a whole?</p>
	<p>Issue: Suffolk currently hosts three national Trading Standards teams (16.75FTE) (Imports, Single Point of Contact for Ports and the Intelligence Hub). The liabilities relating to these teams would transfer to Norfolk.</p> <p>Issue: Suffolk currently provides ICT support for the EETSA Regional Coordinator and Regional Intelligence Analyst and plan to do so for the Regional Intelligence Support Officer.</p>
<p>Differential: No incremental progression on salaries (to be reviewed in 2018).</p> <p>Saving: Reduced salaries costs if those Norfolk staff who are not on the top of their salary scale are enabled to adopt Suffolk terms and conditions post TUPE transfer</p>	<p>Differential: Subject to performance appraisal outcome, incremental progression on salaries.</p> <p>Cost: Increased salaries costs if Suffolk staff are enabled to adopt Norfolk terms and conditions post TUPE transfer</p>
Differential: Pay day on last working day of the month	Differential: Pay day on 19 th of the month
Differential: Annual leave entitlement - 25 days (with 5 years' service) and 28 days (with 10 years' service)	Differential: Annual leave entitlement - 29 days (with 5 years' service) (30 days for those above scp 29 with 10 years' service)

Differential: Leave buy back arrangements – up to 8 weeks leave per year with service agreement	Differential: Leave buy back arrangements – up to 10 days leave per year with service agreement
Differential: Flex leave – up to 15 days per annum	Differential: Flex leave – up to 18 days per annum
Differential: Overtime rates - 1 1/3 Saturdays and 1 2/3 Sundays and bank holidays (payable up to scp 28)	Differential: Overtime rates - 1 ½ Saturdays and 2 Sundays and bank holidays (payable up to scp 37)
Benefit: Out of hours standby cover is provided at a cost of £22K per annum and could be rolled out to cover the joint service as a whole at no extra cost	Issue: No formal out of hours standby cover is provided (due to risk assessment determining it to be an unnecessary cost to the Service). Out of hours contact is provided by NFRS Control. Saving of £22K per annum if Norfolk approach adopted by joint service
Differential: Work mobile 'phones – reasonable personal usage permitted	Differential: Work mobile 'phones – no personal usage permitted
Differential: Redundancy costs – 50% on top of statutory payment	
Relative issue: Default is for two officers (one being a support officer, if available) to attend farm premises, private homes and other premises deemed to require dual attendance (policy under review) Cost: Drop in operational efficiency if policy adopted by joint service. In addition there are no operational support staff currently employed in Norfolk	Relative benefit: Default is for one officer to attend unless risk assessment deems dual attendance is required Saving: Increase in operational efficiency if policy adopted by joint service

FINANCE Options appraisal – Potential benefits, issues, costs and savings	
Joint Trading Standards Service with Suffolk County Council as host authority	Joint Trading Standards Service with Norfolk County Council as host authority
Net 2016/17 budget = £1,843.4K (excluding Citizens Advice Bureau funding)	Net 2016/17 budget = £1,871.5K
Differential: Suffolk budget (£1,477.4K) includes full cost of salaries including on costs. Cost: Additional salaries budget of circa 4.5% (£88.4K per annum) would need to transfer to joint service budget from Norfolk corporate centre	Differential: Norfolk budget (£1,877.4K) includes 95.5% of cost of salaries including on costs at top of scale.
Differential: Salaries budget includes support costs (covering business administration, operational support and finance) of £218.7K. There is a budget of £4K for PACT tape transcription Cost: Norfolk expenditure on administration, finance, HR support, ICT, stationary/postage, training, rent and other overheads (£429.6K) would need to transfer to joint service budget from Norfolk corporate centre	Cost: Suffolk expenditure on public & employer's liability insurance, ICT, stationery/postage, rent and other overheads (£485.8K) would need to transfer to joint service budget from Suffolk corporate centre
Differential: Pension employer contribution rate (including past deficit contributions) = 27% Cost: Additional costs of £186.8K per annum for Norfolk staff to transfer to Suffolk pension scheme (or £56.8K per annum if the proportion of the lump sum were to be disaggregated from the corporate centre)	Differential: Pension employer contribution rate = 15.5% with the past deficit contributions paid as an annual lump sum by the corporate centre. Equates to 23.5% if calculated as per Suffolk Saving: Reduced costs of approximately £120K per annum for Suffolk staff to transfer to Norfolk pension scheme. (Further savings would be realised by National Trading Standards (NTS) if the national Trading Standards teams also transferred)

<p>Saving: Reduction in service professional and information resource annual subscriptions (currently £31.6K for Suffolk and £31.2K for Norfolk) regardless of host option</p> <p>Differential: Suffolk currently pays CTSI membership for officers at a cost of £3.2K per annum</p> <p>Cost: Additional budget of £4.2K required if this practice is adopted across the joint service</p>	<p>Saving: Reduction in service professional and information resource annual subscriptions (currently £31.6K for Suffolk and £31.2K for Norfolk) regardless of host option</p> <p>Differential: Norfolk currently only pays CTSI membership for students so as to realise TSQF cost reductions.</p> <p>Saving: Reduced budget of £3.2K if this practice is adopted across the joint service</p>
<p>Cost: Suffolk procure and manage an in house pool car fleet of 8 vehicles (including a van). If the same system is adopted across the joint service additional vehicles will need to be procured/located at Norfolk offices</p>	<p>Issue: Norfolk procure and manage one van and utilise corporate pool and hire car provision. Would need to explore if this arrangement could extend into Suffolk</p>
<p>Differential: Food/feed sampling budget = £32.35K</p>	<p>Differential: Food/feed sampling budget = £88K</p>
<p>Differential: "Investigations" budget (such as surveyor fees, product safety testing, land registry, animal welfare veterinary fees and translation costs) = £26.5K</p>	<p>Differential: "Investigations" budget (such as surveyor fees, product safety testing, land registry, animal welfare veterinary fees and translation costs) = £51.5K</p>
<p>Differential: Training budget = £40K</p>	<p>Differential: Training budget = £24K (paid corporately)</p>
<p>Differential: Offsite archive budget = £4.5K</p>	
<p>Differential: Historic pension strain payments = £10k per annum</p>	<p>Differential: Historic pension strain payments = £26K per annum</p>
<p>Income budgets:</p> <ul style="list-style-type: none"> • Verifications = £3K • Fireworks importation dissemination of information = £24K • Registrations and licence fees for petroleum, explosives and performing animals = £32K • Checkatrade = £6K • Miscellaneous income £28K • Recovery of prosecution costs = 15.5K <p>Total = £108.5K</p>	<p>Income budgets:</p> <ul style="list-style-type: none"> • CVTS income = £339.5K • Registrations and licence fees for performing animals = £0.5K • Trusted Trader = £36K • ICT recharge for database = £11.4K • Primary Authority/Business advice (required) = £20.2K • POCA expectation = £31.3K • Recovery of prosecution costs = £15K <p>Total = £453.9K</p>
<p>Reserves = £338K</p>	<p>Reserves = £92.6K</p>

OPERATIONS Options appraisal – Potential benefits, issues, costs and savings	
Joint Trading Standards Service with Suffolk County Council as host authority	Joint Trading Standards Service with Norfolk County Council as host authority
Lean systems thinking approach, with three multi-functional teams focusing on reactive work arising from referrals	Intelligence-led enforcement with three functional specific teams focusing on intelligence driven work, including market surveillance
<p>Issue: Norfolk proposing to introduce chargeable business advice, which is not supported by Suffolk beyond the introduction of Primary Authority Partnerships</p> <p>Cost: Loss of potential income from chargeable business advice</p> <p>Benefit: Norfolk TS developing expertise of Primary Authority Partnerships with potential to offer this service to Suffolk-based businesses</p>	
<p>Proposal to maintain current managerial capacity with restructure of managerial team leading to a Head of Service, two Assistant Heads of Service (one based in each authority), seven section managers and a CVTS team manager</p> <p>Cost: Circa £45K per annum</p>	<p>Proposal to streamline management structure with a Head of Service, one Assistant Head of Service (based in the other authority to the Head of Service), seven section managers and a CVTS team manager.</p>
Benefit: Market Fair (Norfolk) and Lorry watch (Suffolk) schemes could be rolled out across both counties regardless of host authority	
<p>Issue: Two trader assurance schemes in operation:</p> <ul style="list-style-type: none"> • Checkatrade in Suffolk with an income of £6K • Trusted Trader in Norfolk with an income of £36K offset by costs of administering the scheme in house. <p>It would not be desirable for the joint service to run two schemes:</p> <ul style="list-style-type: none"> • Checkatrade membership rates would preclude membership by a number of Norfolk Traders • Trusted Trader is the vehicle through which Adults can provide recommendations of vetted traders to support vulnerable people 	

ICT Options appraisal – Potential benefits, issues, costs and savings	
Joint Trading Standards Service with Suffolk County Council as host authority	Joint Trading Standards Service with Norfolk County Council as host authority
Cost: Full integration of 48 staff based at 3 Norfolk offices = <ul style="list-style-type: none"> • Capital = £125K • Operating cost = £33.4K per annum 	Cost: Integration of 40 Suffolk TS staff and 20 national and regional team staff = £109.3K per annum
Differential: New database recently commissioned with anticipated annual costs of £20K	Differential: Current database annual costs of £18.4K
Issue: Norfolk database is shared with Great Yarmouth Environmental Health and Adults Quality Assurance team with further teams due to join. Transfer of TS to the Suffolk database: <ul style="list-style-type: none"> • presents a risk to partners as TS is the contracting partner • would lead to loss of intelligence sharing, and • would not realise the full cost saving of £18.4K if partners continue to use the database in Norfolk 	
	Issue: Suffolk expressed concern over Norfolk ICT's capacity and capability to implement and manage a joint ICT solution for the joint service
Implementation costs (regardless of host): <ul style="list-style-type: none"> • Data security, ownership and responsibilities – drafting, agreement and approval • Additional storage capacity, if required • Hosting of non-host-standard applications, if required • File storage, individual and shared drives management – drafting of protocols, agreement and approval • Data resilience and business continuity requirements • New email addresses for standard and secure accounts, access to old emails • Access security – drafting, agreement, approval and implementation of policies • SLA with ICT support – drafting, agreement and approval • PCI/DSS compliance (the storage of credit card numbers) • Maintenance of internet/intranet presence on both Norfolk and Suffolk platforms 	

Benefits (regardless of host):

- Reduced costs through sharing infrastructure
- Joint database/platform for recording/reporting all joint service activities
- Improved data and intelligence sharing

GOVERNANCE Options appraisal – Potential benefits, issues, costs and savings

Joint Trading Standards Service with Suffolk County Council as host authority

Joint Trading Standards Service with Norfolk County Council as host authority

Suffolk & Norfolk Joint Service - Proposed Service Priorities:

- Protecting vulnerable people by engaging the public, businesses and communities to build resilience to scams, doorstep crime and rogue traders.
- Enabling business growth and prosperity by providing support on legal compliance and assuring the level playing field by tackling the most serious illegal trading.
- Conducting intelligence led market surveillance to protect the safety, health and well-being of the public and ensure trading is legal, honest and fair.

Suffolk & Norfolk Joint Service – Proposed Governance Arrangements: Joint committee with equal political representation from Norfolk and Suffolk County Councils

COMMUNICATIONS Options appraisal – Potential benefits, issues, costs and savings

Joint Trading Standards Service with Suffolk County Council as host authority

Joint Trading Standards Service with Norfolk County Council as host authority

Current access to press desk with three press officers and an account manager who acts as SPOC (structure under review)

Cost: Expectation of resource contribution from Norfolk

Cost: resource costs to restructure and realign processes to support joint service

Access to recently restructured media management team giving full media support

Cost: Expectation of resource contribution from Suffolk

Cost: resource costs to restructure and realign processes to support joint service

Current access to media management, social media support and website team	Access to media management and website team
Benefit: Suffolk TS and media team have good experience of delivering good press and media campaigns, including promotion of brand-led campaigns	Benefit: Norfolk TS and media team have good experience of delivering good press and media campaigns
Benefit: Suffolk TS has resources to maintain good TS social media presence	Benefit: Norfolk TS has resources to maintain good TS social media presence
<p>Benefits (regardless of host)</p> <ul style="list-style-type: none"> • One campaign design across both counties avoids duplication • Potential for “one message” across both counties avoids duplication <p>Issues (regardless of host):</p> <ul style="list-style-type: none"> • Concern as to whether small media team in either county would have the capacity to handle all media for the joint service • Potential loss of accessibility and good working relationships with specific contacts at media points in non-host county • Potential loss of understanding around local demographic issues in non-host county • Concern as to loss of control of media messages in non-host county 	