



2nd June 2006

Mr Ian Maye
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Dear Ian

**THE REVIEW OF PUBLIC ADMINISTRATION IN NORTHERN IRELAND
- DELIVERING EFFECTIVE ENVIRONMENTAL HEALTH SERVICES**

Following discussions at our meeting of 26th May I now provide an updated paper on behalf of the Chief Environmental Health Officers Group in Northern Ireland (CEHOG), that adds clarity to our submission dated 3rd May 2006.

The recommendations in this paper can be tailored to provide a satisfactory solution to the need for effective liaison mechanisms across all councils, and for the councils' essential contacts with government departments, agencies and other bodies.

CEHOG would be pleased to discuss these matters further.

Yours sincerely

BGS HEYWOOD

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**THE REVIEW OF PUBLIC ADMINISTRATION IN
NORTHERN IRELAND**

**- DELIVERING EFFECTIVE ENVIRONMENTAL HEALTH
SERVICES**

**SUBMISSION ON BEHALF OF THE NORTHERN IRELAND CHIEF
ENVIRONMENTAL HEALTH OFFICERS GROUP**

June 2006

THE REVIEW OF PUBLIC ADMINISTRATION IN NORTHERN IRELAND - DELIVERING EFFECTIVE ENVIRONMENTAL HEALTH SERVICES

SUMMARY

Proposals for new local government structures in Northern Ireland have addressed three of the four key recommendations made by the Chief Environmental Health Officers Group to the RPA Review Team. The fourth recommendation, that a small team of environmental health practitioners should be established to provide an interface across local government, to advise and assist in the development of policy and strategy, to cut-across departmental boundaries and provide support and liaison between central and local government, has not yet been addressed.

Whilst the creation of seven councils in place of twenty six, provides advantages of scale for the future management of the local government environmental health service, liaison groups to ensure common approaches across the councils will be as necessary in Northern Ireland as they are in other parts of the UK wherever national or regional accord and consistency is desirable. Voluntary liaison arrangements across councils in England and Wales tend to suffer from the weakness that participants have a primary responsibility to their own council and only limited resources to devote to liaison tasks. The likely creation of council directorates that are cross-cutting in nature and served by staff drawn from a number of professional backgrounds may be beneficial for internal themed management but may exacerbate difficulties in communication and inter-council working.

The team of environmental health practitioners proposed for Northern Ireland would provide a focus for communication and policy development across councils, with government departments and with external agencies on regional issues such as: emergency planning; the environmental and health aspects of community planning; public health policy implementation; pollution and contaminated land. The team would aid the development and dissemination of means by which the environmental health service within the councils might be assisted to maintain the standards of service to business and the public expected by society and formalised within agreements. A further benefit would be the development of common policies and protocols across Councils where this is appropriate and would contribute to efficient, effective and consistent working practice.

It is recommended that the team should consist of a senior officer, (to provide the links with chief executives, directors and service heads etc), a number of experienced officers with specialist skills in the core-functions of environmental health, (food safety, health & safety, pollution control, consumer protection, housing and public health,) together with additional members having expertise in emergency planning and in aspects of community or public health planning.

This team would cost a small fraction of the cost of the present four Group Environmental Health Services (which would cease to exist under the new administration) but would enable part of the useful role of those groups to be carried forward into the new administration. It could be located within DHSSPS-NI, within an augmented DOE Local Government Division, or within a local government shared services organisation where it could be joined by other teams providing a similar function for other services such as Building Control, Planning, Fire Service etc.

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1. INTRODUCTION

1.1 The Northern Ireland Chief Environmental Health Officers Group (CEHOG) has submitted three responses to consultation documents relating to the Review of Public Administration (RPA). The first response dated 12 February 2004 set out the broad principles considered desirable for the future delivery of effective environmental health services for the population of Northern Ireland:

- a. The establishment of larger, multi-functional, local government organisations that would maximise collaboration between professional groups whilst ensuring democratic accountability and community involvement. This would also enhance efficient and effective sub-regional delivery of services and provide some economies of scale.
- b. Local accountability and local service delivery to be maintained by the establishment of Community Councils, served by elected members from the large councils, with some local arrangements for delivery of relevant environmental health and other services from decentralised offices of the main councils.
- c. Separation of policy direction and overview of public sector service provision, (at government department level) from service delivery, (a local government function), bringing back into local government some functions currently performed directly by DOE, HSENI, DETI TSS, DARD, DHSSPS, NIHE and Planning Service.
- d. Provision of a grouping of environmental health practitioners within central government to advise and assist in the development of policy and strategy, to cut-across departmental boundaries and provide support and liaison between central and local government.

These general principles have been endorsed in our subsequent responses.

2. DISCUSSION

2.1 It appears that the recommendations in sub-paragraphs 1.1.a. to 1.1.c. above, will be carried into effect by proposals already announced by the Minister. The recommendation at 1.1.d. does not appear to have been addressed and is believed to be a matter that should receive consideration for the following reasons:

- a. **Organisational factors.**
 - Evidence following recent reviews of local government in Wales and in England indicates a trend in local government services towards the provision of cross-cutting departments that include staff from a number of professional groups sharing common objectives.
 - At the same time, a progressive combination of functions within a smaller number of directorates or departments is becoming the norm within local government and must

be expected to occur within the new local government regime within Northern Ireland upon the Review of Public Administration.

- Although the reduction in numbers of councils will provide advantages of scale for the local management of environmental health services, ensuring delivery of effective environmental health services with a regionally consistent focus will require developed arrangements for cooperation and coordination between councils within Northern Ireland; between councils and Central Government departments and agencies; and also between local government in Northern Ireland and its counterparts in Scotland, England and Wales.
- There is also a need in Northern Ireland to liaise with professional colleagues in ROI to ensure that policies affecting health in our communities are meshed.

b. Response to National and Regional Policies and Strategies

- The Public Health Review in Northern Ireland made recommendations for the strengthening of environmental health input into policy development at Departmental level; the provision of a regional focus for health protection and health improvement that included an Environmental Health presence; and for more effective links to district councils.
- Recent UK publications include the HPA's "Health Protection in the 21st Century" (the Burden of Disease Study); the Environment Agency's document, "Better Environment – Healthier People"; the Health Development Agency document "Environmental Health – 2012, A Key Partner in Delivering the Public Health Agenda". These documents, together with Scotland's announcement of a Strategic Framework for Environment and Health and work in England to establish environmental health priorities, add to the evidence of a greater importance being placed upon strategic planning and the consequent need for organisational structures that may best accommodate the measures necessary to co-ordinate regional interaction.
- Local Government and related agencies are emphasising the need for realistic performance indicators across the local government sector and for effective use to be made of the information that they will provide.
- Within Northern Ireland, the Investing for Health Strategy, published in 2002, drew attention to the need for effective partnership working across a range of statutory and voluntary organisations to tackle the underlying factors of deprivation and disadvantage that lead to poor health in our communities. The targets of this strategy are still to be achieved, but it is clear that the planned role of local government in coordinating the development of community plans should be a significant facilitating factor in the delivery of these targets. Other strategies addressing health and environmental improvement will similarly benefit from larger council structures. However, regional co-ordination and liaison across organisations will not occur without effective planning.

Consideration of Coordination and Liaison Arrangements

2.2 The need for liaison and coordination is recognised by environmental health departments in councils across the UK. The aims of such interaction may be to avoid confusion and duplication of work:

- where one policy developed will suit a number of councils;

- where one shared procedure will drive common, consistent, high quality services avoiding complaints of local inconsistency;
- where one representative speaking with Government departments gains in effectiveness due to knowledge and experience and aids communication on behalf of many.

2.3 In Northern Ireland the existing Group Environmental Health Services perform and facilitate a role to aid consistency and quality of service but are not expected to continue in being after the Review of Public Administration. Prior to the formation of the Environment and Heritage Service in 1996, the Department of Environment (DOE) retained a dedicated environmental health policy unit consisting of 5 professional staff and administrative support which also contributed to this end. This resource was subsequently dispersed across departments.

2.4 Across councils in England, Wales and Northern Ireland, liaison and linkage across the environmental health profession has been commonly instituted for each of the main core functions and for key service areas. Typical examples would be regional and national groups formed to address issues of relevance to health & safety practitioners, for food safety or for pollution staff. Arrangements across councils in England and Wales are based upon voluntary groupings of officers drawn from shared specialist functions who find time from their primary duties to devote to those common tasks that will assist efficient service delivery, consistency and shared good practice across councils within a region or area. Progress is very much dependant upon an individual's enthusiasm, perseverance and availability, and the task necessarily receives a lesser priority than front line tasks for their immediate employer - leading, in practice, to inefficiency and time delays. A better mechanism for liaison, support and communication between councils, and between local and central government and other agencies and bodies would be advantageous in Northern Ireland but would be best considered and prepared prior to RPA to be complementary to other structural elements.

2.5 Looking ahead, we would consider functions such as food safety and standards, health & safety, housing fitness, contaminated land and pollution, consumer protection, public health and emergency planning to require inter-council liaison arrangements. Additionally the development of community planning as an important function for Councils post-RPA will demand specific cross-council and inter-agency liaison whilst absorbing some of the activity now dedicated to community or population health issues under a variety of headings.

2.6 Although cooperation across seven councils would undoubtedly be easier than across twenty six, the organisational factors noted above, stemming from integration of service delivery across functions within the new councils, may well result in the development of different structures in different councils. It would therefore be even more important that active consideration be given to the means of coordination and liaison prior to reorganisation.

3. RECOMMENDATIONS

- 3.1 CEHOG's first recommendation to the Review of Public Administration Team sought the provision of a grouping, a team, of environmental health practitioners within central government to advise and assist in the development of policy and strategy, to cut-across departmental boundaries and to provide support and liaison between central and local government. The principle of this recommendation is reiterated but, given the greater understanding of the proposals now available, it is recommended that other options for the location of this team should now be considered.
- 3.2 It is considered important that these staff should be clearly dedicated to the interfaces between local government, central government and other bodies and organisations and should stand as a formed unit, not being otherwise divided or engaged with duties within individual employing departments or organisations.
- 3.3 It is suggested that for maximum effectiveness and to avoid the inefficiencies of the liaison arrangements in GB that a small number of environmental health practitioners should be employed as a full-time resource, allowing the development around them of the necessary liaison groups (completed by the addition of volunteers from each of the seven councils) which they would then service and support.
- 3.4 There is a need for liaison at a strategic level across councils and all partner organisations and also at an operational level across the lead environmental health officers within councils for key specific functions such as Food Safety & Standards, Health & Safety, Consumer Protection, Pollution, Housing and Public Health and for Community and Emergency Planning. This would suggest a structure that centres upon an officer of some seniority and experience, drawn from within the environmental health service, who would provide high level liaison and communication with Heads of Service, Chief Executives and with senior staff in government departments and agencies. This officer would then be assisted by specialist environmental health officers possessing developed skills within the service core functions above.
- 3.5 The full-time staff proposed for the liaison groups are considered necessary to provide continuity of contact and expertise for external communication, whilst enabling liaison group workstreams to be developed and delivered.
- 3.6 Where this proposed team should be based and employed is a matter for further discussion. A location within central government might appear desirable, however the broad focus desired of the team across the functions of several government departments might render the location within a single department disadvantageous. Conversely to establish the team outside mainstream departments might render it less effective. There are seen to be three options:
- The establishment of the team within DHSSPS-NI might seem appropriate to provide focus for a service that is primarily concerned with population health issues. This might however lead to lesser standards of communication with other departments and their related agencies where close work with DOE, with DARD, with OFMDFM, DE and others will be necessary.

- Alternatively the team might be supported from within an augmented DOE Local Government Division, whilst being established as a stand-alone body with specific terms of reference for the purposes outlined in this paper.
- The third option is that the team might be located as an entity within the new local government structure. If a Shared Services organisation serving the financial, IT and human resources needs of the seven proposed councils were to develop to fruition, that body could also become a locus for regional liaison for the environmental health service. Similar arrangements might be beneficial also for other professional groups sharing needs for local service delivery with regional coordination. (Examples might include Building Control, Fire Service, Roads and Planning.)

4 CONSIDERATIONS

This paper has assumed that the underlying principles established for the Review of Public Administration, of strong local government, subsidiarity, democratic accountability and responsiveness to local needs, remain unchanged. These principles have been focussed by the intent to provide councils within Northern Ireland with statutory powers to develop and co-ordinate community plans for their areas, a function to which environmental health would expect to make a particular contribution. Given this position it would be evident that the environmental health service, as a continuing major element in the delivery of services within and the resolution of local problems within communities, must be seen as an essential part of future district council organisation and structure.

The following points are therefore raised seeking confirmation or response:

- that the environmental health service will be based within District Councils after the Review of Public Administration.
- that a local government structure probably based upon seven district councils removes the need for Group Environmental Health Services as currently constituted.
- that there will, however, be a need for liaison and communication across councils and between councils and central government and with other agencies that is best supported by a planned team of environmental health officers who will supply the continuity and communication links for this purpose and will be the nucleus upon which the voluntary liaison groups necessary to aid the development of high quality, consistent services within the profession will form.
- that the location for this team could be within a central government department such as DHSSPSNI or DOE Local Government Division.
- that an alternative location, that might enhance the relationship between the liaison team and the councils, might be within a local government structure formed as part of a shared services regime. Although that regime might be primarily intended to gain efficiencies in human resources, or financial and IT management, the same body could also accommodate this team and others if desired to provide similar services for other professions.
- that there might be consideration given to the relative benefits of accommodating such shared services either within a single organisation or as dispersed elements with individual councils to provide a regional service for all from that location.