



**A Critical Discussion of an Operational Change at Neath Port Talbot
County Borough Council – A Case Study of Environmental Health and
Trading Standards**

A Dissertation submitted for the
Masters of Business Administration (MBA) 2018

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Student: David Mark Thomas

Student Number: P148240

Supervisor: Maria Hefferman

Declaration/Statements page

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Lastly, I am dedicating this Dissertation to my father Gwynne, who has been my inspiration and sadly is not here to see me complete this dissertation but is always in my thoughts.

Abstract

Purpose of research – The main purpose of this study is to understand the extent that operational change is required within the Environmental Health and Trading Standards service of Neath Port Talbot County Borough Council as a result of the ongoing climate of austerity and other factors external and internal to the organisation. There is considerable amount of literature on the level of austerity and the budget cuts Local Authorities find themselves in, but very limited information exists on the effect these cuts and other pressures have on the statutory provision of a food safety service. An understanding of the value of the service and change models can inform the direction and extent of any change identified.

Methodology – A pragmatism philosophy was adopted for the research as it associates scientific enquiry to use a number of data collection techniques and analysis procedures that support subsequent actions. A project team was formed to undertake a mixed methods simple research design using both quantitative and qualitative techniques in an attempt to achieve triangulation through the combination of data. The factors influencing change were identified and their strength measured to assess the change required. A pilot survey of questionnaires was undertaken and assisted the development of the project questions to identified stakeholders. A total of 31 Councilors, 58 consumers, 42 businesses and 22 staff were interviewed to collect data on the value and waste of the current system and gather ideas on service improvements. The data on each service area from the different groups of respondents was analyzed using various types of charts.

Findings – The current environment the EHTS service operates in is volatile, with uncertainty arising from proposals by Welsh Government and the Food Standards Agency on Regionalisation and proposals to overhaul the food safety system nationally. Feedback from

the questionnaires identified a highly valued service and one in which staff could make more efficient, with improvements to the administration system and adopting a more agile way of working. Consideration of a number of change models highlighted steps in the change process that should be considered, such as a number of quick wins (Kotter) and the congruence of functions (Nadler and Tushman) to create a valued efficient service. The different stages of emotion that can be expected along the change process was considered, and led to a recommendation for a necessary communication channels and support services to be put in place such as advice and counselling.

Practical implications – The study provides a good information basis for the realignment and re-structuring of EHTS services to enable the service to address the threats imposed on it whilst taking opportunities to embrace new ways of working, including agile working within a leaner system. The provision of support services to staff within the organisation would go some way to address the emotional effects staff may feel through the change process.

Abbreviations

CIEH	- Chartered Institute Environmental Health
CIPFA	- Chartered Institute of Public Finance and Public Accountability
CoP	- Code of Practice
DEFRA	- Department of Environment, Food and Rural Affairs
EHTS	- Environmental Health and Trading Standards
FSA	- Food Standards Agency
NPTCBC	- Neath Port Talbot County Borough Council
WG	- Welsh Government

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Consumer

- 1- What service do EH&TS deliver?
- 2- What services EH&TS matter to you?
- 3- If you had a food complaint who would you contact?
- 4- How would you want to contact the food service?
- 5- How often would you want food businesses visited?
- 6- How would you want food businesses visited?
- 7- Where do you want to find information on food services?
- 8- What is the most important food service that EHTS deliver?
- 9- Which areas of the food service can be improved?

Business

- 1- How would you want your business checked?
- 2- How do you want hygiene and standards visits carried out?
- 3- What services that EHTS deliver matter to you?
- 4- Where do you want to find information about EHTS services?
- 5- What do you think of the length of time hygiene and standards inspections take?
- 6- Do Hygiene and Standards visit your business enough?
- 7- Pie chart- positive / negative responses to EHTS service provided
- 8- Are you happy with the advice given?
- 9- How would you like EHTS to communicate with you?
- 10- Food subjects in order of importance

Members

- 1- What services do EHTS deliver?
- 2- What EHTS services matter to you?
- 3- Who would you contact with a food complaint?
- 4- How often would you want food businesses visited?
- 5- How would you like to contact the department?
- 6- How would you like high risk food businesses checked?
- 7- How would you like low risk food businesses checked?
- 8- How would you like to find information about the food service?
- 9- Rate food services in order of importance

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Chart 1 – What stops officers inspecting?

Chart 2 – What stops you going out?

Chapter 1 - Introduction

1.1 Aim

A critical discussion of an operational change at Neath Port Talbot County Borough Council (NPTCBC) – A case study of Environmental Health and Trading Standards (EHTS).

1.2 Objectives

- Using secondary literature, discuss models of operational change in the public
- Critically evaluate the implications of operational change for a range of stakeholders
- Undertake primary research in order to evaluate the proposed operational change at NPTCBC EHTS
- Synthesise primary and secondary research to provide recommendations to support an appropriate operational strategy for the organisation

1.3 Background to NPTCBC

The 1994 Local Government (Wales) Act created 22 Unitary Authorities in Wales with responsibility for all aspects of Local Government (ONS, 1996). NPTCBC was formed from the County Council of West Glamorgan and a merger of Port Talbot district Council, Neath Borough Council and part of Lliw Valley Borough Council. The unitary authorities including NPTCBC came into being on the 1st April 1996.

NPTCBC is a Unitary Authority, situated in South Wales and is a recognised statutory Food Authority. The towns of Neath, Port Talbot and Pontardawe are the largest settlements in the Borough. A number of other villages and settlements are dispersed throughout the remaining

rural valley areas of the County Borough. The County Borough serves a population of approximately 139,800 (Census, 2011) and covers an area of 44,217 hectares. It is the seventh largest authority in terms of population in Wales. There are approximately 1666 food/feed premises within the County Borough (being circa 1422 food premises and circa 244 feed premises) in which food or drink and feed or drink is produced, manufactured, processed, stored or sold (Pearce, 2017).

This reorganisation in 1996 merged the Trading Standards department from the County Council with the Environmental Health departments from the District and Borough Councils to form a Community safety department. Appendix 1-4 shows the structure and number of staff employed to provide the service.

1.4 Rationale for study

“Doing what is “right” in government is a matter of responding to conflicts and negotiating with various interests much more than it is for a corporate executive trying to implement a strategy”

(Kempling, 2009) pg. 330

This dissertation aims to establish the extent that operational change that is required as a result of austerity and the subsequent restructuring exercises of 2012 and 2015 to provide a food safety service that protects public health, satisfies the FSA framework agreement and the Authorities vision whilst remaining customer focussed.

Local Authorities operate in a highly politicised environment, which is influenced by decision on a local, regional, national and international stage in circumstances that are outside its control e.g. Austerity agenda of national government, BREXIT etc.

The challenge for public sector organisations is to adapt and become responsive to the needs of its customers to be able to provide value for the services it is responsible for delivering. A number of attempts have been made to restructure/reorganise/regionalise/nationalise Councils or functions of Councils through the Simpson report 2013 and the Andrews report 2014, however the current proposals of the White paper on regionalisation have receded to a discretionary agreement of Authorities to share or merge functions.

Since 2010, Authorities have existed in a constant period of change due to budget cuts; the researcher will outline the organisational structure of NPTCBC and give an insight into the economic and political climate in which it currently exists.

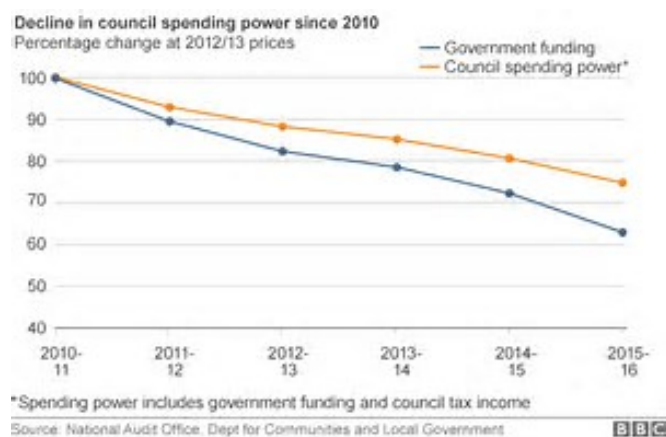
This study is required due to the reduction of departmental budgets, loss of staff numbers to provide the necessary savings in the climate of austerity within the public sector. These cuts have had a direct effect on the functionality of the EHTS service and current strategic departmental business plans (Nutt, 2018a) have identified the need to change.

1.5 Current climate within Public sector

The UK Governments Austerity agenda has resulted in a reduction of 22% in Government spending on public services since 2010, (Figure 1) (The Economist, 2017). Since 2010 Local Government has undergone budget cuts and an agenda of austerity from Central Government, which has had an effect on the delivery of public services.

The budget to LA's have been cut consistently which has affected their spending power and the services they can provide (figure1). Councillor Debbie Wilcox (Newport), WLGA Leader highlights that Environmental Health has been cut by over 40% and further budget cuts "have the potential to seriously compromise the health and well-being of the most vulnerable members of society particularly in terms of food safety" (Wilcox, 2017) pg. 1.

Figure 1 Decline in Council spending power since 2010



Prior to the Coalition Governments public spending review 2015/16, the Local Government Association estimated a funding gap of £16.5 billion a year by 2019/2020 (Darinka Asenova, 2015). These financial uncertainties motivate local authorities to evaluate every possible funding source (Accountancy, 2015), such as the introduction of car parking charges, planning applications and garden waste removal, while two-thirds are dipping into reserves to balance the books (Butler, 2017). Services would have to be efficient and as lean as possible to meet the customer demands, therefore strategic change is important to the public sector as successive cuts to Council budgets have left many close to breaking point (Butler, 2017).

The WG published the provisional settlement for Local Government on 10th October 2017 to enable budget planning for 2018/19, this stated that NPTCBC budget will be cut by 0.4%,

which will add to the circa £77million of savings since 2010 (Philips, 2017). WG have provided money to protect core services such as Education and Social services in Wales (an additional £62 million in 2018/19) (Drakeford, 2017), however the wider health budget which includes EHTS have suffered as a result.

Figure 1, above also clarifies a prediction made in 2011 by the Office for Budget Responsibility (OBR) that by 2017, there would be around 700,000 public sector jobs lost due to further budget cuts between 2015/16-2016/17 (Holehouse, 2011).

The Chartered Institute of Public Finance and Accountancy (CIPFA) recognises that public services must look at innovative ways to balance their budgets and income generation or receive a return on investment. Against this backdrop of reducing budgets, the Authority is exploring income generation initiatives at Corporate Director level, to incorporate this vision in its broader infrastructure (Nolan, 2016).

According to Leaker (2016), budget cuts have already impacted employability with the current Office for National Statistics announcing, since March 2016 public sector employability rates over the UK has decreased by 13,000 taking the level to lowest point since 1999, the adapted figure 2 below illustrates.

Figure 2 - Public Sector employment



Source: (Leaker, 2016)

The austerity measures have caused impacts on employment in the public sector, such as redundancies. The levels are still continuing to fall and are mostly likely to fall more, when the 1% extra cut takes place. Therefore, this information justifies possible reasons why public-sector employees feel so pessimistic about their futures and de-motivated.

1.6 Providing an EHTS service in the current climate

Since 2010, the UK government has embarked on a policy of austerity that has cut budgets to WG by 40% for public services (Institute for Fiscal studies, 2015). The budgetary pressure is due to continue as WG continues to reduce its core funding to Local Government by 1% in 2019/20 and projected savings for NPTCBC of £58 million are reported for the next 4 years to March 2023 (Nutt, 2018a).

Due to these cuts, services such as EHTS have focussed on statutory duties and looked at either stopping certain functions or the commercialisation of functions where value is identified. The

Business plan for the Planning and Public Protection service was updated in 2016/17 to reflect the aim of the 2015 restructure and align itself with the organisations Corporate plan.

Public Protection budgets are reducing, whilst the services stay within the set budgets (Simpson, 2017). New legislation such as the Public Health (Wales) Act 2016 (Welsh Government, 2017) are enforced by EHTS which increases the pressure on existing resources.

The vision statement within the plan is for: -

“A proactive front-loaded service where everyone works together to achieve a shared purpose of promoting and creating safe, healthy and sustainable places to work and live in”

(NPTCBC, 2016) pg.3

To achieve this vision, the EHTS department is aligned to perform public health functions such as the function of Housing enforcement, health and safety, food safety, pollution control, statutory nuisance, trading standards, scams and fraud and infectious disease control (Nutt, 2017).

The restructures in 2013 and 2016 (appendices 2, 3 and 4) show the reduction in the number of overall staff throughout the service including the loss of experience within high grade posts (Environmental Health Officers).

An analysis of the current strategy of service delivery and evaluation of its effectiveness to deliver value to its customers, whilst identifying waste to create leaner focussed systems (Seddon, 2005) would have a positive contribution for the deliverance of the vision and strategy of the organisation and service.

1.7 Food and Feed Control

The FSA is the central competent authority overseeing official feed and food control undertaken by local authorities (FSA, 2010). Local authorities such as NPTCBC, are responsible for enforcing standards in retail and certain manufacturing businesses and also manage the Food Hygiene Rating scheme on behalf of the FSA.

The Food safety and Health Protection team and retail team of the Trading Standards service undertake food hygiene and food standards interventions at food businesses respectively, in accordance with the framework agreement with the FSA.

Food hygiene intervention is defined in EC Regulation 852/2004 as:

“the measures and conditions necessary to control hazards and to ensure fitness for human consumption of a foodstuff, taking into account its intended use”

(Food Standards Agency, 2018) [accessed 23/1/2018]

Food standards legislation is set out by DEFRA (2015) as:

“specific requirements for the labelling, composition and, in some cases, safety parameters for specific high value foodstuffs which are potentially at risk of being misleadingly substituted with lower quality alternatives”

www.gov.uk/guidance/food-standards-labelling-durability-and-composition

[accessed 21/2/2018]

In 2014, the FSA undertook an audit of the service (FSA, 2014a), against the framework agreement, and subsequently produced an action plan against areas for improvement (FSA, 2016). Areas highlighted for improvement include a need to intervene in low risk food businesses and consistency of inspections.

The FSA is currently looking to reform the current system through the “Regulating our Future” agenda (FSA, 2017a). The proposed system aims to provide a more flexible approach to food and feed regulation by utilising private sector inspectors and a reliance on information provided by businesses to determine inspection rates rather than independent local authority staff. This is of concern to the local authority enforcement officers and raises issues on the protection of public health and potential food poisoning outbreaks (DPPW, 2017b), at a time where Food businesses are achieving high standards of hygiene, structure and confidence in management shown in a 94.6% broadly compliant rate in NPTCBC (Pearce, 2017).

The uncertainty of BREXIT which will change patterns of food production, trade and consumption with neighbouring Countries (FSA, 2017a) is a challenge faced by the service, as the main enforcement legislation directly comes from European Directives (881/882/EC 92), and investigation into the practices and procedures overseas may be more difficult post BREXIT.

The strategy published in the Food and Feed delivery plan (Pearce, 2017), which is produced annually as part of the obligations of the framework agreement, is linked to organisational goals as they underpin the vision of the Authority to:

“pursue new and existing opportunities for economic growth so we can sustain our diverse communities for many years to come”

NPTCBC, 2017 pg 5

It will achieve its obligations to the FSA through the Well-being Objective Aim 3: -

“To develop the local economy and environment so that the well-being of people can be improved “

(NPTCBC, 2017) pg.5

The current structure and functions of the Food and Health Protection service and Trading Standards service are aligned with their traditional professional activities and the legislation delegated to staff in line with professional training and competencies (Nutt, 2017).

The positive aspects of this approach are a clear focus on “who does what” and training can be identified accordingly. The drawback to this approach maybe “silo working” and poor communication with staff outside the team leading to an approach that is not holistic.

The FSA audit report 2015 (Food Standards Agency, 2015), highlighted performance and operational differences between the two services, which will be evaluated in the context of this report to determine the direction of strategic change for the service and organisation.

A strategic change to incorporate functions that add value to a single intervention may produce efficiency and budget savings whilst improving consistency and maintain the professional and public confidence in the food and feed control regime.

The Vanguard system of reviewing the functions will be used to guide the evaluation of the current system to provide value and reduce waste in the proposal of strategic change (Seddon, 2005)

1.8 Summary

With the budgetary pressures on public spending set to continue, the EHTS service must consider a strategic change to service delivery looking at a review of the system of food safety delivery between two distinct professions that existed in two different organisations 20 years ago.

The researcher intends to undertake a review of current literature from a variety of academic and industry sources in the next chapter to enable a comprehensive review of the organisations strategy and business operations model currently being utilised.

Chapter 2 - Aim of Study

2.1 Introduction

Objective: Using secondary literature discuss models of operational change in the public.

This chapter will evaluate literature relevant to this dissertation by examining relevant research papers, academic journals, theories, models and case studies considered applicable to change management. Specific consideration will be given to the influence and power of stakeholders / customers who interact with the EHTS service. This literature review will critically assess a variety of change models, such as Kotter's eight stage process (Kotter 1996), Lewins 3 stage process (Lewin 2018), Satir model of change, Congruence model and the Kubler-Ross model.

2.2 Change Strategies

The Oxford dictionary definition of change is:

“An act or process through which something becomes different”

www.oxforddictionaries.com

[accessed 10/4 2018]

Change happens at different levels, magnitude, different focus and happens in different ways (Hodges & Gill, 2015), and is unavoidable in all types of workplaces (Lewis, 2012). This emergent change is evident when guidance becomes updated, priorities change or when members of staff leave. Change management is about moving from one state to another, specifically, from the problem state to the solved state (Jung, 2001).

In a time of change, the following quote is very pertinent:

“A man who is used to acting in one way never changes; he must come to ruin when the times, in changing, no longer are in harmony with his ways.”

([www.constitution.org.mac.prince06.htm](http://www.constitution.org/mac/prince06.htm), 1515) [accessed 5/3/2018]

2.3 External and Internal influences – The Need for Change

(Burnes, 2014) acknowledges that external environmental factors and internal influences shape the design process; with caution to the method of interpretation. The external environment influences the management and functioning of the organisation (Mullins, 2005) and the PESTEL technique was used to analyse the macro-environment of the EHTS service (appendix 5), which considers the political, economic, socio-cultural, technological, environmental and legal influences.

The stakeholder analysis in Figure 16 identifies the main influences affecting the service, these are discussed in more detail below to highlight the volatility and extent of influences external organisations exert on the service. The importance of the micro-analysis of the organisations strengths, weaknesses, threats and opportunities (Appendix 6) as advocated by (Ansoff, 1969), may provide choices and identify risks which aid the decision making and problem-solving process (Mullins, 2005).

2.4 External Factors

2.4.1 Public sector change

Current organisational behaviour can be affected by past strategic decisions and the development of core values and patterns of leadership (Hayes, 2002), Local authorities have been subjected to a number of initiatives and philosophies in the past that have shaped the current structure, the systems of work and the philosophy and culture within the service. These are discussed in detail below.

The Public sector has had a number of initiatives placed on them over the years to improve performance such as ISO 9000, Excellence, Investors in People and Charter Mark. ISO 9000 was a quality standard introduced in 1987 (Seddon, 2000) to improve the UK's industrial competitiveness by controlling work by controlling procedures.

Initiatives that have been implemented in the past include Investors in People, Charter mark and best value. The best value initiative has had the biggest impact on the EHTS service.

The Best Value framework was developed by the Government between 1997 and 2000 in close partnership with Local Government. This duty, which came into effect on 1st April 2000, was brought about by the Local Government Act 1999.

Local councils had a duty to achieve Best Value by constantly seeking to improve their services to meet the needs and demands of society. To achieve this, local authorities had to:

- produce an annual performance plan which showed how the authority was performing, year on year, and a comparison to other local authorities and service providers
- carry out a thorough reviews of all services of the authority over a five-year period
- produce action plans for the improvement of reviewed services
- strive for year on year efficiency improvements in all service

The Authority carried out a systems-review of its services within EHTS in 2011, which resulted in the creation of a new business team to provide advice and information to businesses before they started trading (EHTS, 2011). The systems thinking approach challenged the design and management of the processes and decision making of the service which were based on command and control thinking and to focus on the customer to deliver a lean system by reducing waste (Seddon, 2005).

In 2014, Vanguard published a report that stated £16 billion a year of public money could be saved by tackling a failure to understand people and provide them with what they need (Vanguard, 2014). The Vanguard Method of systems review is the means for helping service organisations change from a conventional ‘command-and-control’ design to a systems design. (Seddon, 2018).

2.4.2 EHTS service change

There are a number of threats and opportunities that directly affect the EHTS service from the external environment, on a national basis. These were identified in the PESTLE analysis in Appendix 5, and are considered in more detail below.

The EHTS department has undergone a number of restructures shown in appendices 1-4 that have also had the effect on the decision-making process, as EHTS was part of the Directorate of Environment and Consumer Services, before a restructuring saw the pollution and waste enforcement functions moved to the Environment directorate and the disbandment of the Health promotion team (NPTCBC, 2009). The remaining service was put under Social services, Health and Housing directorate in 2009 under the Head of Service for Business Strategy and Public Protection.

In 2015, committee report (NPTCBC, 2015a) identified a £200,000 forward financial plan saving by restructuring the service within the Environment directorate and Head of service, whilst re-joining the air pollution service within the service and Pest Control merging with the waste enforcement and dog function. The EHTS administration function would join the Public protection business support Unit under the management of the Building Control Manager.

The savings made as part of the restructure, meant that the service was moved from a remote office into The Quays, Baglan where the other services under the Directorate were based with the IT and HR functions of the Authority.

The relocation and re-structuring of functions required a review of existing systems to integrate the service within the systems and support services that existed within the Quays and the Environment Directorate e.g. telephone system. The loss of the dedicated administrative team and the addition of the air pollution team meant that internal structures had to be reviewed and integrated as required.

2.4.3 Brexit

The EU referendum on 23 June 2016 saw Britain vote to leave the European Union, and the triggered Article 50 of the Lisbon Treaty which is Britain's official letter of resignation on 29th March 2017 triggers a 2-year timescale (BBC, 2017).

The CIEH identified that leaving the EU has the potential to create serious implications for the invaluable work that Environmental Health Professionals do in the UK (CIEH, 2017). Issues such as the need for new food safety checks, if the Government is unable to conclude a trade deal with the European Union. The fact that over 50 separate EU Directives and Regulations alone that govern Food standards in the UK, whilst more than 40% of all legislation coming out of EU is food related (CIEH, 2017), reinforces the close relationship and influence the EU has on the service.

2.4.4 Local Government Reorganisation

On 31 January 2017, the WG published their white paper; 'Reforming Local Government: Resilient and Renewed'. White Paper cites the Wellbeing of Future Generations (Wales) Act as a requirement for local authorities to take a different approach to working (Action, 2017). The summary response to the white paper highlighted the change environment the food service operates in, as 42% of respondents stated that public protection services should be delivered on a regional basis, and that Environmental Health and Trading Standards could be delivered on different geographical footprints (WG, 2017).

2.4.5 WG legislation

The Government of Wales Act 1998 established the WG as the Welsh Assembly Government in 1999 (National Assembly for Wales, 2018). The Richard commission 2004 report highlighted practical issues were hampering its legislative requirements, which influenced the UK Government's White Paper, Better Governance for Wales, published in June 2005 (Office of the Secretary of State for Wales, 2005) which in turn led to the Government of Wales Act 2006 which replaced the corporate body with a new National Assembly of Wales and separate executive. The Act enabled the Assembly to make laws in 20 areas devolved to Wales in which schedule 7 of the Act lists the areas, of which Local Government, housing and food safety are included (Cabinet Office, 2013).

Local Government services including the Public Protection service is undergoing change to address the challenges of austerity. The stakeholder analysis in figure 17 identified the WG as a key stakeholder, the analysis shows the importance and effect WG has on local services.

Since 2013, WG has introduced has introduced 3 major pieces of legislation that has had a direct impact on the resources of the public protection service. These include:

1. Housing (Wales) Act 2014 which introduced the registration and licencing of private landlords in Wales
2. Food Hygiene Rating (Wales) Act 2013 which introduced the mandatory system of food businesses displaying the "scores on the doors" following inspection by Enforcement Officers, and

3. Public Health (Wales) Act 2017, which introduces the licencing of special procedures such as tattoo establishments, acupuncture and intimate piercing.

This legislation is enforced and managed by Public Protection services in Wales alongside its other functions, therefore putting additional pressure on service delivery.

2.4.6 Public Protection Wales

The Directors of Public Protection Wales (DPPW) is the collective organisation of officers heading up public health services within local authorities. DPPW's mission statement is:

“to help deliver a safer, cleaner, fairer and healthier Wales”

(DPPW, 2017) pg. 3

In November 2016, the DPPW set out its principles for the future of feed and food regulation to protect consumers and public health and protect the integrity of the food chain from farm to fork (DPPW, 2016). DPPW are currently engaged in a change programme to address a number of threats and opportunities to Public protection services in Wales (DPPW, 2017). The change programme aims to unify and promote best practice throughout Wales, and sets out new ways of working through furthering the use of technology, developing community capacity, generating income, rolling out an intelligence operating model and enhancing partnership arrangements (DPPW, 2017a).

2.4.7 Food Standards Agency

The Framework agreement between Local Authorities and the FSA, provides the mechanism for the Agency to influence and oversee local authority enforcement activity (FSA, 2010).

The amended agreement dated 2010, sets out the FSA's vision and commitment to the Governments Better Regulation agenda, to ensure the Food safety service operates following the following 5 principles, to ensure it is 1. targeted, 2. proportional, 3. accountable, 4. consistent and 5. transparent (FSA, 2010).

The requirement of an annual service delivery plan in Chapter one of the agreement for approval by members or a senior Officer (Pearce, 2017), focusses the authority on the service and is an expression of commitment to the resources required to ensure the parameters of the agreement are met.

The Food Law CoP Wales (FSA, 2014) gives guidance that Local Authorities must have regard to when performing their food enforcement functions such as minimum intervention frequencies (Appendix 7). The CoP provides the definition of authorised officers and lead officers who perform the food safety functions. The qualification and experience criteria for officers is important as it promotes the requirement of professional training and the restriction of activities to officers based on competencies and experience. Continuing Personal Development (CPD) is also a requirement for all officers to maintain competence with 10 hours / year food related training a necessity. Consideration on the existing qualifications and experience within the EHTS service must be undertaken to establish the versatility and resilience.

2.4.8 The Food Law (Wales) Code of Practice

In 2017, this CoP was updated in England (FSA, 2017c), and 1. clarified risk descriptors used in the food establishment intervention rating schemes, 2. provides additional guidance on the communication of food incidents and hazards, 3. addresses food criminality and 4. clarifies qualification and competency requirements of local authority officers.

The Food Law Code of Practice (Wales) Review 2018 ran from 10th January 2018 to 23rd February 2018 with the main proposals being to address comments in the earlier consultation in 2015 and reduce unnecessary regulatory activity; and revise the competency and qualification requirements for authorised officers involved in delivering Official Controls and other enforcement activities (FSA, 2018).

Concern has been expressed on the removal of stated baseline qualifications within the CoP for authorised officers to a practice guidance that does not exist. This would jeopardise the requirement of Environmental Health Registration Board (EHRB) status, as the guidance would not have statutory status (Wales Food Safety Expert Panel, 2018).

2.4.9 FSA - Regulating Our Future (RoF) Agenda

In 2017, the FSA published the report 'Regulating our Future – Why food regulation needs to change and how we are going to do it' (FSA, 2017a) explaining the vision to change the direction of food deliver regulation to create a modern system that will consider the changes in food production, trade and consumption that will take place when the UK leaves the European Union.

The FSA cites the current regulatory system as outdated that has not kept pace with technological change and not flexible enough to adapt to change, RoF aims to provide a dynamic and flexible approach to deliver 5 main principles, these are:

1. Getting it right from the start – business start-up and enhanced registration, to assist businesses get things right from the start.
2. Segmentation - fitting business into the regulatory model by tailoring decisions in a proportionate manner based on a clear picture of UK businesses
3. Assurance – getting the evidence that business is doing the right thing and taking account of all available sources of information
4. Intervening when things aren't right and recognising those businesses doing the right thing
5. Businesses should meet the costs of regulation, which should be no more than they need to be.

The fundamental changes to the Food regulatory system would have a dramatic effect on the food service. DPPW highlighted the concerns to the FSA in its response (DPPW, 2017b) that the proposed system was overly complex and does not protect the consumer or the integrity of the food chain from farm to fork, public protection arrangements would be undermined and the proposals are not based on evidence or fact (DPPW, 2017b). The DPPW are supportive of an enhanced registration / licencing system and the concept of segmentation however, stated that National Inspection strategies and certified Regulatory Auditors cannot implement the Food Hygiene Rating scheme in Wales due to devolved legislation.

One proposal within RoF, is the introduction certified regulatory auditors (CRA's) within the private sector to obtain direct evidence of business compliance and could also be authorised by Local Authorities to undertake other activities within their areas of responsibility (Spear, 2017). Spear, 2017 raises the concerns of Environmental Health Practitioners that the introduction of CRA's is a step towards self-regulation. DPPW 2017b, comments that the current regime is working and then Food Hygiene Rating scheme in Wales has raised standards, which would be put at risk and affect consumer confidence if CRA's were introduced.

The FSA board meeting in December 2017 reported that the introduction of CRA's will not be a priority in terms of the progress of the programme, and a poll CIEH members found that eighty-five per cent said that third party auditors should not assess FHRS scores (Hatchett, 2017).

2.5 Internal Factors

2.5.1 NPTCBC food safety audit 2015

The Food Standards Act 1999 and the Official Feed and Food Controls (Wales) Regulations 2009 confer powers on the FSA to set standards, to monitor and audit local authority food and feed law enforcement services.

The FSA regulates local authorities in their role as the central competent authority through a system audits. Audits are undertaken against the criteria in the framework agreement i.e. service delivery plan etc. A full audit was undertaken of NPTCBC arrangements for the delivery of official food and feed controls in 19th – 24th May 2014 (FSA, 2015) concluded that there are key areas of improvement and reported strengths in a number of areas (Appendix 8).

The audit was more positive than the headline points in appendix 8, as some of the areas for improvement were based on a small sample of findings in a rigorous auditing environment, against a backdrop of large budgetary savings. A strength was the investment in training which was recognised for the future of service delivery (NPTCBC, 2015b).

A follow up visit to look at the action plan following the 2015 audit took place on 8th & 9th August 2016. The FSA conclusions following the visit revealed that out of a total of 29 recommendations, 16 had been completed, 9 were making good progress with limited progress identified in 3 and 1 recommendation could not be tested (FSA, 2016). This revealed that the service had successfully improved in a large number of areas and was dealing with identified issues, however also focussed the service on the requirement for the rigorous adherence to policies and procedures by all staff.

2.5.2 Corporate Plan

NPTCBC's Corporate Plan 2016 – 2019 (NPTCBC, 2016) sets out what is important and what the priorities are for the Authority in the current climate and is finalised by agreements between the Chief Executive and the Leader of the council. The CAMMS system was introduced in 2018/19 to link Wellbeing objectives in the Corporate plan to improvement priorities and steps within businesses plans by reporting on a quarterly basis to Members.

Food safety contributes to the “wellbeing objective” to improve the wellbeing of all adults who live in the County Borough, and the “Improvement priority” that people are safe and feel safe-steps by ensuring that:

1. food premises are inspected to ensure that the food provided is fit for human consumption and the premises from which it sold are hygienic and,
2. breaches in the integrity of the food chain from farm to fork (feed, animal health and food standards) are investigated (Nutt, 2018a).

The key national performance indicator for the food service is PAM/023 “Percentage of premises operating in a controlled and safe manner, being broadly compliant with food hygiene requirements” (Welsh Local Government Association (WLGS), 2017). Reports go to the Cabinet Board Regeneration and Economic Development for member scrutiny on the performance of the service on a quarterly basis.

2.5.3 Food and feed service delivery plan (FFSD)

All Local Authorities must produce a FFSD under the framework agreement to set out how food and feed controls are delivered (Food Standards Agency, 2010). The plan for 2013/14 shows that the service priorities changed to reflect the loss of staff and expertise following the re-structuring exercises, as a result of the Government’s austerity agenda (NPTCBC, 2012). A commitment to deliver 80% interventions of higher risk establishments, to include 100% category A and B high risk businesses and Category C, where a rating of “5” was not achieved under the FHRS. This approach was introduced to enable resources to be used for category “D” premises which handle high risk open food (FSA, 2015).

The food hygiene service also introduced an alternative enforcement policy for food businesses and identified a number of businesses where verification visits were carried out instead of the more time consuming full inspections. The pest control service was restructured and put under the management of the manager of the food service; which enabled pest control officers to be

utilised to undertake spot checks on Food Hygiene Rating scores on food businesses (Thomas, 2014).

The framework agreement between NPTCBC and the FSA brings together the obligations on feed and food law enforcement authorities (FSA, 2010). Chapter two of the agreement contains “The Standard” which outlines the scope of the agreement and the arrangements required to be implemented for the enforcement of food hygiene, food standards, feed law, imported feed and imported food legislations.

Part 7 of the Standards states that the authority shall:

“carry out interventions /inspections (as required by the relevant Code of Practice) at all food hygiene, food standards and feeding stuff establishments in their area, at a frequency which is not less than that determined by the intervention rating scheme”

(FSA, 2010) pg. 15

Appendix 7, shows the minimum intervention frequencies stated in the Food Law Code of Practice (Wales) April 2014.

A FSA audit (FSA, 2015) identified that low risk TS and EH businesses were not being inspected in accordance with their intervention period due to the risk based intervention programme to concentrate on the higher risk businesses.

2.5.4 Income Generation / Cost recovery Initiative

A priority for the Authority under Digital by Choice is “improving customer experience, making better use of public money” (NPTCBC, 2016), the objective is to improve customer /

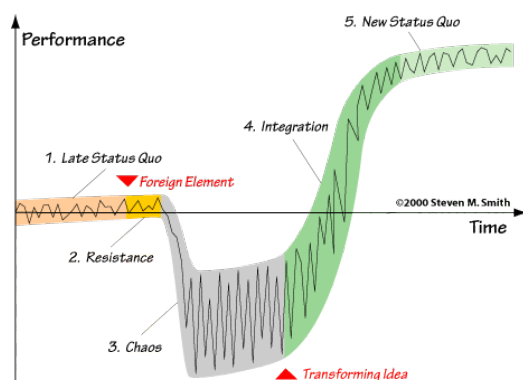
citizen access to services and functions and to improve efficiency. Part of this objective is also to increase and identify new income generation opportunities.

In 2018, the service introduced a new service for the management and treatment of Japanese Knotweed (NPTCBC, 2018a) and started charging for business advice (NPTCBC, 2018). The charges associated with these services were based on cost recovery of existing staff time and office costs. The use of existing staff in the delivery of new services will have an impact on the provision of existing services.

2.6 Models and Theories of Change

Satir's change model (1960's) (figure 3) identifies the foreign element introduced to initiate the change from the status quo into a state of chaos that encourages the generation of ideas. The main foreign element in this case was the introduction of the systems review process to identify waste and establish what is of value to customers (Seddon, 2005).

Figure 3. The Satir model of Change (1960's)



www.stevenmsmith.com/images/satir_graph.png

date accessed 3/3/2018

Research by Creed, 2013 suggests that force field analysis and related change processes run the risk of missing key complexities due to the linear representation of internal and external change. Consideration should be given to the factors of the force-field analysis morphing to understand the forces of change due to an inverse principle.

The change discussed in this report is one of planned change as it occurred in a stable environment, and is aimed at improving group effectiveness with a top-down orientation (Northouse, 2015).

(Mullins, 2005) pg. 910 states that planned change “represents an intentional attempt to improve, in some important way, the operational effectiveness of the organisation”. The benefit of planned change is that it enables a range of peoples’ assumptions and attitudes towards the organisation to be considered and is an opportunity to look into a whole range of possibilities of looking at things. This aids the understanding of people in the organisation and possible limitations or advantages of the change process (Green, 2009) pg. 94.

A transformation of the organisational structure was undertaken to ensure businesses are subjected to less enforcement visits, public safety is not compromised, Food law CoP is satisfied and EHTS resources are maximised which would address the force for change in appendix 9.

Balogun and Hailey (1999) suggest that the focus of the change strategy may need to change over time, however transformational (discontinuous) change was required to “do things differently” (Aldisert, 2012) to reconfigure the components of the organisation to ensure they are aligned with external pressures. As transformational change is more intense than

incremental change (indicated by stress, dislocation, and trauma associated with change (Northouse, 2016),) the point of leadership of change is greater. Restructuring the Food Safety and Trading Standards service requires the EHTS manager to lead and inform senior officers and political members whilst, initiating the change process. Change in the EHTS department can be seen as incremental to the organisation, rather than a “big bang” affecting the whole of the Authority (Studdert, 2018)

A change in the Food safety and Trading Standards service reflects Caldwell’s management model (Caldwell 2003), where change agents are seen as middle-level managers/functional specialists who have responsibility for delivering or supporting specific elements of strategic change programmes, indicating that primary motivation resides with NPTCBC whilst the stimulus for the change remains in the external environment (Benjamin and Mabey, 1993).

2.6.1 Kotter’s Change model

Kotter’s Eight stage change process seen in figure 4 below, is based on the re-engineering of processes or altering of strategies by addressing barriers to change (Kotter, 1996). Kotter identified inwardly focussed cultures, paralysing bureaucracy, parochial politics, a low level of trust, lack of team work, arrogant attitudes, a lack of leadership in middle management and the general fear of the unknown as barriers to change.

Figure 4 – Kotters eight stage model



(Kotter, 2013)

Kotter's eight stages places an emphasis on getting early stages right such as building coalitions and setting the vision rather than the later steps of empowerment and consolidation (Green, 2009) pg130. This change model is linear rather than cyclical, and emphasises the energy required to start the process and management involved in the early stages, with more of a consolidating role later in the process. The early stages to create the climate for change, include:

Stage 1, as the creation of urgency is intended to create impetus and get the change started (Kotter, 2002), whilst stage 2 forms a guiding team that will provide necessary skills, credibility, reputation and authority required to “provide change leadership” (Kotter, 2002) pg. 4. Stage 3, builds the vision to provide a picture of the future, this aim to clarify and motivate people in the direction of change and coordinate the actions of different people (Kotter, 2009) the vision should therefore be sensible, clear and simple. Communication in stage 4 is intended to promote understanding, whereby “deeds are often more important than words” (Kotter, 2002) pg. 4, therefore the guiding team should role model any new behaviours (Green, 2009).

Obstacles to change are removed in stage 5, as people are empowered and encouraged to experiment different systems. Stage 6 looks for quick wins to visibly reward improvements,

and consolidate (stage 7) the change towards the vision through promotion and new projects and resources. Stage 8 aims to embed the new approach to ensure understanding of the new behaviour to organisational success (Green, 2009) pg. 111.

A strategy for change must consider these barriers and the emotional turmoil the people will experience due to the change (Kotter, 1999). Kotter highlighted the 4 most common reasons people resist change as a desire not to lose something of value, a misunderstanding of the change and its implications, a belief that the change does not make sense for the organisation and a low tolerance for change. The researcher aims to identify the reasons for resistance to inform the strategy for implementation of the findings of the review.

Following Kotter's change model (1995), stages 1-4 aim to address any issues of resistance, each of these stages must be followed as resistance may follow should they be missed. "An individual's degree of resistance to change is determined by whether they perceive the change as good or bad, and how severe they expect the impact of the change to be on them" (Kotter, 2009)

Kotter recognised that change does not happen easily due to a long list of reasons his eight-step model is designed to address each of these reasons such as lack of trust, low level of teamwork, inwardly looking cultures (Kotter, 2009). These reasons were not identified in Lewin's force field analysis (appendix 9) as areas of concern to provide any strong resistance.

2.6.2 Stakeholder Theory

To manage change successfully, the researcher identified important stakeholders (figure 15) and gauged their predisposition to either support or resist the change (Etzioni (1975), Robbins (1986)). This stakeholder approach, first introduced by (Freeman, 2010), considers stakeholders and recognises the importance of a strategy to deal with them is important to accomplish the projects goal (Freeman, 2010). Freeman recognised that organisations were complex with political, technological, economic and social factors influencing its success.

There must be an acknowledgement that external factors influence and affect the service and the organisation such as denial (Freud, 2010) otherwise the success of the service will be threatened and important issues overlooked. A system design can only be accomplished with stakeholder participation and their involvement in solving system wide problems (Ackoff, 1974). The benefits of analysing and realising stakeholder power and disposition was acknowledged by Grundy (1997).

The stakeholder map in figure 15 identifies that most stakeholders are internal to NPTCBC whose interest revolves around their involvement with Food safety, however the hierarchical structure of NPTCBC affords power to individuals and groups based on positional power (Northouse, 2015), who have limited interest in the service but are very influential.

2.6.3 Deming Cycle

The focus of the review was the overlap within the service for the investigation and inspection of food businesses by the separate EHTS sections. The method of producing a theory to explore is supported by Deming:

“Without theory, one has no questions to ask. Hence without theory there is no learning”
(Deming, 2005) pg. 201

The Deming cycle in figure 5 below, emphasises the systems review approach and the fact that the system that people work in, and the interaction with people may account for 90 or 95 percent of performance (Deming, 1998).

Vanguard (2014) developed this model from Deming’s Shewart cycle 1993 into systems thinking with emphasis on managers dealing with the failings of the current system at “Check” (Vanguard, 2018), which modifies Demings “study” step to “check” results towards what we learn and what went wrong (Moen, 2009).

Figure 5 – Plan–do-Check-Act cycle

Figure 1: The Plan-Do-Check-Act Cycle

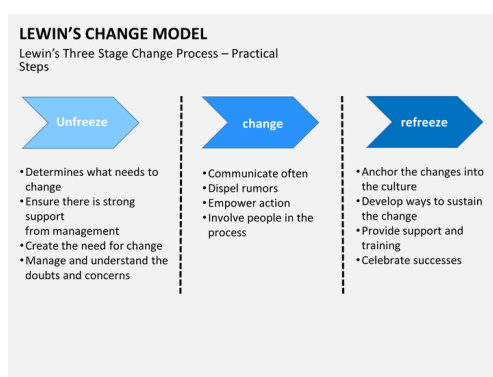


www.mindtools.com (accessed 21/3/2018)

2.6.4 Lewin's 3 Stage Change process

Lewin change process is also applicable and will be considered at every stage through the unfreeze to the change and refreezing of the system (figure 6). The system review flow in appendix 12, highlights the stages that mirror Lewin's change model practical steps and reflect Kotter's 8 stage plan.

Figure 6 - Lewins Change model



(Lewin, 2018)

Lewin's "3 stage change process" uses a notion of "homeostasis" (Green, 2009) whereby an organisation will move from its current state towards a state of equilibrium and establish the changes in face of a disrupted change, to maintain a different stabilising state. Unfreezing the status quo to move towards a new desired frozen state which is reinforced through supporting mechanisms such as policies or structures, to become the new status quo involves participation and involvement of people in the process to implement the change with the development of new attitudes or behaviours (Mullins, 2005) pg. 910.

2.6.5 Congruence model

A Local Authority can be viewed as a series of subsystems which is aware of changes in the external environment (Green, 2009) such as those identified in the force field analysis (appendix 9). The Nadler and Tushman Congruence model 1997 (figure 7), considers the political environment as a subsystem (informal organisation). The congruence model encourages a problem focus by looking at the dynamics of the organisation during the change process (Green, 2009) and is therefore useful for a post-change analysis.

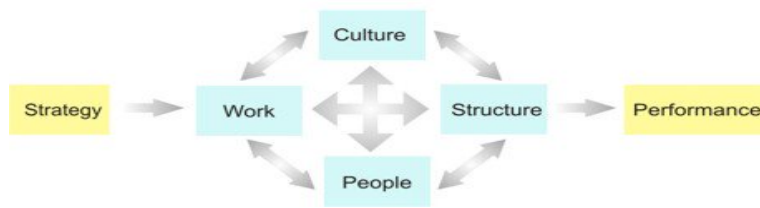
Nadler writes that the model is “tool for organising your thinking, rather than a rigid template to dissect, classify and compartmentalise what you observe” (Green, 2009) pg. 115.

The interacting subsystems, shown in figure 7 includes inputs from both internal and external sources which provide the methodology to consider all aspects that influence the organisation to produce the necessary outputs of high performance. The model does not set goals or have a guiding vision, but considers the parts of the system that will need to change and the effect the change has on the other parts.

Consideration of the subsystems of 1. work (process, design, rewards etc.), 2. people (skills, characteristics), 3. structure (including systems and policies) and 4. culture (norms, values, power etc.) is important as all these areas are dependent on each other to deliver high performance through high congruence.

Figure 7- Congruence model

Figure 1: The Congruence Model



www.mindtools.com (Peters, 1984) (accessed 20/3/2018)

2.6.6 McKinseys model

This model was introduced in the 1970's as organisations became more complex and considered the coordination of the various key elements (McKinsey, 2008). McKinseys 7s model is used to analyse organisations and their effectiveness to identify what elements need to be aligned to improve performance, (Peters, 1984). It looks at the main seven elements that make organisations successful (figure 8) and can benefit organisational change through the identification of the social and psychological needs of the employee and the method of communication required for management to develop competitive advantage in performance (Singh, 2013).

The hard elements, describe the structure which identifies the relationship of authority, whilst strategy define what the organisation is trying to do, (McKinsey, 2008) to transform it from the present position to the new position described by objectives, subject to constraints of the capabilities or the potential (Ansoff, 1965). Style has been compared to culture and reflects dominant values, beliefs and norms which form organisational life and is therefore a key consideration in the implementation of any strategy (Martins, 2003).

The 3 soft elements include the skills and competencies of staff, are less tangible and more influenced by culture (Peters, 1984). This knowledge can be used to initiate the process of engaging with the environment to learn to provide an insight (Checkland, 1981). Skills include the institutional and individual skills to ensure the organisation has the necessary specialisations and considers the environment on a global scale. Skills are considered at a planning stage, which may reveal options such as outsourcing (McKinsey, 2008) or training need to be explored. The talent, diversity and number of staff in the organisation, are an important consideration in planning change, as an emphasis on hard work may positively affect staff future with the organisation and career growth as an incentive (Purcell, 2003). Systems that are the processes that support the strategy and assist the daily running of the organisation such as risk management and human resources (McKinsey, 2008), which are integral to the planning and implementation of any organisational change.

Central to all the elements are the shared values and guiding concepts around which the organisation is built. Strong values will provide clear direction to staff, whereas weak values can lead to staff following their own personal goals which may conflict with the organisations (Martins, 2003). Organisational change must therefore consider this factor as it is central to all members of the organisation.

All these elements can benefit organisational change as they assist on the analysis of the gap between the current state and the desired state, and design an intervention programme to achieve the aim (Green, 2009). The recognition that all elements are interconnected, where a change in one will affect the others, is important to consider, to guard against taking easier options in the short term which will create further issues in the long term (McKinsey, 2008).

The organisational structure in appendix 1-4, shows the hierarchical structure which aligns with the aim and objectives within the Corporate plan (NPTCBC, 2017) to deliver the Organisations strategy. These hard elements are directly influenced by management, along with “systems”, which is the aim of the systems review process of EHTS, and ‘can be engineered to achieve objectives’ (Checkland, 1981).

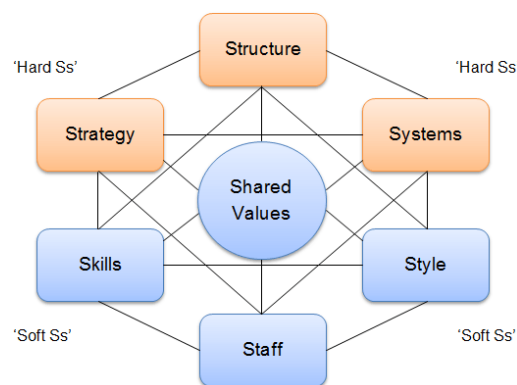


Figure 8 – McKinseys model

www.strategicmanagementinsight.com (accessed 24/4/2018)

The design of the system to incorporate these factors may be influenced by the root definition, as described by (Checkland, 1981) and the possible ways solutions to problems are conceived. The formulation of a project team to redesign the system may cause problems reconciling individuals' various views, which may allow the more powerful the opportunity to disproportionately skew outcomes in their favour (K, 2009).

2.6.7 Kubler-Ross model

The Kubler-Ross model was used (Kübler-Ross, 2014) to explain the stages of emotion staff experience through loss or grief. This model describes the 5 stages of normal feelings people experience (figure 9) when they deal with change in their life, including loss (Connelly, 2016).

Kubler-Ross described the reactions as coping mechanisms, which people move between and can become stuck on at different stages at different times (Kübler-Ross, 2014).



Figure 9 – Kubler Ross Stages

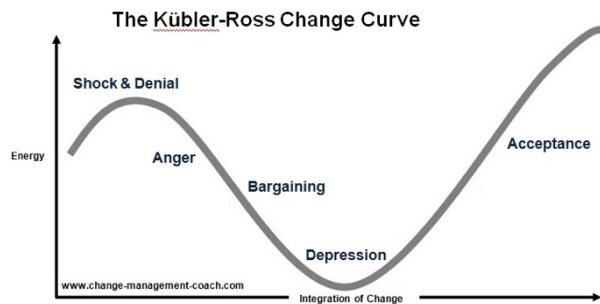
Figure 10 below, shows the Kubler-Ross change curve, which shows the stages of emotion which can be expected due to change, with the understanding that moving between stages is normal and a thread running through the stages is hope, even though Kubler-Ross does not include it as a separate stage. (Connelly, 2016).

The denial stage to a change, is a sense of disbelief and the person may become emotionally numb (Green, 2009) and deny that the change is happening. On acknowledgement of the change, anger sets in, and frustrations with people questioning the need for the proposed change and look to attack others or themselves. Stage 3, occurs when the person attempts to gain an element of control over the situation and will bargain. This could be viewed as panic, but the person is still deflecting the true gravity of the loss that is perceived as attached to the proposed change.

The depression stage follows when there is a realisation that the extent of the loss is real and happening. People respond in different ways, from sadness to apathy and pointlessness, recognition of the symptoms enables support and treatment packages to be introduced, where needed such as Counselling or peer support (Mind, 2017). The last stage of acceptance, is one

where people have to some extent come to terms with the change and loss, and are emotionally in touch with their feelings, even if they do not agree with the situation.

Figure 10 – Kubler Ross Change Curve



2.6.8 Bridges transition model

Bridges transition model (1991) in figure 11, concentrates on understanding what goes on in the transition of change rather than the change process itself with the aim of being able to manage the change process more effectively.

Bridges states that “transition is about letting go of the past and taking up new ways of thinking or behaviours” (Green, 2009) pg118

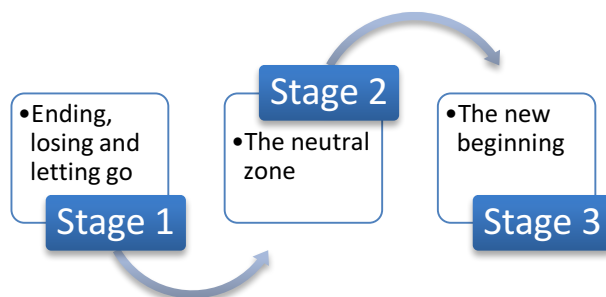


Figure 11 – Bridge model

The model starts with a recognition that to start something new, there must be an end to what was in place. This is tangible and is followed by a “neutral zone” where there are psychological challenges in the form of anxiety, disorientation, motivation may be present. Positive effects may also present themselves to enable creativity and opportunity within the change, that allows the new beginning to be accepted with an element of emotional commitment.

Bridges recognises senior management detachment from every day work may impede transition, therefore the involvement in the transition stage with staff provides an emotional awareness of the affect the transition may have on staff (Bridges, 2017).

2.6.9 Thaler and Sunstein’s Nudge Theory

Thaler and Sunstein’s “Nudge” theory 2008 (Sunstein, 2008) is considered to “improve understanding and management of “ heuristic” influences on human behaviour” (Sunstein, 2008). This is important to encourage positive helpful decisions by designing choices that considers people making instinctive, emotional and subjective decisions rather than logical, rational and objective (Businessballs, 2013-14). The nudge theory encourages self-discovery through a number of sub theories such as Loss aversion or the spotlight effect (Businessballs, 2013-14) which are relevant to the findings of the service review as a strategy to address resistance and the fear of making errors).

An element of resistance identified in the anger stage of Kubler-Ross and stage 1 of Bridges model, was commented by Thaler and Sunstein, that people tend to value something more when they possess it, than if they do not and suggest that this over-valuation equates to 100% or double. People therefore tend to resist to a disproportionate degree losing something they already possess, or exchanging it for something of equal or even greater value.

Thaler and Sunstein produced a toolkit to support the use of nudges in the organisation, the use of this toolkit is outside the scope of this thesis but should be considered in the implementation of the change process.

The review produced initial resentment about the change but similar to Kubler-Ross' model, the initial stage (Denial) was short-lived and Bridges model neutral zone matches Kubler-Ross' bargaining stage which produces innovation and creativity to achieve solutions and try new ways of working.

Recognition of the interaction of this stage resulted in progress presentations to the Head of Service, that enabled people to experience quick wins and remind staff of their contribution to the success of change.

A Direct approach openly acknowledging change and assessing the current culture and identifying what a new culture should look like can be adopted in stage 1 and communicated to key stakeholders in the process (Kubler-Ross, 2014). New processes can be introduced that also shift cultural norms such as "agile working" that can indirectly affect culture.

2.7 Summary

This chapter has examined the theoretical evidence associated with change management, which informed the external and internal factors that affect a public-sector organisation such as a Local Authority, and specifically the public protection service delivering the food and feed enforcement duties within the current environment. The uncertainty and change in the international, national and regional environment is unprecedented with Brexit and WG's public-sector reforms. Austerity measures and local restructures, have created an internal

environment whereby change has become the norm, whilst the provision of a Food safety enforcement service is part of a larger National agenda of reform by the FSA.

The readiness for change was gauged by using Lewins' force-field analysis, this presented a number of driving forces such as unclear roles and responsibilities, to be built on and identified resisting forces to be reduced or removed (unqualified officers) to aid the change process. The case studies demonstrated difficulties in successful inclusiveness, however there is strong evidence that the engagement and consultation of staff during the change process is critical to any success.

Kotters 8 stage change process provided the template to enact the change having consideration to the emotional transition of those involved and the Kubler –Ross cycle, that informs on the emotional cycle people experience when confronted with a grief or loss, and the Thaler and Sunsteins "Nudge" theory to influence positive decisions throughout the process.

The next chapter will consider the methodological approaches most appropriately suited to this research.

Chapter 3 - Methodology

3.1 Aim of study

This research will concentrate on the case study within EHTS service. the case study is specific after considering the research of Yin (Yin, 1994), which highlights concerns of timing and scope. Flyvberg (2011), highlighted the need to clearly define the boundaries of the study to aid the success of the research project.

To this aim, the research is introduced to determine the merits of a new way of working, through a systematic, methodical review of current systems of work within the parameters of professional qualifications and expertise of EHO's and TSO's and whilst aligning with the strategic aims of the organisation and considering the political / economic climate the service operates within.

The need to review the operational change to align with the strategic aims of the organisation to meet the requirements of its stakeholders requires a number of methods of research to gather specific knowledge for a specific problem in a specific situation (Cohen, 1994). An exploratory study to establish the relationship between the functions will be undertaken (Saunders, (2012)) which may direct the research into a more evaluative study that assesses performance and seeks explanations on the observations identified at the exploratory stage. Figure 13 shows the steps that need to be considered at this stage, starting with collection and analysis of qualitative data to explore the research question leading to an examination of identified variables though quantitative data, and an interpretation of both qualitative and quantitative findings to draw a conclusion (Sage, 2017).

3.2 Research Methodology

Saunders et al, (2012) developed a research procedure that considers data collection and research methods, which was named “the research onion” (figure 12 below). Tosey, 2012/13 explains that the outer layers of the onion provide the context and boundaries which determine data collection techniques and analysis procedures, as these layers are crucial to the development of a justifiable and coherent research design. The inter relationships between the layers of research will be considered on their practicality, ethical importance and equal weight will be given to each layer (Bell, 2010).

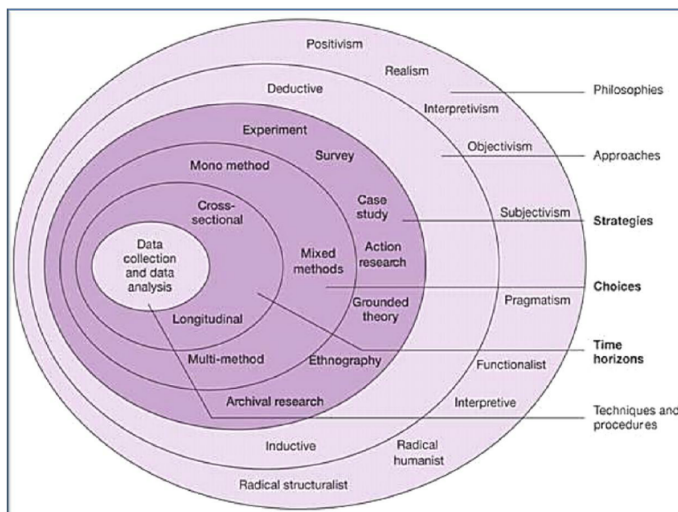


Figure 12 – The Research Onion

(Saunders, (2012))

3.3 Research philosophy

The Research philosophy is important as it shapes the questions, methods of collection and the interpretation of findings (Crotty, 1998). A multi-dimensional set of continua was considered as advocated by (Niglas, 2010), however the researcher deemed it unrealistic to consider each position on the continua. For the purpose of this research, it is envisaged that a pragmatism

philosophy would be appropriate as it associates scientific enquiry, that uses a number of data collection techniques and analysis procedures that support subsequent actions (Tosey, 2012/13). This philosophy recognises that there may-be multiple realities and no single point of view can ever give the entire picture (Saunders, (2012), and concepts, are only relevant if they support action (Kelemen, 2008).

The case study involves an evaluation of how the service interacts with a large number of customers. This can be supported by phenomenology, to understand how humans make sense of the world (Saunders, 2012). This branch of the interpretivism philosophy, will provide a valuable insight into the need and demand of the service and the effect of organisational behaviour within the research question.

An element of the positivism philosophy is relevant to this research based on engagement with practical and observable realities, to make scientifically robust assumptions and conclusions (Gill, 2010), a drawback is the absence of quantifiable observations within the research question. The realism philosophy was considered with the view on critical realism due to professional bias, experiences and training that may be present within the research team that could influence understanding though individual social conditioning (Dobson, 2002).

An understanding of the ontology of the research philosophy highlights issues that may exist on assumptions made by the researcher (Saunders, 2012). The development of a project team to formulate the research strategy and questions will balance any bias to a certain effect, however the team are drawn from the same working environment and similar Professional bodies, therefore care must be taken to identify and address preconceived perceptions or reflexivity that could influence the research (Berger, 2003).

For the purpose of the research, the hierarchical structure of management that would have created an objectivism environment was put aside, and all members of the task group encouraged to speak freely and contribute actively at all levels (Frank, 1990). The researcher led the group with assistance from the independent facilitator to ensure the research question was central to the focus of the group. An element of objectivism was therefore unavoidable and present to enable the flow of information at all levels of the service to be gathered and analysed.

The research on the interaction of the EHTS service with each other and its customers must consider the different relationships and perceptions, each party holds. Consideration of this subjectivism assist in understanding motives, actions and intentions in a meaningful way (Saunders, 2012). (Millmore, 2007) describes this culture as a process of continuing social enactment, which recognises the Organisations complex environment.

3.4 Research Approach

The second layer of the research onion, leads us to consider the approach. Due to the number of unknown variables within the case study, an inductive approach is considered along with an abductive approach. Deductive reasoning was discarded as any change in service delivery will change the system and method, therefore it is impossible to deduce a conclusion only judge observations to support it (Ketokivi, 2010).

Abductive reasoning is considered most appropriate, as it combines both deductive and inductive approaches (Suddaby, 2006) by observing the surprising fact (Ketokivi, 2010) that “multiple officers visit the same business to perform similar functions”. This provides a series

of premises for testing, that if proved, would be sufficient to generate a conclusion and enable a more informed decision- making process regarding research design (Easterby - Smith, 2008).

3.5 Research Design

A mixed-methods simple research design (figure 13) is deemed appropriate for this research to use both quantitative techniques and qualitative. This fixed method design to use both methods in a predetermined system may also introduce other forms of data collection as they emerge through the course of the research (Morse, 2009). A dynamic approach based on multiple components of the research design is considered based on research by (Maxwell, 2003) which introduced an interactive-systems based approach to the design, with the research question at the heart of the process and components relationships considered throughout. The interaction between the strands of the qualitative and quantitative elements of the research will be tested as they are thought to be close due to the nature of the service, however the conduct of one strand may depend on the results of the other (www.sagepub.com, accessed 27/12/2017). A strand of research into staff competencies and training may influence the direction of research, that will require consideration within the framework of the project.

(Maxwell, 2003) advocated 5 interconnected components, which will constantly be referred to during the research process, these are: -

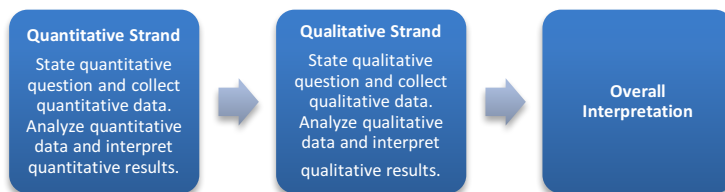
- 1.the study's purposes,
- 2 conceptual frameworks,
3. research questions,

4. methods, and

5. validity considerations.

Both qualitative and quantitative have their strengths and weaknesses (Kumar, 2014), with “neither one marked out as superior to the other in all aspects” (Hughes, 1992). Ethnography will be used within the qualitative element to study the interaction between groups in work and the organisation. The combination of data will be used to ascertain whether the findings of each method corroborate each other in an attempt to achieve triangulation (Saunders, 2012).

Figure 13 - Quantitative and Qualitative Strands in a Mixed Methods Study



www.sagepub.com accessed 28/12/2017

By using different interviews from different sources, e.g. staff will produce some data resources. Questionnaires will be undertaken by 3 distinct groups, which once analysed will confirm the need for the study aim, which will demonstrate whether triangulation has occurred.

3.6 Data sources

As discussed above, the research will involve qualitative and quantitative methods of research. Qualitative data will include interviews, questionnaires and observations from stakeholders to gather unquantifiable information such as personal and professional views and opinions on the research question and collect in-depth, open ended information from variety of identified sources (Berger, 2003).

The shared flare IT database for the service can will be a major source of quantitative data as it is the main reporting system on the level of service demand, enforcement performance and could lead to segmentation of different businesses based on type, size, specialism, national / international/ local customer base.

Primary data will be gathered from the interviews, questionnaires and newly designed IT reports specific to the research question. This data does not currently exist therefore care must be taken on how questions are formulated and interviews are conducted, to avoid bias and inconclusive data, that would compromise the research. The research group will consist of interviewees from front line operational EHTS staff, these will involve 4 members of the team, questionnaires will be circulated to approximately 100 service users.

Secondary data from published professional journals, national performance indicators and industry guidelines, which is currently available from a number of sources, will be used to inform the direction of research and be considered within the cyclical process.

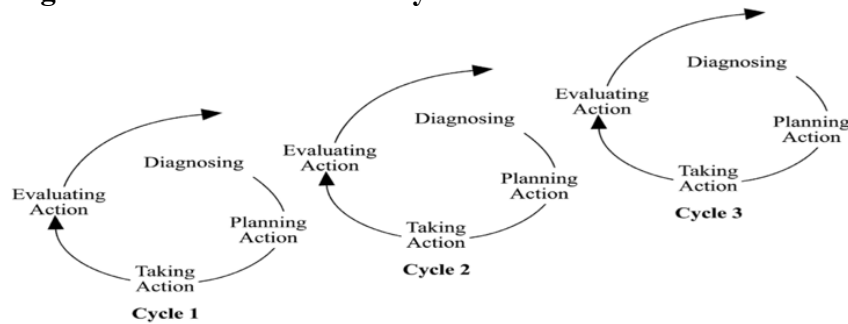
The case study will include research on other organisations that have merged the food safety functions of Environmental Health and Trading Standards, however caution must be given to generalising that functions performed by the respective services are comparable and not influenced by additional or different functions or priorities. (Denscombe, 2007). Due to austerity cuts, local authorities have had to make difficult decisions on the service cuts based on local democratic decisions, therefore the makeup of the professional services has altered based on local priorities (CIPFA, 2003).

3.6 Research Strategies

The strategies layer of the onion, emphasises that more than one strategy can be used in the research design. A number of strategies are required to gather data, which include Action research (working with practitioners to bring about organisational change i.e. current member of the new business team), case study will be used to research benchmarking with other authorities, and survey to gather views of stakeholders.

Action research is therefore appropriate to progress the discussion on the operational (Reason 2006) and strategic change (Shani & Pasmore, 1985) required. as research develops. The emergent and iterative process of theoretical sampling, testing emerging insights to produce additional theoretical insights (Hayes, 2000) builds up data within the process that directs research. The process shown in figure 14 below, shows cyclical planning, evaluation, diagnosing to explore and evaluate solutions to inform change to organisational issues. This adheres to the interactive multiphase mixed method research design to evaluate data from the qualitative and quantitative research methods.

Figure 14 – Action research cycles



Cycle 1 = Testing out issues

Greenwood and Levin (2007)

Cycle 2 = Understanding the customer and project

Cycle 3 = Acting on knowledge

Greenwood and Levin (2007) emphasise action research is a social process which requires a high degree of participation between the researcher and organisational members, to promote collaboration and encourage participants to act as co-researchers. A task and finish group to undertake the research is intended which will be led by the researcher and facilitated by an independent co- researcher with no working knowledge of the Environmental Health or Trading Standards services, the role will be to advise and steer the process.

Participation in the group will therefore be an important decision (Young, 2001). To ensure a collaborative approach is adopted, representatives from the EHTS service should be identified as early as possible and possess skills to be able to impart propositional, experimental and practical (everyday working) knowledge to the process. Members were also chosen who had an attitude of experimentation, to develop a creative team that is open to new possibilities, alert to new directions and propose new solutions (Brown, 2009).

The following mantra by the American chemist Linus Pauling was adopted:

“The way to get good ideas is to get lots of ideas and throw away the bad ones”

(Bridges, 2003) pg. 51

All members will have an open and /or hidden agenda concerning the expectations of the research project (Young, 2001), as any change will directly affect them. The expectation of the research must therefore be clarified within the research brief to understand the position of members of the group at the outset, to address negative hindrances within the team, as the protection of self-interest is a natural human behaviour (Young, 2001).

A study of existing working practices and experiences will be carried out by members of the group, which may encourage change from the bottom up (Reason, 2006), which Schein (1999) states would increase the likelihood of any change being embraced.

A period of divergent thinking is required to multiply options and create choices rather than the more practical convergent thinking which analyses inputs to converge on a single answer (Brown, 2009) pg. 66

An independent facilitator with no working knowledge or involvement in the service will be considered to guide the process and aid evaluation and the diagnostic stages. Barriers to change for professional individuals were identified from research by Cabana et al on a professional perception model. This identified that a lack of awareness, lack of familiarity, lack of self-efficacy, lack of motivation, low expectancy of favourable outcome and perceived external barriers beyond the control of individuals, were barriers to adopting the guidelines (Richard

Grol, 2004). A strategy to manage change is discussed in chapter 4, based on Kotter's 8 step model to address these barriers (Kotter, 2002)

3.7 Reliability of data

Reliability of the data collection and analysis procedure and techniques will be ensured by considering documented threats such as participant and researcher bias and error (Saunders, (2012). The quality of the research will also depend on robust validation techniques to ensure we actually measure what we intend to assess (construct validity) and internal validity to the explanatory study of quantitative research such as the use of questionnaires. The researcher will consider threats to validation as described by Cook and Campbell (1979), such as testing the views of participants, past or recent events, maturation and mortality of the participants, any change in the use of research instrumentation throughout the different stages of research and any lack of clarity of the cause and effect of the research.

Consideration will be given to the level of resources to the research in terms of time and budget. The research has approval at Directorate level (Williams, 2018) as any resource implications will impact on service delivery and the team performance in the short term. However, the aim of the research is to identify operational and strategic benefits for the organisation in the longer term, which bring efficiency and monetary savings.

3.8 Pilot Study

A Pilot study will be undertaken to identify any problems with the questionnaires before circulating to the main sample, and will caution the researcher to items that could lead to the

failure of the project. The advantages of using the pilot is to establish whether the questionnaires are clear or ambiguous, covered the main topics, objectionable and whether the layout was clear and attractive (Hundley, 2001). The length of time the questionnaire took to complete could also be determined, which influences the overall effectiveness of the questionnaire (Hundley, 2001).

The number of subjects to sample is a complex issue as asserted by (Collis, 2003), with the appropriate number dependant on how accurate the researcher wants the result and how confident is the answer.

The pilot interviews will be undertaken with 10% of population of staff, the pilot questionnaires will be distributed to 3-5 service users of each category (members, businesses, and service users).

3.9 Access of information and ethics

The case study under research enables the researcher to gain access to information and appropriate potential interviewees through existing contacts and professional working groups / panels, for example Welsh Heads of Environmental Health expert panel or the All Wales Food safety expert panel. Access via these avenues is less likely to encounter resistance, if known associates and friends are involved (Easterby Smith et al. 2008).

Consideration of the ethics of the research approach will be undertaken to ensure professional standards are maintained and issues of privacy, confidentiality of data, safety of researcher, and the management of data are addressed. The identification of ethical issues at all stages of

the research will determine the research method used at that stage. A consent form will be used where confidential, sensitive or personal data is held, this will also enable data protection legislation to be complied. Any refusal of involvement will not be pursued (Robson, 2011), and care must be taken to ensure no undue pressure is put on the potential participant as this will have a negative impact on the research as a whole.

3.10 Time Horizon

It is envisaged that a cross sectional snap shot time horizon is adopted to make use of the survey and case study strategies, however there will be an element of a longitudinal time line to research archival information

3.11 Development of Questionnaires

The questions were developed with the focus on the customer to determine “waste” and “value”. Vargo and Lusch, (2004) stated that the customer is always a co-creator of value, and there is no value until an offering is used - experience and perception are essential to value determination.

The questionnaires were structured with the content and possible sequences of the questions determined in advance compiled having consideration to the Likert scale to questions that required a unidimensional method, whereby labels were used to describe scales and questions were asked to gather a response rather than gaining agreement or not (Anon., 2018).

The focus was defined by the team in a (Maxwell, 2003) brainstorming session, and centred around knowledge of the overall EHTS service and specifically any involvement with the Food

safety and Trading standards functions. The team considered using the Thurstone method of scaling, but discarded it due to the reliance on statements which, the researcher felt did not encourage opinion to be expressed on the service. Guttman scaling was also discarded due to the cumulative nature of this method which the researcher felt was not appropriate for this research.

The pilot questionnaire to senior officers and members developed the questionnaire, to remove labels in questions that required a 5-point scale from very good to very poor, to a 10-point scale from 1 to 10, with a supplementary question asking to advise on what would be required to obtain a 10.

3.12 Effectiveness of pilot study

The pilot was very effective, and led to the amendment of the questionnaires to resolve issues of clarity, and reduce the length of time taken to complete. An unexpected parameter was identified in the consumer pilot which involved members of the research team asking questions face to face. This highlighted a bias within the feedback towards the particular profession of the interviewer i.e. Trading Standards or Environmental Health when ranking functions in terms of importance. This could be explained by the different levels of knowledge of all the functions, therefore a more detailed, knowledgeable explanation of their own functions is expected.

It was therefore decided that independent interviewers would carry out the face to face interviews of the consumers.

The members questionnaire (appendix 10) was also amended to be more focussed on the food safety function, as the pilot informed the research that members had a good understanding of the service generally but not the specific details of the individual functions when asked whether Environmental Health or Trading Standards were the responsible team. The Members questionnaire was amended to remove unnecessary information requested from the responder such as Ward and age, to reduce the burden on the responder and focus on the information required from the survey (appendix 11).

Feedback on the pilot questionnaire was positive and confirmed that members were knowledgeable on the services provided but not the detail such as frequency of inspection and the different interventions available. The questions in the final questionnaire can therefore be designed having consideration to this high base line knowledge, and more searching questions can be asked.

One member questionnaire was completed via email, this was valuable as it revealed a number of questions were difficult to understand without explanation, such as the grading of the food services provided. In response to this finding, the project team decided to undertake all member questionnaires in person, preferably face to face or by phone (Williams, 2018).

Feedback received from consumers was overall positive, but highlighted a structural issue on the format of the form which contributed to irrelevant questions being asked on the service. This was addressed for the final questionnaire, which improved the flow of the questions and shortened the length of time taken to complete.

The main negative item of feedback on the consumer questionnaire was the length of time taken to complete the form when a lot of the questions were not relevant if the responder had not used the service.

The business questionnaire was trialled in 3 businesses that had used the food hygiene and food standards service in the last 2 years. This was undertaken by face to face interviews with the manager (x2) and supervisor. The initial difficulty identified was interviewing the right person due to shift patterns and business opening times.

All businesses remarked that the question that required them to rank the food services was very difficult, as they are all perceived as important. Consideration of an alternative method of information collection should be considered by the project team.

3.13 Data Collection

The time line for the data collection and analysis can be found in the Gant chart (appendix 12). During the 3 week period of data collection conducted on consumers, local businesses and NPTCBC Councilors, between 19th February 2018 and 10th March 2018, the study gathered 22 employee respondents provided information via interviews to compile data in specific questionnaire (appendix 13), 58 consumer interviews carried out face to face, 35 of which had not used the service before and 23 had used either the Trading Standards or Environmental Health service within the last 2 years. 42 businesses owners were interviewed who had received either a Trading Standards or EH programmed inspection or been subject to an inspection due to a complaint.

The project team agreed that NPT Councilors should be interviewed face to face, and only where this proved practically difficult, should the interview take place over the phone, 31 Councilors were interviewed in total.

The questions survey and the interview were very similar with only a few variations where specific information could be gathered from the respondent e.g. businesses were asked their view on the length of time inspections took in their premise.

3.14 Data Analysis

The researcher is the lead officer of the project team for data collection for this dissertation. The literature review was critically analysed, to identify key theories and stakeholders and external and internal factors that effect and influence the service. The review also highlighted the relevant change models and the Vanguard system review process on the operational change process.

Through thorough thought of time restraints, the researcher has chosen an analysing multi-methods framework by (Creswel & Clark, 2007, p. 129).

Using the advantages of the large snowball sampling, high ranges of relevant characteristics relationships can be identified. For instance, establishments of meaningful variations at the same time determine the diversity and characteristics of the sample population (Jansen, 2010). However, the researcher has had to be mindful, the weakness to the surveys is that there is no way to tell how truthful the respondents are being; therefore, no surveys were looked at individually (Saunders et al, 2016).

The interviews use a cataloguing technique during the analysis process using a method defined by (Knight, 2016). When the researcher identified a theme or trend, either relating to the

literature review or fresh information a colour code was applied and recorded within the produced index. Due to the nature of questions, some answers were short and not explained by interviewees thoroughly, although there is enough data gathered to overcome this weakness.

Themes identified from the literature review are a large portion of what the researcher has to identify within the data analysis process of both surveys methods. To highlight similarities presented within the relevant theory, the researcher has had to read and analyze the online statistical software categorizing of the data and the interview transcripts many times. Comparisons and differences to the related theory are of obvious importance, however the researcher remained vigilant to identify any fresh perspectives that may be identified (Cottrell, 2011).

The summaries of the data are to follow and a discussion linking the data to the literature review in the next chapter.

Chapter 4 – Analysis

The main purpose of this chapter is to explain the data analyzing process used and present the data that forms the basis of the researcher's investigation, through interpreting the patterns and associations found in the results.

4.1 Lewins Forcefield Analysis

Lewins' analysis (Appendix 9) indicated that the driving force for change is powerful compared to resisting forces, with a number of strong factors influencing change, such as the current failure to meet targets, increasing backlog of visits, an impending FSA visit, potential inconsistency of advice given, duplicity of Officers visiting same businesses and the ability to change within existing resources. The resisting forces are weak which aids the change process as resistance will be weakened further against a position of considerable strength. The only way for the organisation to move from its current state to the desired state is to weaken the restraining forces and utilise the driving forces (Hayes, 2007).

The transforming idea to transfer a number of food related enforcement duties from the Trading Standards Officers to Environmental Health Officers addressed the concerns identified, however to understand the strength of the change and whether it had a positive effect, Lewins force field (1951) analysis (appendix 9) was used to identify and evaluate the influence of the driving and resisting forces to move the service from its current state to the desired state (Lewin, 1951).

An important factor identified that the financial cost of the change could be absorbed into existing resources. Any financial cost in the current economic climate would have presented a considerable hurdle to overcome.

4.2 Stakeholder mapping and analysis

Internal and external stakeholders that influence the food safety and Trading Standards service were mapped in figure 15)



Figure 15 – Stakeholder map

The Stake holder analysis in figure 16 below determined the level of interaction required with the stakeholders. An understanding of these key stakeholders was considered in the research methodology to determine the best way to engage and communicate with them (Thompson, 2018).



Figure 16 – Stakeholder analysis

WG and the FSA have high interest and power at national policy level, as local authority functions and priorities and access to funding lies with these organisations. Any structural or strategic change needs to consider the framework agreement with the FSA and WG priorities.

Members were identified as having the most power as the strategic decision makers and allocation of resources for the provision of services within the Authority, whereas business interest was high due to the importance of public safety and the high profile of the Food Hygiene Rating scheme that promote the standard of hygiene in the businesses.

4.3 Consumers Questionnaires

This section explains the consumers questionnaire data which has been processed and summarised. A copy of the original survey can be seen in appendix 14

Chart 1

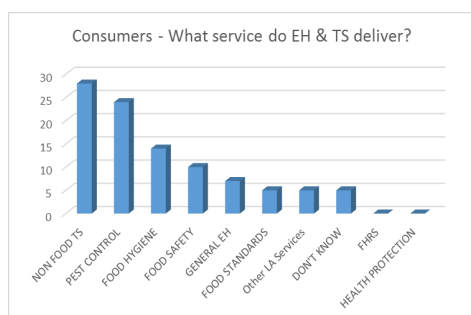
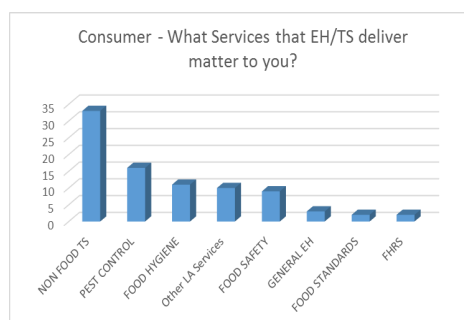


Chart 2.



The service most respondents were aware of was non-food services provided by Trading Standards including faulty goods and rogue traders. This may be obscured by a number of respondents being present at a Womens Institute meeting which promoted scams.

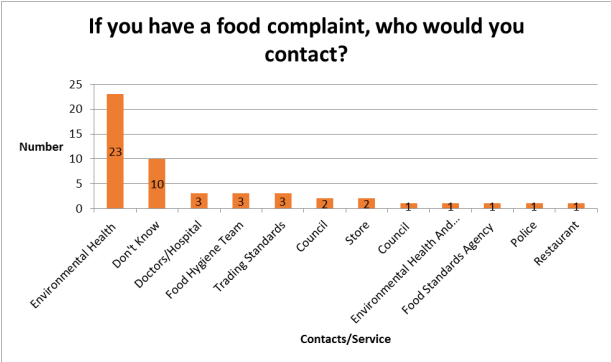
Pest Control and waste enforcement including collections proved the second greatest, even though this service had not been delivered by EHTS since 2014. Consumer perception appears that the services traditionally proved by EH are still associated with the service despite promotional initiatives to the contrary.

The above graph shows that respondents more aware of FH than FS although no-one mentioned the FHR scheme, (14 specifically FH and 5 FS).

The area that matters the most is Non-Food TS services such as scams; faulty goods; rogue traders (38%), which may be influenced by the collection of data (mentioned above).

28% of consumers stated that food related services were what mattered, whilst 17% stated pest control, waste, dog fouling & refuse collections were important.

Chart 3



This question was designed to gauge the publics’ awareness of the function the EHTS provide, and identified that 45% (23 of 51) would contact Environmental Health service and a further 20% would contact the council either directly to FH and Trading Standards teams or the Council generally. A number of respondents (20%) didn’t know who to contact and 16% would either contact the business directly or another agency (Police, FSA, doctor).

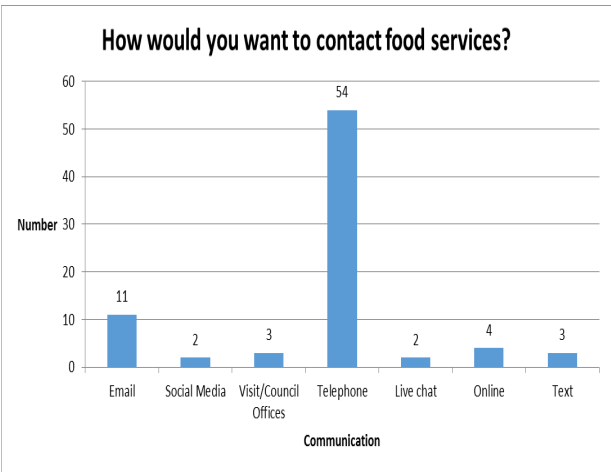


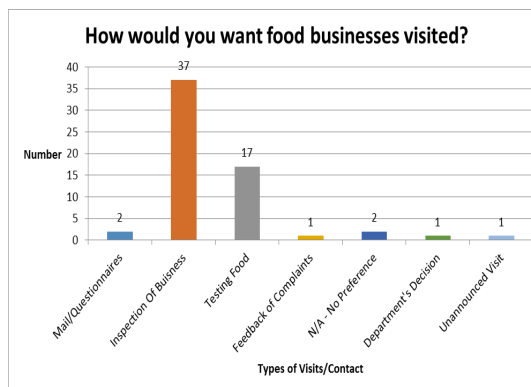
Chart 4

The majority (68%) preferred to contact the service by telephone, despite the digital by choice agenda. A low number of customers expressed a preference to digital means of communication such as email 14 % live chat (3%) and service online (5%).

Chart 5.



Chart 6



The open question to consumers was intended to gauge how the public perceived food businesses were checked and how they expected them to be checked. 85% of respondents stated that would like food businesses visited at least once a year and 17 % thought that at least once a month and 1 responded at least once a week.

Chart 6 shows that the majority of consumers would want food businesses checked by a physical inspection of the business and 17 responders considered testing of food as another method of checking businesses.

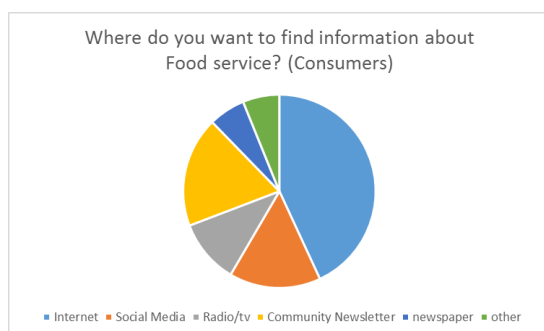


Chart 7

Chart 7 above, shows that respondents made it clear that digital sources of information were favoured, such as the Internet (48%) and Social Media (15%). Traditional methods of communication such as letters, posters at council offices were less favourable.

Chart 8

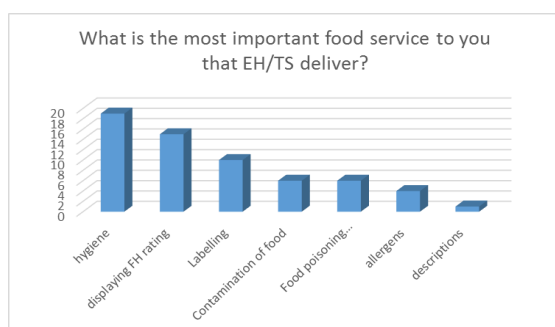
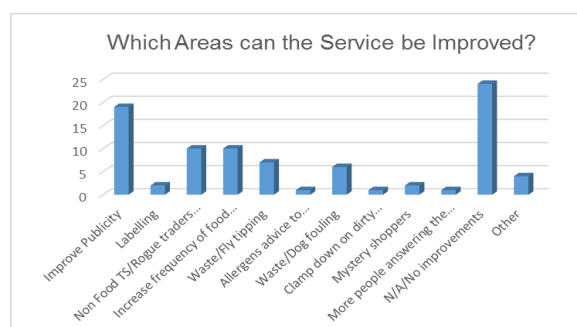


Chart 9



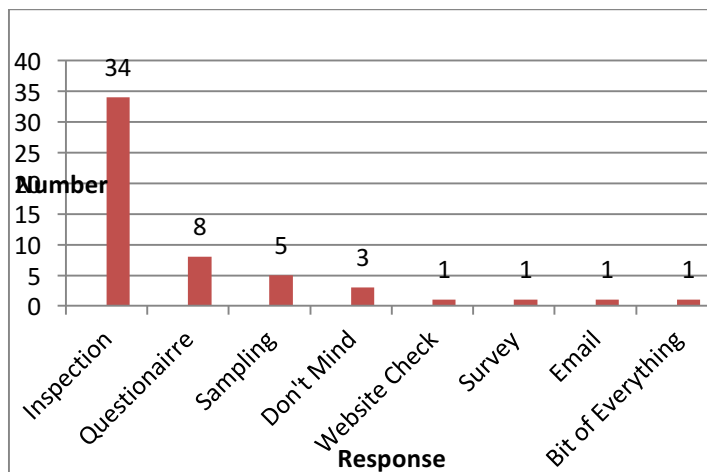
The food service that is the most important to responders is Food Hygiene (31%) followed by the Food Hygiene Rating scheme (25%). The poignant point is that 75% of responders thought that Food Hygiene services were most important and 25% Food Standards Services.

A third could not suggest an improvement to the service 24%, but the majority thought that the service should publicise themselves more.

As highlighted in the literature review, public sector change has become an ongoing process which has impacted upon the consumer and service user. Initiatives such as the Charter Mark have been created to ensure that service standards are monitored and publicised to further provide confidence in the current service and aid any future required change. However, as previously identified low engagement in the review of services delivered by public sector organisations is a continual issue.

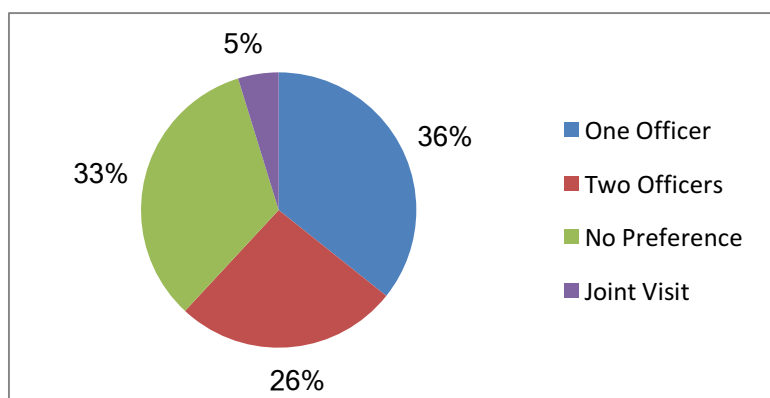
4.4 Businesses Questionnaires

Chart 1 - How would you want your business checked?



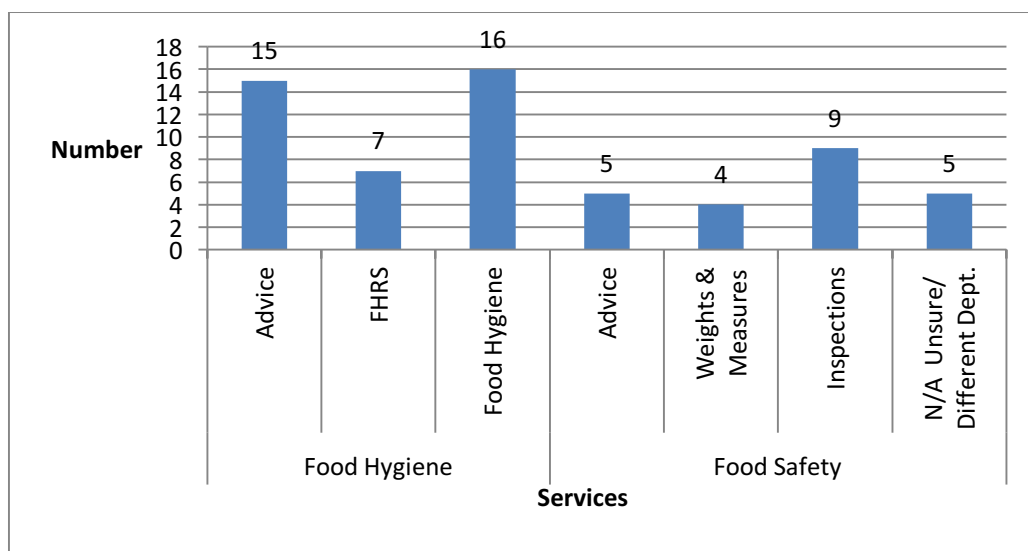
As the results indicate the preferred method of checking businesses is by physical inspection.

Chart 2- How do you want hygiene and standards visits carried out?



36% of businesses stated that they prefer one officer however concerns were raised with regards to time spent on site in order to combine visits. 33% did not have a preference but could see the logic of having one officer carry out the visit.

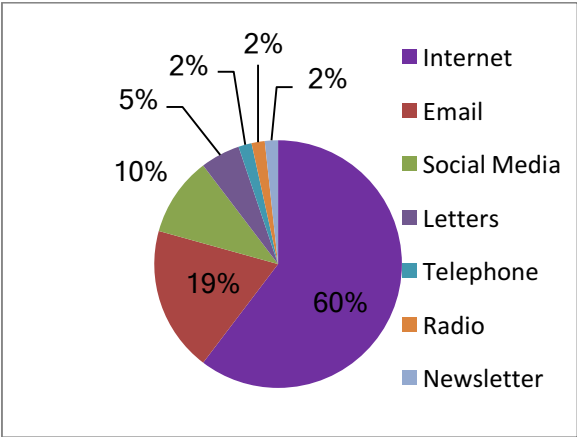
Chart 3 - What Services that EH&TS deliver matter to you?



The services that mattered most was food hygiene and business advice. E.g. new

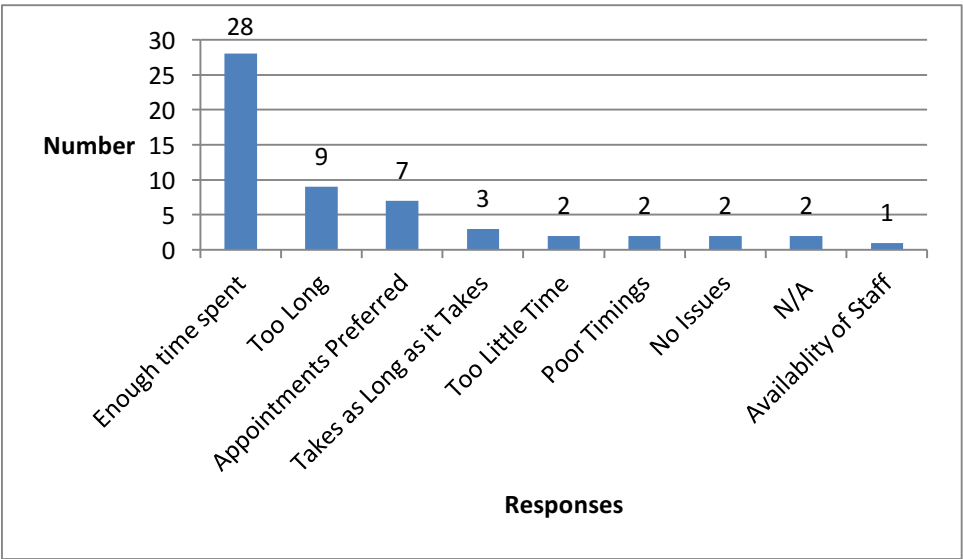
legislation/guidance. Despite a number of advertising campaigns, 5 responses indicated a service that is not delivered by EH/TS e.g. waste enforcement which has been enforced by a separate department for approx. 10 years.

Chart 4 - Where do you want to find information about EHTS services?



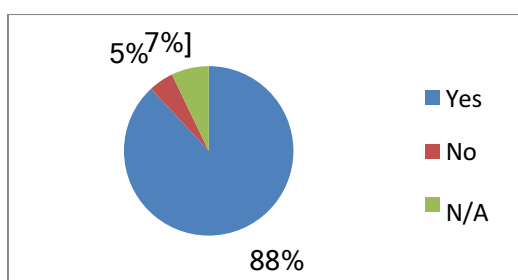
It is clear that the internet is the preferred method of finding information on the service, which follows the digital by choice agenda promoted by the organisation.

Chart 5 - What do you think of the length of time hygiene and standards inspections take?



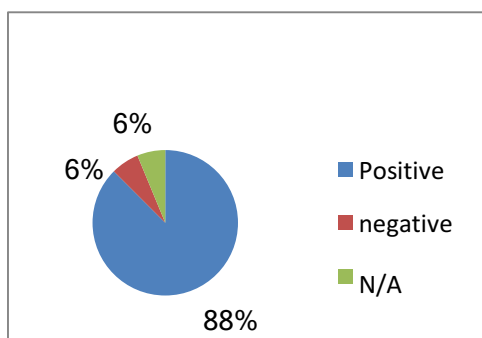
Out of the two services, the general opinion was EH visits were too long, which can last approximately 3 hours long compared to 30 minutes for a Trading Standards intervention.

Chart 6 - Do FS & FH check your business enough?



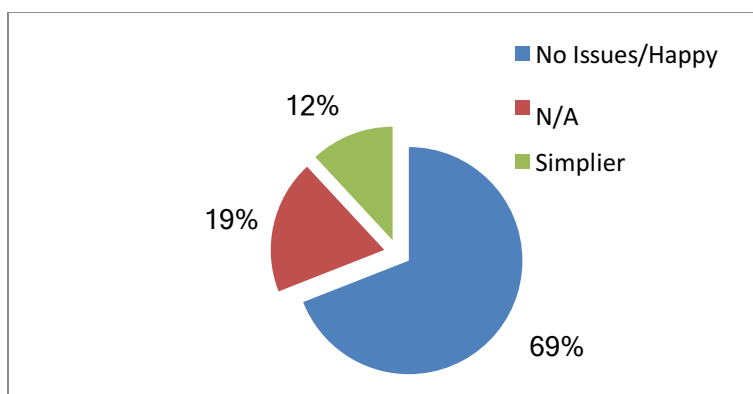
The majority of businesses commented that they were satisfied with how often they get checked by both services.

Chart 7 - Pie chart- positive / negative responses to EHTS service provided



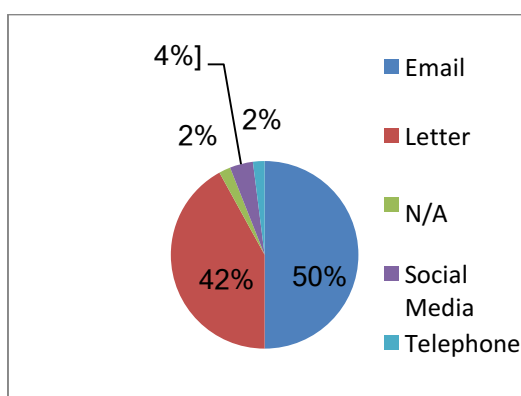
The overwhelming majority of businesses stated that they had received a positive experience with the advice given by both sections on site. Examples of negative feedback include, inconsistencies between officers and Local Authority approaches.

Chart 8 - Are you happy with the advice given?



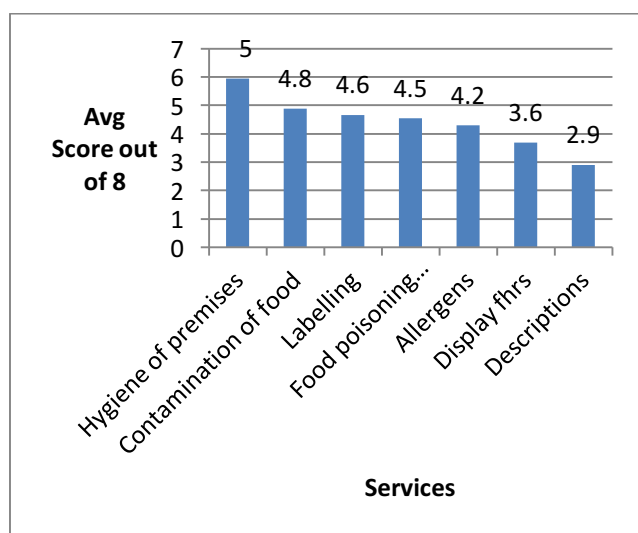
69% of the businesses responded that they were happy with the service they received. 19% answered N/A, this may be as no further advice was needed after the visit and 12% stated that advice could be improved by simplified letters e.g. less jargon, shorter letters, appeal process explained.

Chart 9 - How would you like EHTS to communicate with you?



50% of businesses would prefer communication via email, whilst 42% preferred the current method of a letter. The remaining 8% preferred other methods

Chart 10 - Food subjects in order of importance



A number of businesses felt that all subjects are equally important and had difficulty prioritising one specific area. The most important food subject was hygiene of premises. The least important food subject was descriptions.

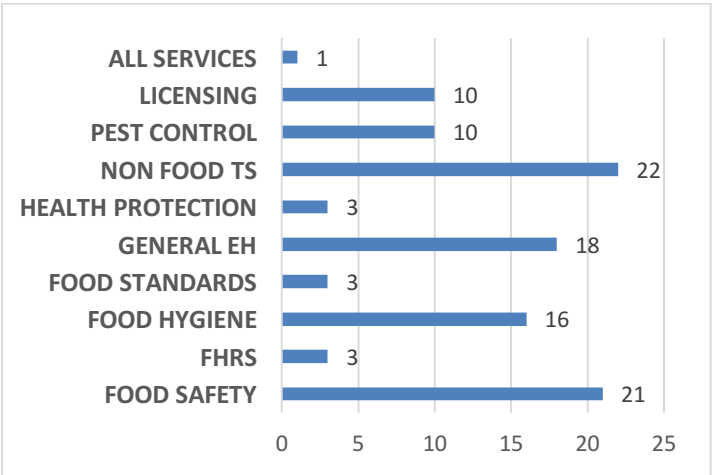
The services of greatest priority were identified as The Food Hygiene Rating score, this indicates the profile and is the customer facing rating of quality that is promoted by the Authority and the FSA. Businesses considered new legislation and guidance advice as nearly equally important. Food Fraud doesn't rate as a priority for food businesses in Neath Port Talbot due to a lack of understanding.

The FSA requires EH to manage the FHRS and undertake interventions on food businesses. As the analysis has identified, local business is content with the current service and demonstrate a positive opinion on the current methods and systems in place. However, the data further identifies the general opinion that EH visits are too long. This is supported by comment in the

literature review chapter which identifies that it is due in no small part to the European legislation that pre-Brexit is currently still in operation, which dictates the process of interventions. Further, despite advertising campaigns to highlight new guidance and legislation business users still prefer a point of contact approach.

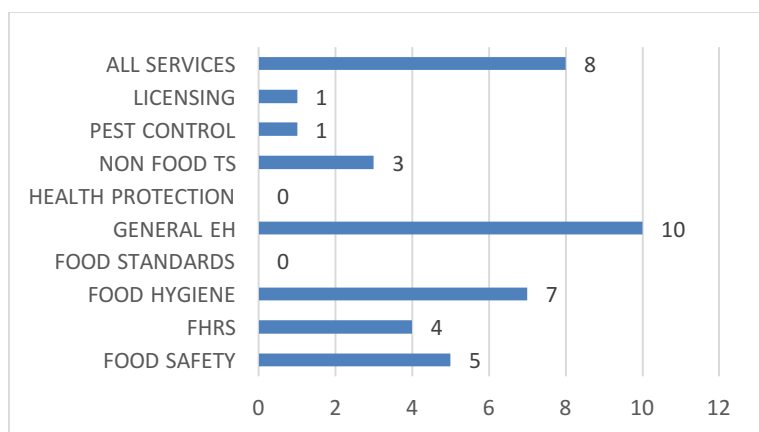
4.5 Members Questionnaires

Chart 1- What services do EHTS deliver?



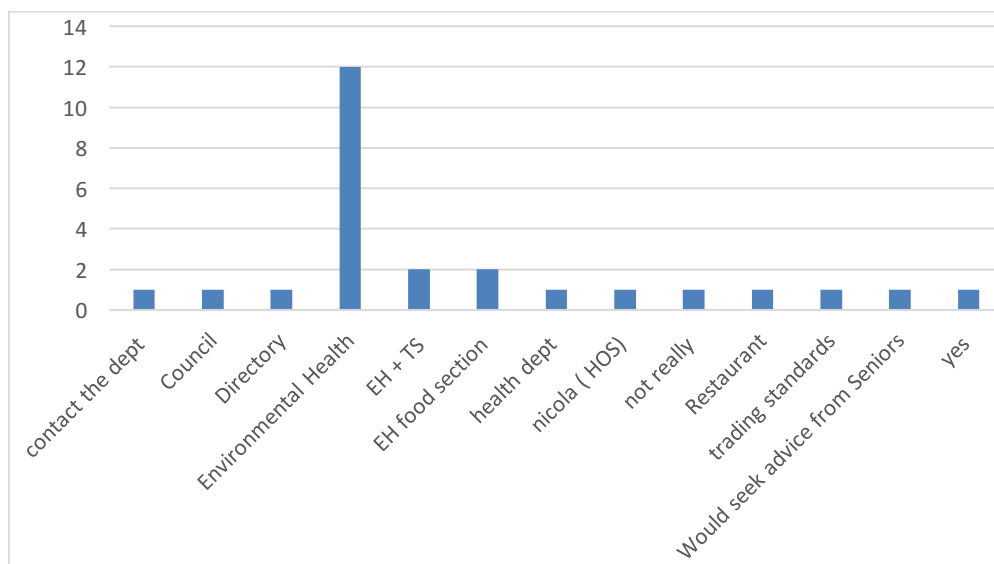
Members appear to be unaware of the services and remit of the EHTS service. Pest control hasn’t been part of the service for two years, and licensing and waste have not been part of the service for approximately 10 years. The response for food safety was significant, we have interpreted that as combining both food standards and hygiene. Food has factored significantly in the responses, but some members were unclear as to what food enforcement entailed.

Chart 2 - What services matter to you?



The services that matter mostly to members appear to be general EH, which include noise nuisance, HMO, private rented accommodation, this maybe as they receive the most direct complaints from their constituents.

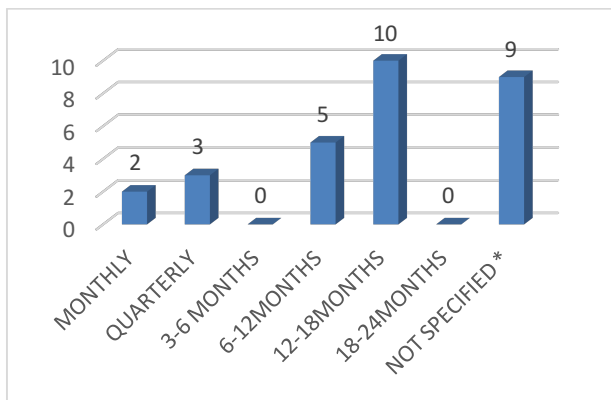
Chart 3 - Who would you contact with a food complaint?



The overwhelming majority would contact EH in respect of a food complaint. There appeared

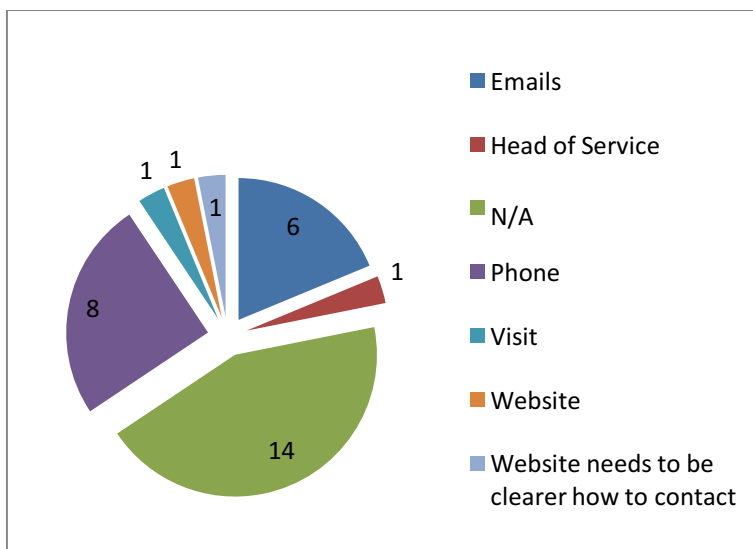
to be little awareness that TS also carry out food enforcement

Chart 4- How often would you want food businesses visited?



Members were of the opinion that food businesses should all be visited within an 18-month span.

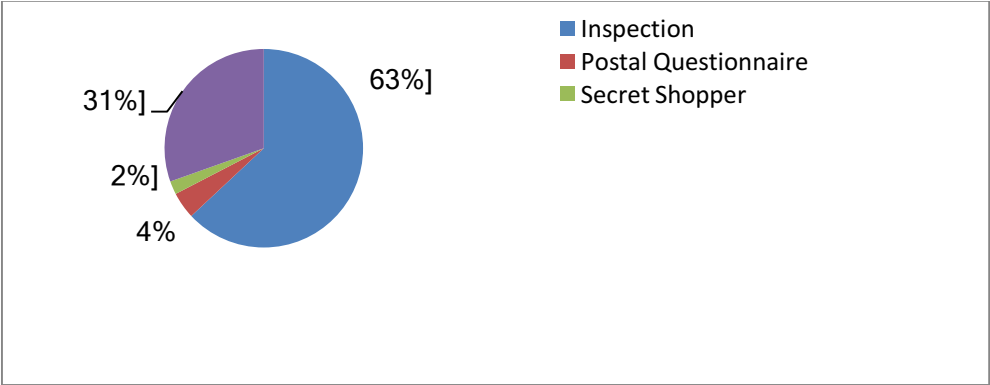
Chart 5 - How would you like to contact the Department?



The majority of the members interviewed would prefer to speak to someone over the phone

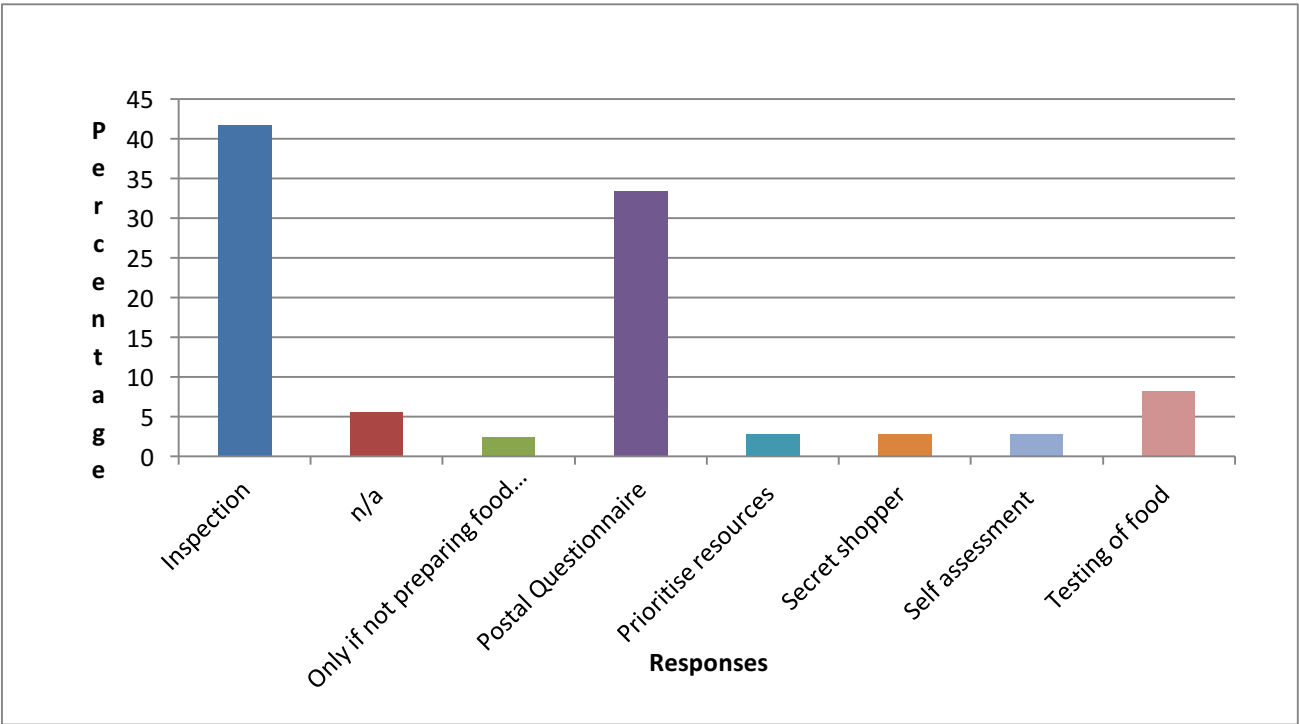
when contacting the department. Most members have had no need to contact the department

Chart 6 - How would you want high risk food businesses checked?



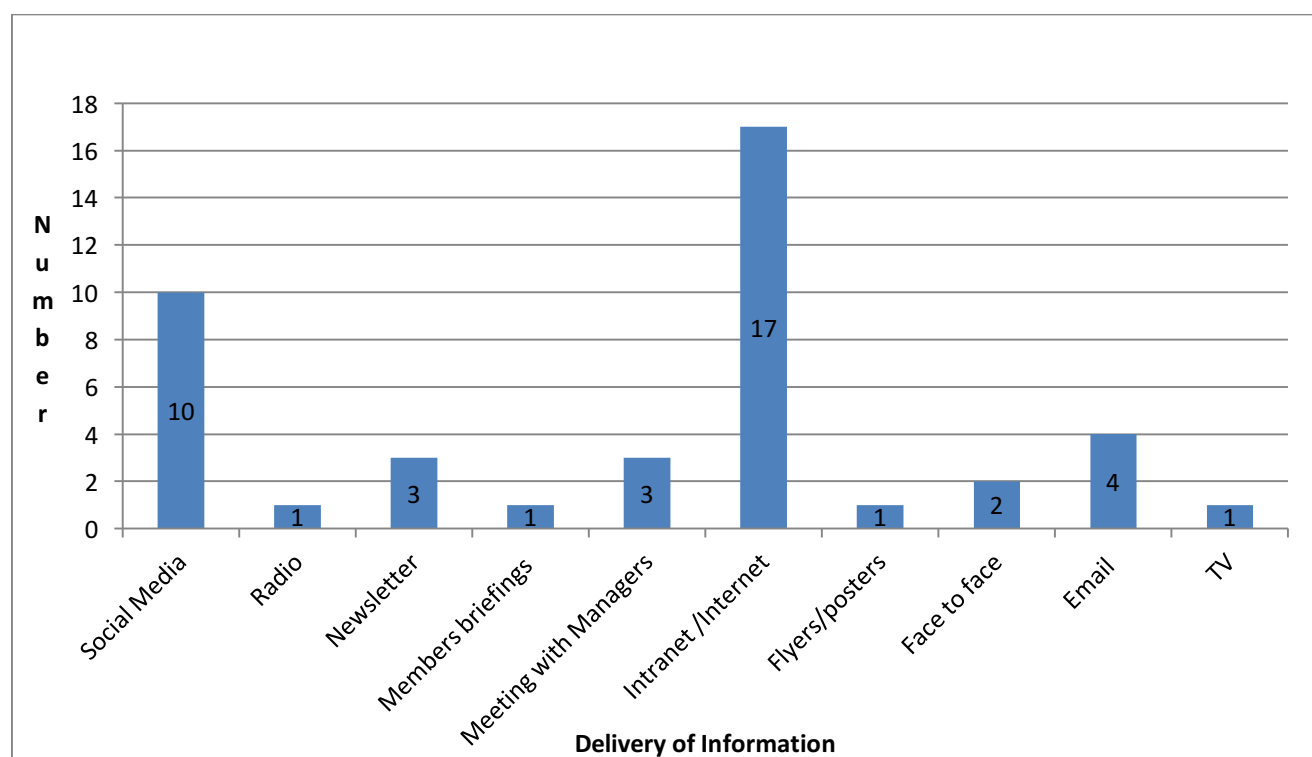
94% of members would want high risk food businesses inspected or sampled and expressed concern that such businesses might be dealt with in any other way.

Chart 7 - How would you want low risk food businesses checked?



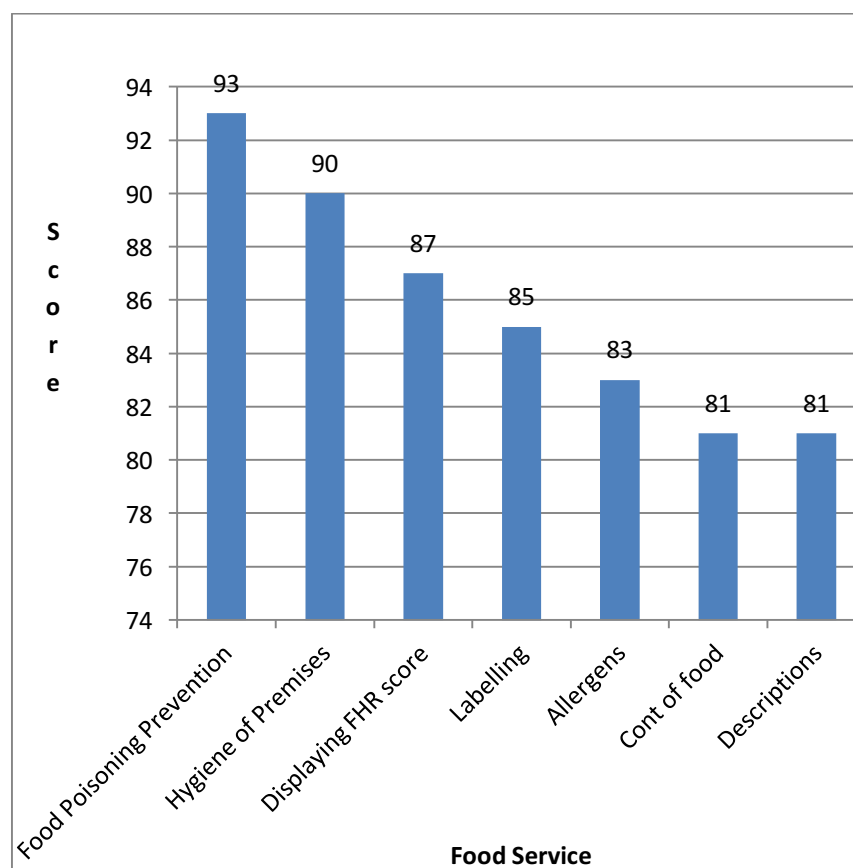
Low risk businesses - the majority of members would like the businesses inspected, however some were mindful of the shortage of resources and that high-risk businesses should be prioritised and consequently, some were open to the suggestion of using postal questionnaires. Some members were unaware that some low risk businesses, such as pharmacies) are food premises as well.

Chart 8 - How would you like to find information about the food service?



Digital media via intranet and internet was the preferred method of finding information on the service. Social media and e-mail was suggested forward updates or updates for changes to legislation. Traditional methods less so. Regular briefings via e-mail was suggested.

Chart 9 - Food Services in order of Importance



Food poisoning prevention was seen by members to be the most important aspect of the food service function, followed by the hygiene of premises and the display of the FHR score. One comment from a member was that hygiene is something that would affect all food consumers, whereas, allergens etc. would affect a minority of customers. Some members found it difficult to differentiate between each of the functions as they feel that they were all equally important and overlap.

All respondents were asked how the service could be improved. A summary of the finding was that consumers appeared to comment on general EH such as noise and other issues such as fly-

tipping, dog fouling, improve pavements (4), whilst 5% of consumers suggested that more publicity to promote the service was needed including more use of social media.

Businesses stated that there is a need to raise awareness of information such as the FHRS and appeal process and the need for the provision of training courses.

12 out of 26 members commented that more publicity was needed to raise the profile externally with the public and internally with members to raise awareness of service. Suggestions include making website clearer, communication with members and local people on local issues. There was a suggestion for members seminars and regular (monthly / quarterly e-letters).

The stakeholder analysis identified members of the authority as having quite high interest and power. This is supported by Freud (2010), which reaffirms the comments based around the services that matter, the need to have a point of contact, the requirement for the inspections of high risk businesses to be inspected and their preference to be kept up-to-date with information on the service through digital media. However, members appeared to be fully aware of the current services and remit that the EHTS service provides.

4.6 Employees Questionnaire

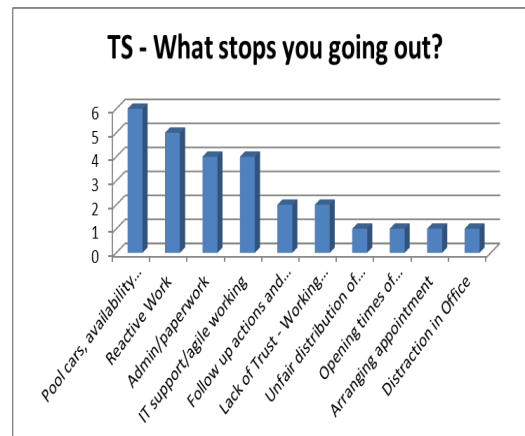
All employees of the EHTS service that provide the food safety service were interviewed by the project team to establish views on the system currently operated and what could improve efficiency and the service provided. The questionnaire in appendix 13, was used as a template. The feedback revealed a number of differences between EHTS Officers. These were mainly

due to the different roles the services perform. Barriers to work for TS mainly were difficulty in booking pool cars.

Chart 1 - Food Hygiene



Chart 2 – Trading Standards



Employees within the FH service stated that the amount of administration involved pre-and-post inspection has a considerable effect on the number of inspections that can be carried out; this is less of an issue for TS due to the different nature of the inspection.

Both services cited working from the office as a distraction and unnecessary unless assistance was required in particular circumstances or for consistency in the interpretation of guidance. The perceived lack of trust from management and lack of IT support for agile working were strong themes from employees that were barriers to working more efficiently.

These concerns are important as they are considerations that link with the transition stage of Bridges model of the emotional state of employees, with Kubler – Ross' grief model such as denial and anger.

Employees responded to the question on what improvements would make the work more effective and efficient were linked to the barriers in chart 1 and 2 with agile working policies and supporting IT systems to enable homeworking and an understanding that travelling to and from the office was inefficient that could be overcome through putting trust in employees, and office distractions demonstrated waste. The removal of certain administrative burdens as part of the system review would enhance end to end working with a leaner system and support agile working. The information from the surveys create options for quick wins as advocated by Kotters change model, such as the purchase of mobile tablets or the removal / amendment of unnecessary administration.

Chapter 5 Conclusion

5.1 Introduction

The external and internal analysis of the environment in which NPTCBC operates highlights the volatile conditions that currently exist and the history of failed change initiatives that have been implemented in the past. These initiatives have shaped the service, and together with the effect of budget cuts over the years, a number of restructures have meant a loss of staff and functions for the service. The organisation is under threat of further change with the regionalisation proposals in the WG consultation paper, whilst the food safety service is directly affected by proposals by the FSA under the RoF agenda.

Stakeholder analysis identified where the main interest and influence resided, which in turn influenced interaction with stakeholders to identify what they valued from the service and barriers to achieving a more efficient service.

The main points of the questionnaires, concluded that the current service was:

1. Highly valued but should promote itself better
2. Consumers expect inspections to be carried out, not other interventions
3. Inspections are expected of high risk businesses, questionnaires should only be used in low risk and then only intermittently
4. Prefer one inspection rather than 2 inspections by TS and FH
5. Businesses are happy with length of time inspections take, as they use the time as an opportunity to get free advice from officers

Office distractions and lack of ability to work flexibly on-site due to restricted access to pool cars and lack of mobile devices, was gleaned from the employees feedback. Administrative systems were particularly highlighted by the EH service on food hygiene inspections.

5.2 Benefits and drawbacks of the change process

1. The correct level of engagement i.e. face to face interviews or telephone questioning with stakeholders (identified by the stakeholder analysis) was important, to include the right people in the process and gather their views and up-to-date information on areas of waste that impedes performance or does not contribute to the vision, or value which assists to achievement of the aim of the review.
2. The good mix of expertise and level of officers in guiding project team enabled initial resistance to the process to be quickly overcome with positive interaction.
3. Clear message from senior management on the importance of the process enabled staff to concentrate on the process without distractions from other workload, which was a major concern at the beginning.
4. The involvement of major power / interest stakeholders identified such as WG and FSA important in the redesign process, not so much so in the change process within the scope of this research.

Drawbacks identified included:

1. The project team consisted of enforcement officers, who carried out the questioning of businesses for their opinion on the service. It is thought that the answers given by businesses may have been defensive due to the normal relationship between the business and the service.

5.3 Kotter model

The information collected through the surveys highlighted a number of quick wins which Kotter states will enable the organisation to implement the change. The issues that could be addressed include lack of mobile IT capability, lack of availability of pool cars which are expanded upon in the recommendations

5.4 Satir model and Lewin force field

Consideration was given to a number of ideas generated to cope with the chaos stage through formal and informal communication with team members and businesses; some were discarded such as re-evaluating targets or the provision of food hygiene inspections by Trading Standards Officers due to restraints within the Food CoP (FSA, 2018), such as the qualifications and training required to undertake interventions.

5.5 The congruence model

The congruence model was used in the planning stage to look at strategy, people and structure to improve performance. The researcher acknowledges that the managerial, technical, strategic and social aspects of the organisation are elements that affect the efficiency of the service; high

performance can therefore be achieved by the alignment these elements (Green, 2009), with higher performance relative to the greater degree of congruence.

Congruence of the above factors was addressed by the restructures within the service, however the rate of change in the external environment and the high influence of financial budget cuts and savings have had a negative effect on performance and level of congruence especially the social and strategic aspect of the service with the rest of the organisation, which can be partly attributed to the service being located in a satellite office, with little interaction with the support (HR, finance, IT etc.) of the organisation.

Due to the focus on budget cuts associated with organisational change, elements of the EHTS service identified as having synergies with other services e.g. pest control and dog control, were separated in the past to deliver savings which affected their congruence with the delivery of the remaining EH services. This work including process design are considered in the subsystem

Following the acknowledgement, that the Congruence model is highly relevant to public bodies, the researcher felt it appropriate to undertake a Vanguard systems review of the service, to critically assess the aspects of congruence of Nadler's model.

5.6 McKinsey model

Within the EHTS service, the EH and TS professions, have different qualifications which are stated in the Food Law COP (Food Standards Agency, 2014) that is required for staff to undertake interventions such as inspections in food businesses. An understanding of the skills

of staff and their general capabilities together with the style of leadership and its effectiveness, contribute to the organisations shared values, evidenced through the general work ethic and corporate culture.

5.7 Kubler – Ross model

The denial stage was not evident in the change process, as the guiding team was carefully chosen and tasked to join the project. This instruction came from the Head of Service and EHTS manager and emphasised the tasks importance and priority over other tasks.

The anger stage of the process was evident at an early stage and centred on:

1. being part of the process and the threat to respective professions and certain ways of working. This anger was mostly voiced from the team leader TS and senior EH and usually projected to the EHTS manager as the individual symbolising the energy of the project.

2. due to a number of time restricted projects e.g. Prosecutions, members of the project team were involved in prior to the introduction of the service review, staff expressed concern (degree of anger) and some denial of the need of the review itself, which led to a bargaining stage.

This confirms Kubler Ross' perspective that the five steps highlighted in figure 9 do not occur in the order seen. The team leader and senior quickly reached the acceptance stage of the need to the review the system, in an attempt to streamline it and the opportunity for change, but fluctuated with the bargaining stage where a threat to services or their profession was discussed.

5.8 Transition Model

The reaction of the officers in EHTS is seen in stage 1 of Bridges Transition model 1991 (Bridges, 2017) through the recognition of emotions of resistance such as fear, denial, frustration and sense of loss. The involvement of the team leader and senior in the project team

enabled an understanding of emotional state to be gauged and allowed time to communicate openly and accept the change through understanding and education of the opportunity the review presents.

Chapter 6 - Recommendations

Collaboration between EH and TS officers is recommended to enable EH staff to undertake official controls in appropriate food businesses for food hygiene and food standards. This will eliminate duplication, but the new system must be monitored and reviewed at regular intervals as analysis of business and employee questionnaires identified that food hygiene inspections currently are a lengthy and comprehensive, and these additional checks may prove too burdensome.

An acknowledgement that an end to old ways of doing things, should be undertaken, to assist with the introduction of the new systems (Bridges model).

The Kubler –Ross model should be considered to address the emotional effect felt by staff due to the loss of old system of work or work colleagues, which may occur due to changes in working patterns or re-structuring exercise.

Policies and procedures should be developed to monitor staff affected by the change process in line with the Kubler-Ross' curve model, to ensure necessary communication channels and support services such as advice, counselling and peer support are in place.

The use of trained non-enforcement staff to carry out questionnaires on businesses would be beneficial, on matters where the subject of the questionnaire is the enforcement role or body of that business.

It is recommended that the following quick wins be introduced (Kotters model-stage 6): -

1. Mobile devices that allow access to the EHTS database and organisation emails be available to all EHTS officers undertaking interventions.
2. Issue guidance to clarify the use of pool cars for officers, this guidance should include the requirement for officers to use their own transport when needed.
3. Officers within the EH service to undergo training to achieve competency in food standards inspections, enabling a single inspection to encompass a wider scope.
4. Removal of unnecessary administrative requirements identified through the systems review and investigation of the use of digital methods.

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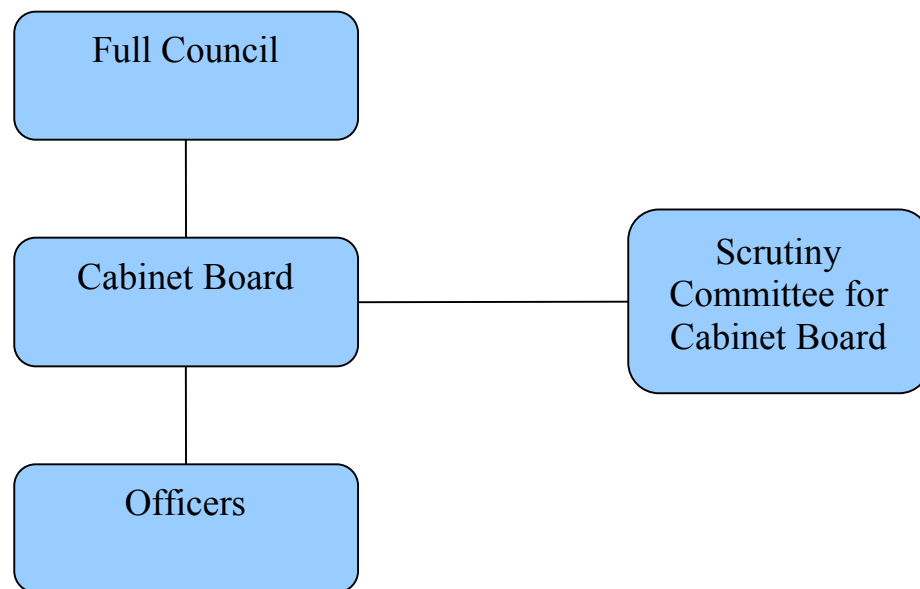
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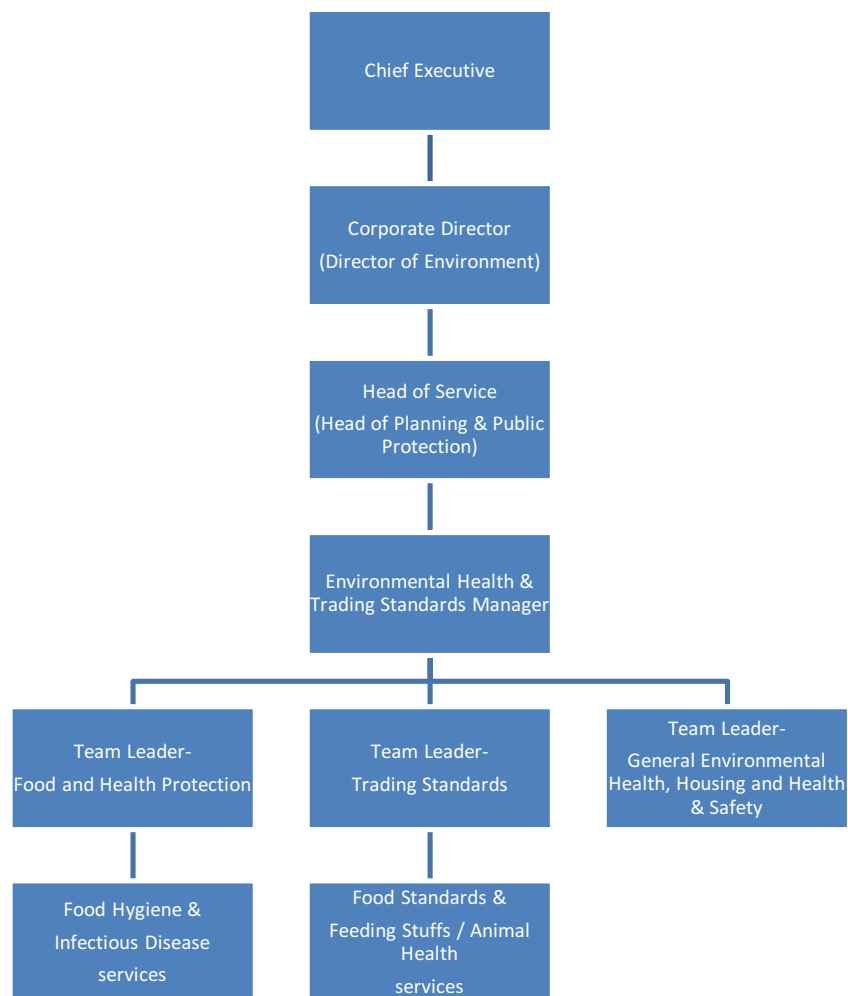
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APPENDICES

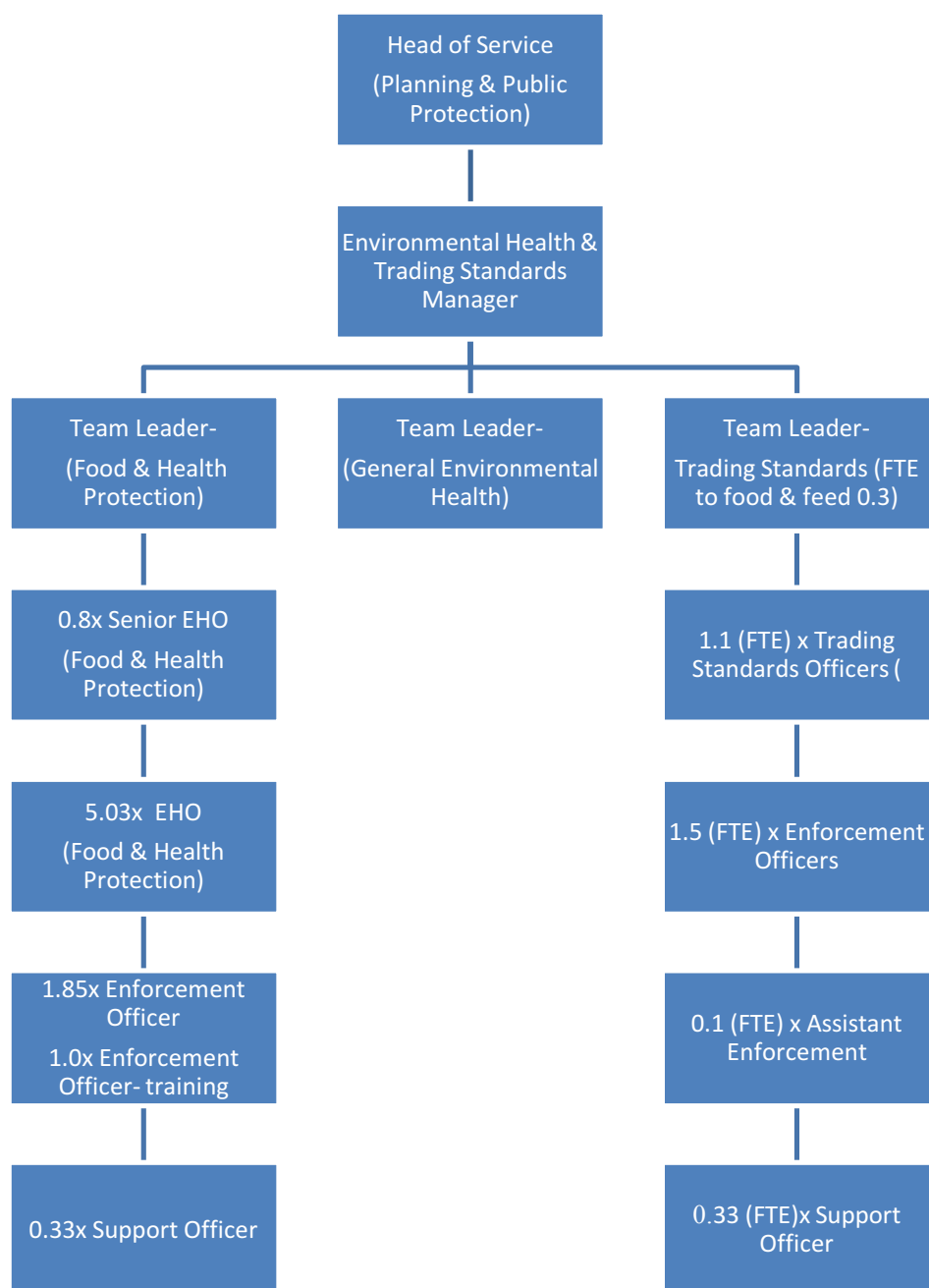
APPENDIX 1 - EHTS structure (Decision Making)



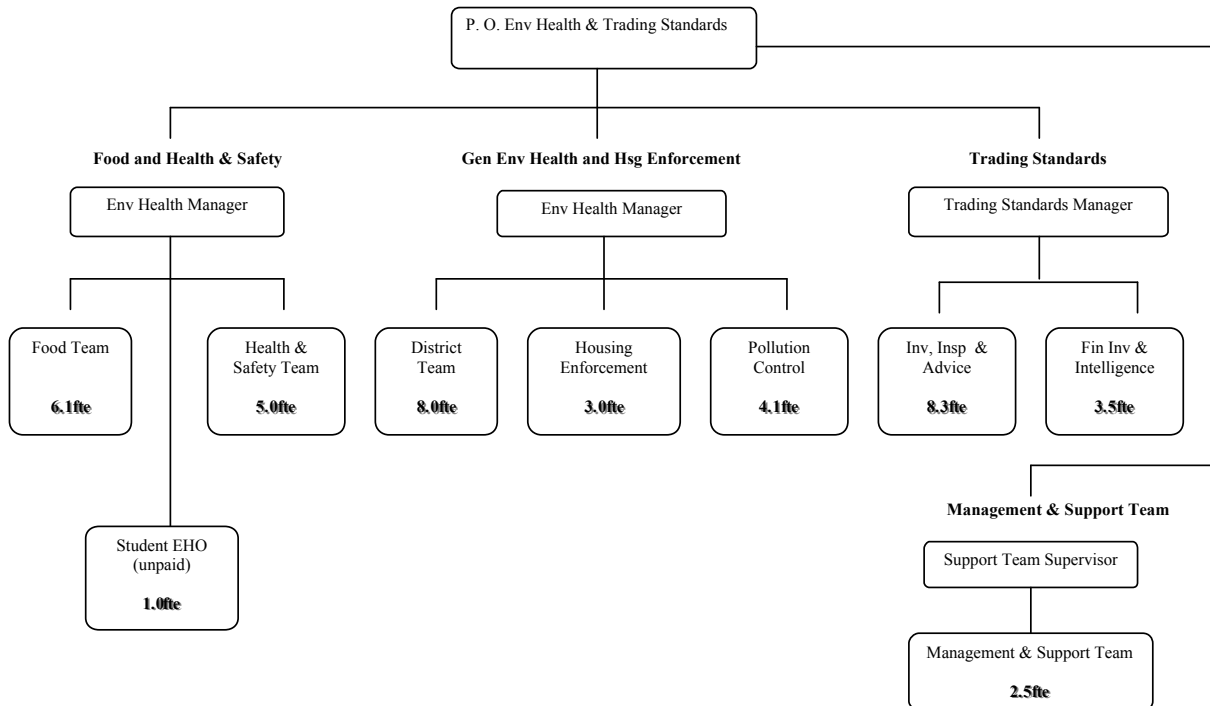
APPENDIX 2 - Department Structure

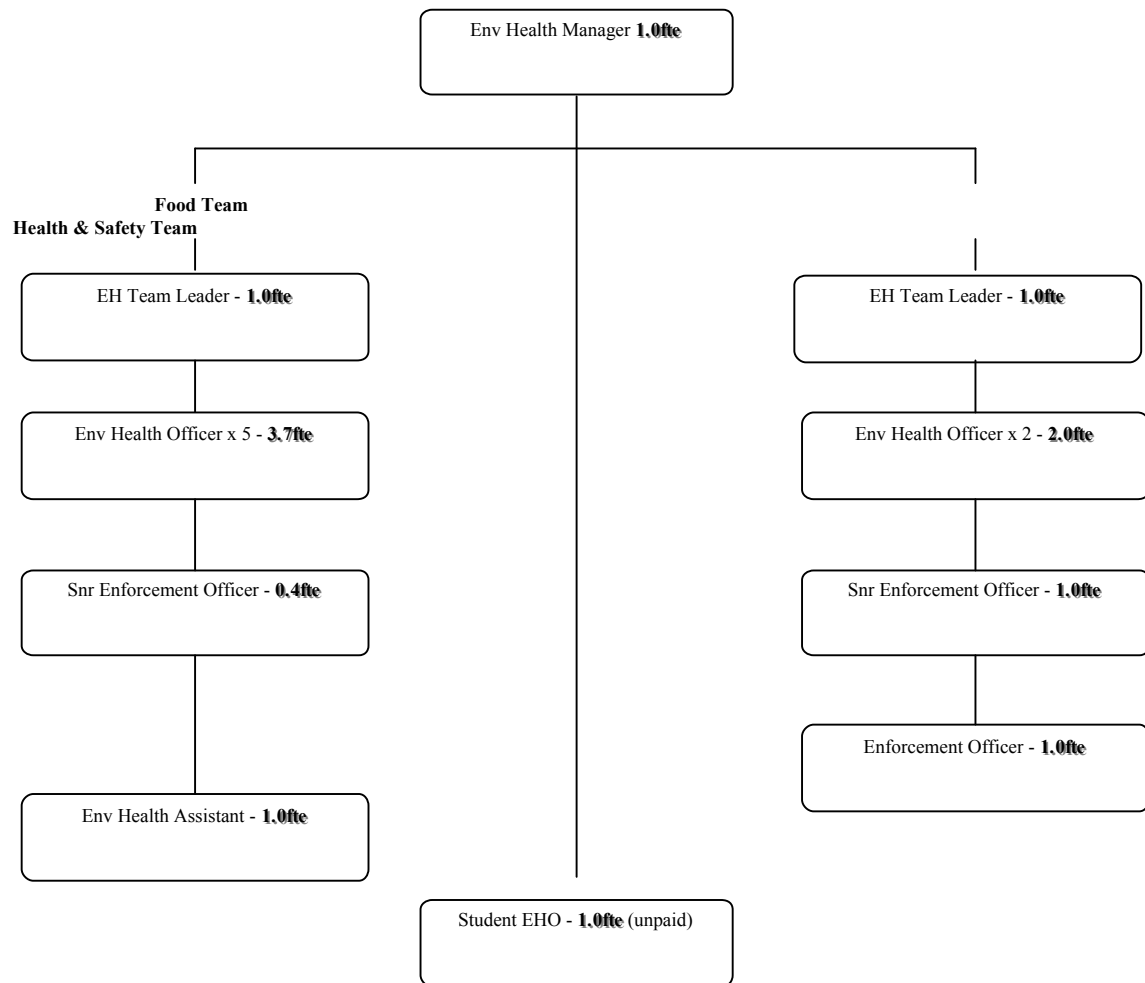


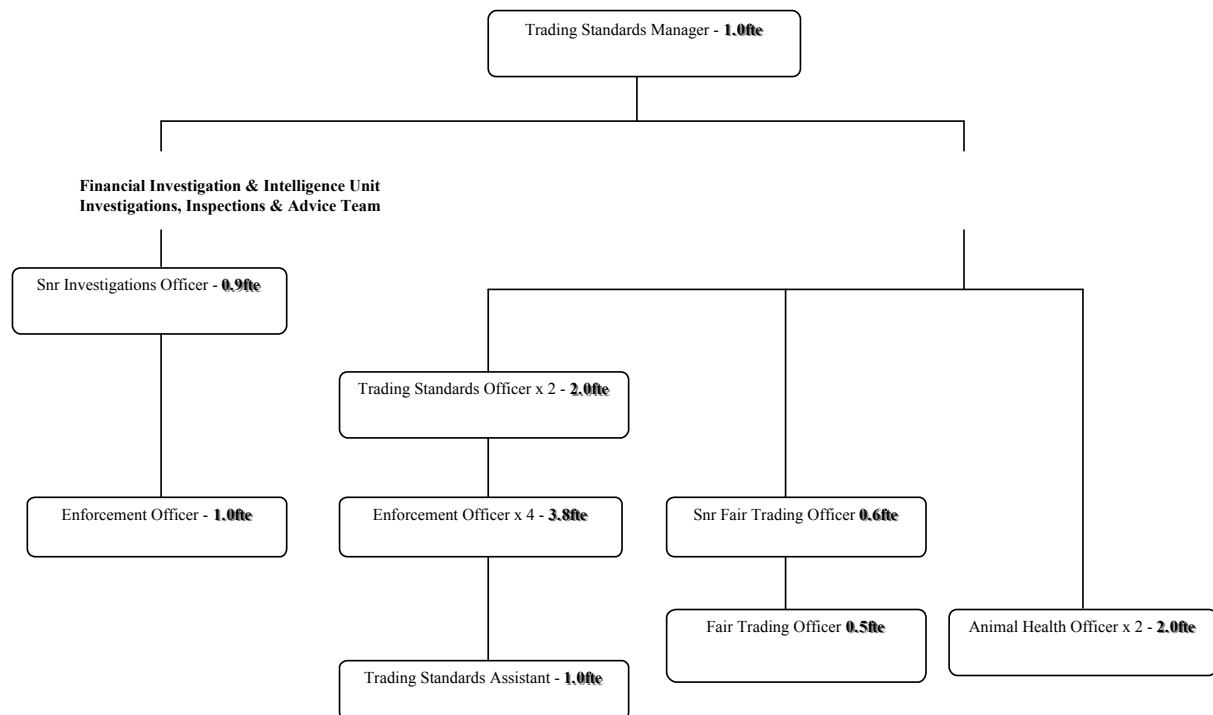
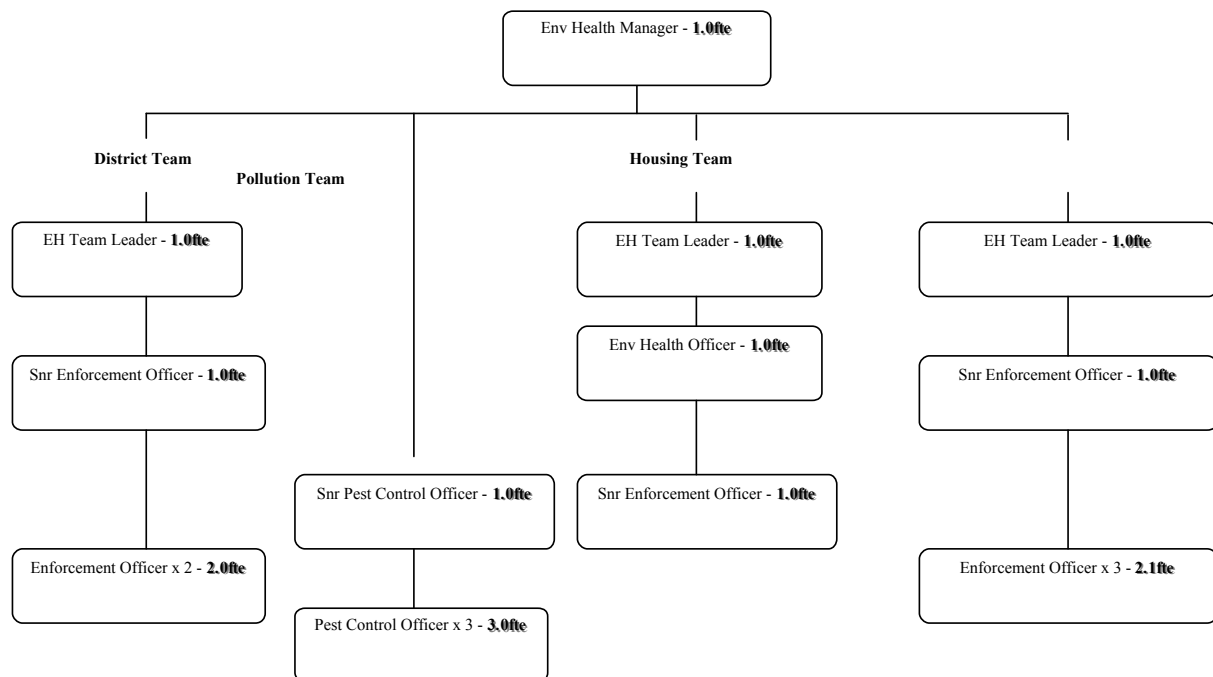
APPENDIX 3 - Service Structure: (As at 1/4/2017)

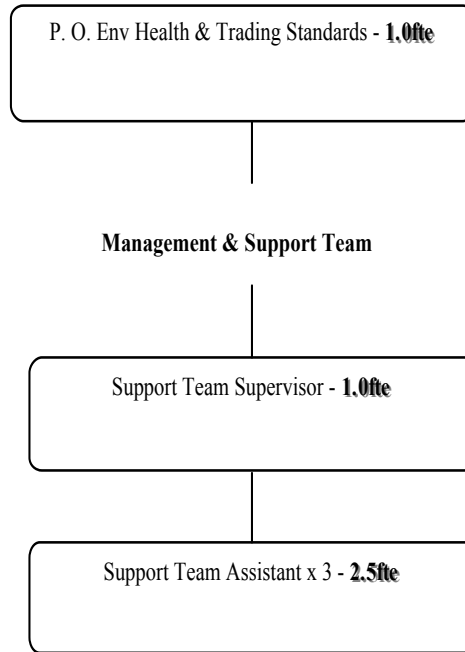


ENVIRONMENTAL HEALTH & TRADING STANDARDS STRUCTURE

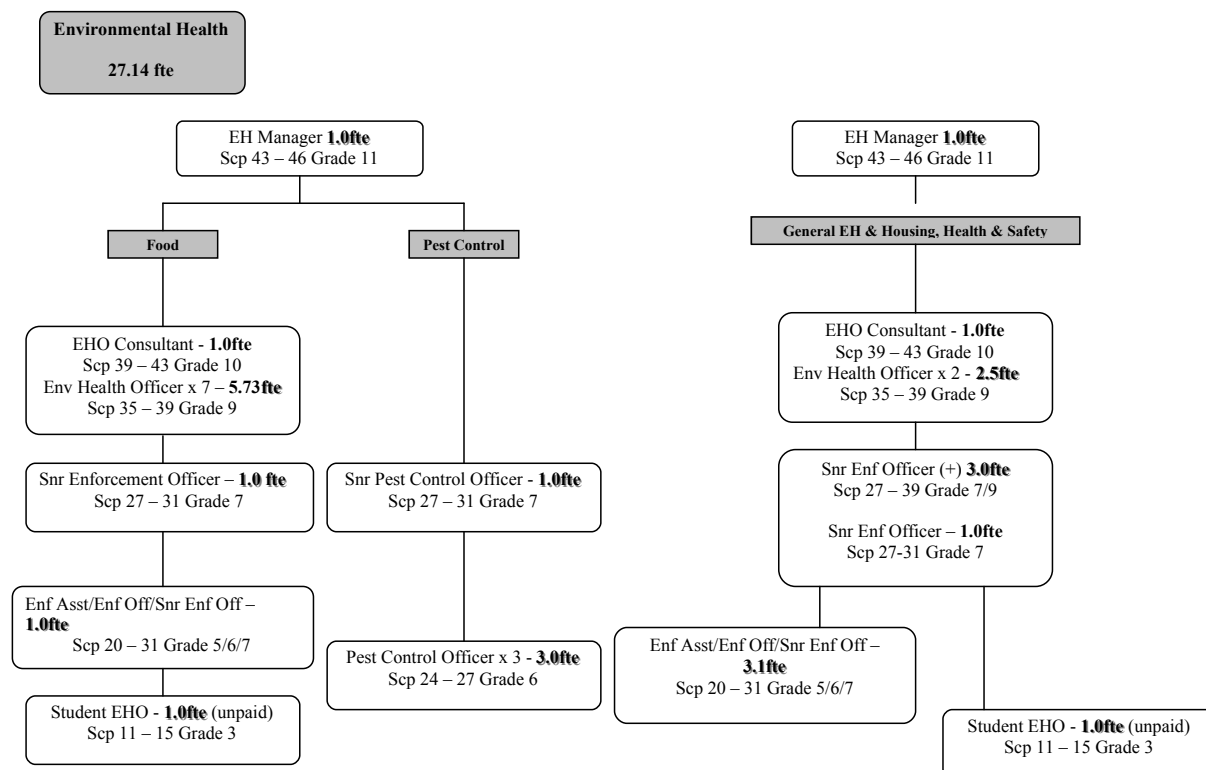
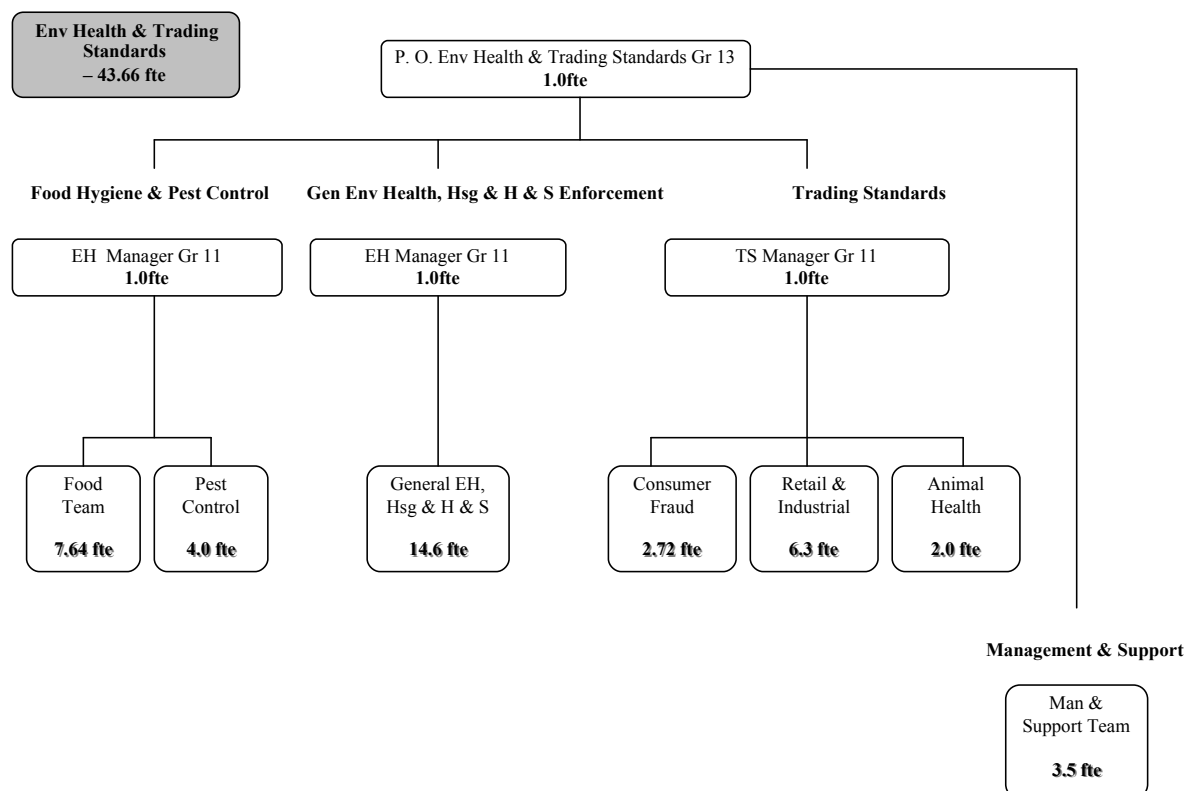




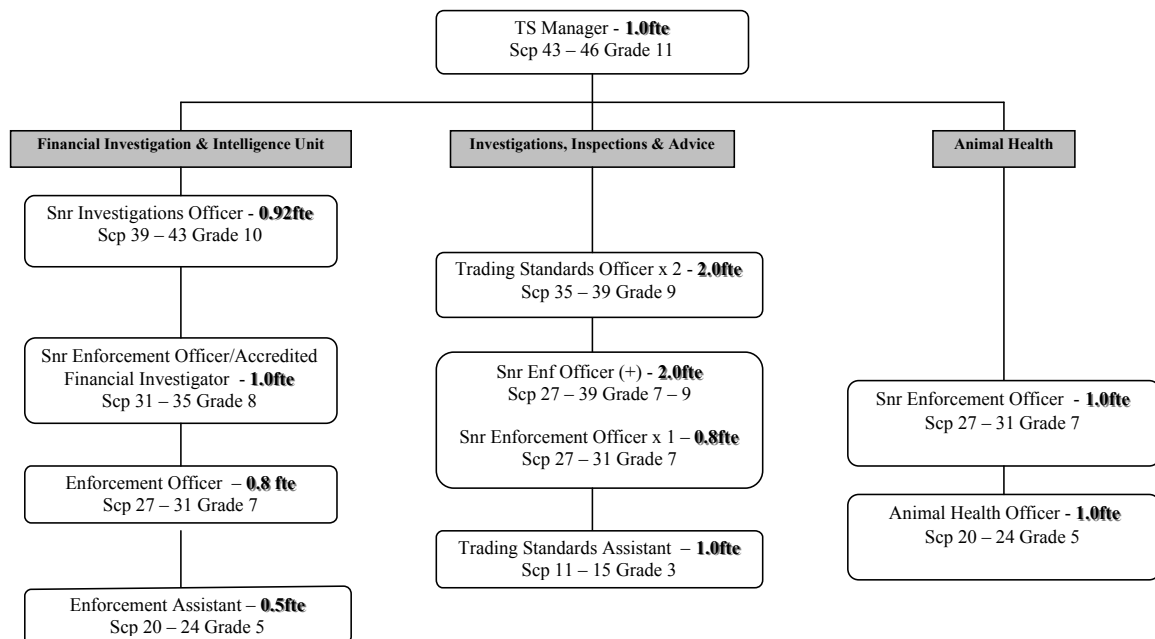




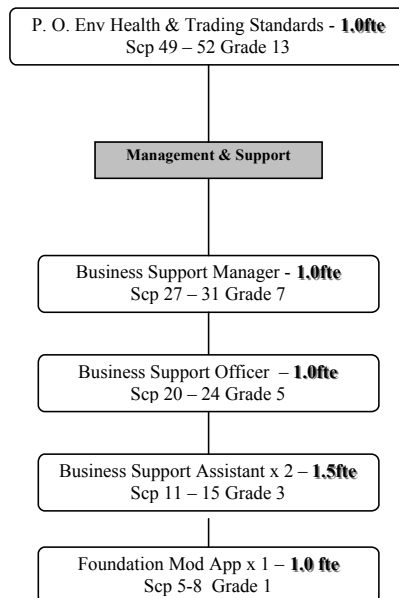
APPENDIX 4 – Environmental Health & Trading Standards Restructure 2015



Trading Standards
12.02 fte



Management & Support Team
4.5 fte



APPENDIX 5 - PESTEL Analysis of EHTS Service in NPTCBC

Political Future Regionalisation agenda - Wales recommends Swansea and NPT join together. FSA – Regulating our Future agenda has impact on Food Regulation in future. Brexit will alter relationships with EU states. Elected members of NPT require change following concerns on food service. New legislation to “score” food businesses promotes service either good or bad.	Technological Future Digital Agile working trialled to encourage mobile working. Website design to be self-serving.
Socio-cultural Future Regionalisation will alter the number and structure of local Government. Professional bodie of CIEH has reducing number of members.	Environmental Future The carbon footprint of the Authority is considered in corporate decisions. Electric cars are used, photocopiers are monitored etc.
Economic Future Austerity Agenda is reducing budgets in public sector year on year. NPT forward financial plan reducing departmental budgets.	Legal Future Additional regulatory responsibilities following the introduction of Public Health focussed legislation and initiatives such as the Food Hygiene rating Scheme and the licencing of Private Rented Landlords.

Mullins 2015, pg. 127

APPENDIX 6 - SWOT analysis of food safety service in NPTCBC

Strengths Adequate resource to achieve framework agreement standard. Experienced and well-trained staff in team Number of staff had experience of management at senior level History of positive culture to strive for targets EH Officers qualified to undertake all EH and TS functions under Food Law Code of Practice	Weaknesses Framework agreement not being met. System does not address growing backlog of new businesses. Some businesses being visited by EH and TS Officers looking at similar issues e.g. traceability, best before/use by dates
Opportunities New management in structure. Revision of all policies and procedures. Systems review of EHTS. Different approach to address areas of need.	Threats Possible loss of existing management staff. Possible transfer of service to other Department/Directorate or authority. Possible loss of service to central agency should FSA audit identify failings or RoF agenda be implemented.

APPENDIX 7 - Food Law Code of Practice (Wales) – April 2014

Minimum Food hygiene intervention frequencies

Category	Score	Minimum intervention frequency
A	92 or higher	At least every 6 months
B	72-91	At least every 12 months
C	42-71	At least every 18 months
D	31-41	At least every 24 months
E	0 to 30	A programme of alternative enforcement strategies or interventions every 3 years

Minimum Food Standards intervention frequencies

Category	Score	Minimum intervention frequency
A	101-180	At least every 12 months
B	46-100	At least every 24 months
C	0-45	Alternative enforcement strategy or intervention every 5 years

APPENDIX 8 - FSA Full Audit 2015 - Findings summary

<u>Strengths</u>	<u>Key areas for Improvement</u>
Officer training and development	Officer authorisations
Food hygiene records and interventions/ inspection records	Food hygiene, food standards and feed establishments interventions and inspection
	Food standards complaints
	Food hygiene sampling
	Control and investigation of food related infectious disease

APPENDIX 9 - Lewins Force Field Analysis (1951)

Forces for Change	Score		Proposal for Change		Forces resisting Change	Score
Increasing backlog food businesses that have not received advice or inspection (Internal)	5		Re-alignment of staff and functions in the food safety and Trading Standards team to ensure competent Officers visit food businesses to enforce Food safety functions		Disruption of existing teams status quo (Internal)	2
Increased resilience in team due to additional members of staff (Internal)	5				Larger scale change expected in future through regionalisation (External)	
Failure to meet performance indicators and COP standards for food hygiene inspections (Internal)	5				Trading Standards Officers not qualified to undertake food hygiene inspections in accordance with Food CoP	2
Roles and responsibilities of team members unclear (Internal)	2				Additional staff in team could address target issues and backlog if no change occurs. (Internal)	4
Impending revisit by FSA to assess audit recommendations implementation (External)	5				A large number of inspections been met within target response times. (Internal)	4
Potential inconsistency of advice given to food businesses	2				36% of businesses support separate food hygiene and	4

by different Officers (Internal)				Trading standards inspections	
Low morale and job satisfaction within teams. (Internal)	2				
No financial cost to service (Internal)	5				
TOTAL	31			TOTAL	16

APPENDIX 10 – Questionnaire for members (version 1)

<u>ENVIRONMENTAL HEALTH & TRADING STANDARDS</u>	
<u>Members Survey V.1</u>	
1.Name	
2. What ward are you councillor for?	
3. How long have you been a councillor?	
4. What services do Environmental Health & Trading Standards deliver?	
5. As a councillor what services that EH&TS deliver matter to you?	
6. If you have a food issue or query, who would you contact?	
7. Have you ever contacted the department on a food issue?	Y - Question 6 N - Question 9
8. What was the food issue? And was it from a constituent?	

9. Did you find it easy to contact the service? If not, why not?	
10. In your opinion was the experience	Very Good Good
	Acceptable Poor
	Very Poor N/A
Explain your reasons	
11. How do you like to contact the department?	'Phone, / e-mail / letter / social media / visit / text / Head of Service / visit office / EH&TS manager / other
11. How would you like to contact the department?	'Phone, / e-mail / letter / social media / visit / text / Head of Service / visit office / EH&TS manager / other
12. How often do you think food businesses are visited?	
How often do you want food businesses visited?	
13. How would you want food businesses checked?	Postal Questionnaire Inspection of business

	Testing of Food	Any Other
Describe "any other"		
12. How do you want to find information about our services?	For example: Intranet / social media / community newsletters / tv / radio / email / members briefings / meetings with managers / other	
13. Pick the food services most important to you, and indicate the single most important one to you		
Labelling	use by / best before, name, nutrition, storage and cooking instructions, ingredients, manufacturers name and address, origin, weight marking	
Hygiene of premises	Temperature control, hand washing, cross contamination, food storage, cleanliness, pest control, waste	
Contamination of food	Foreign body, chemical contamination, mould, microbiological	
Descriptions	How food is advertised. Including its written description and any pictures of it on packaging, on a menu, over the internet, or verbally	
Allergens	Declaration of allergenic ingredients in prepacked and non-prepacked food (takeaways, cafes and restaurants)	

Displaying Food Hygiene Rating Score	"Scores on The Doors" the hygiene rating of 0-5 you find in food business windows, menus and internet sites	
Food poisoning prevention	The steps taken by a business to ensure that the food is not going to harm the consumer	
14. Please give the areas in which you feel the service can be improved, and how		

APPENDIX 11 – Final questionnaire for members (version 3)

<u>ENVIRONMENTAL HEALTH & TRADING STANDARDS</u>			
<u>Members Survey V.3</u>			
1.Name			
2. How long have you been a councillor?			
3. What services do you think Environmental Health & Trading Standards deliver?			
4. As a councillor what services that EH&TS deliver matter to you & why?			
5. If you have a food issue or query, who would you contact?			
6. Have you ever contacted the department on a food issue?			
- Question 7 N - Question 11			

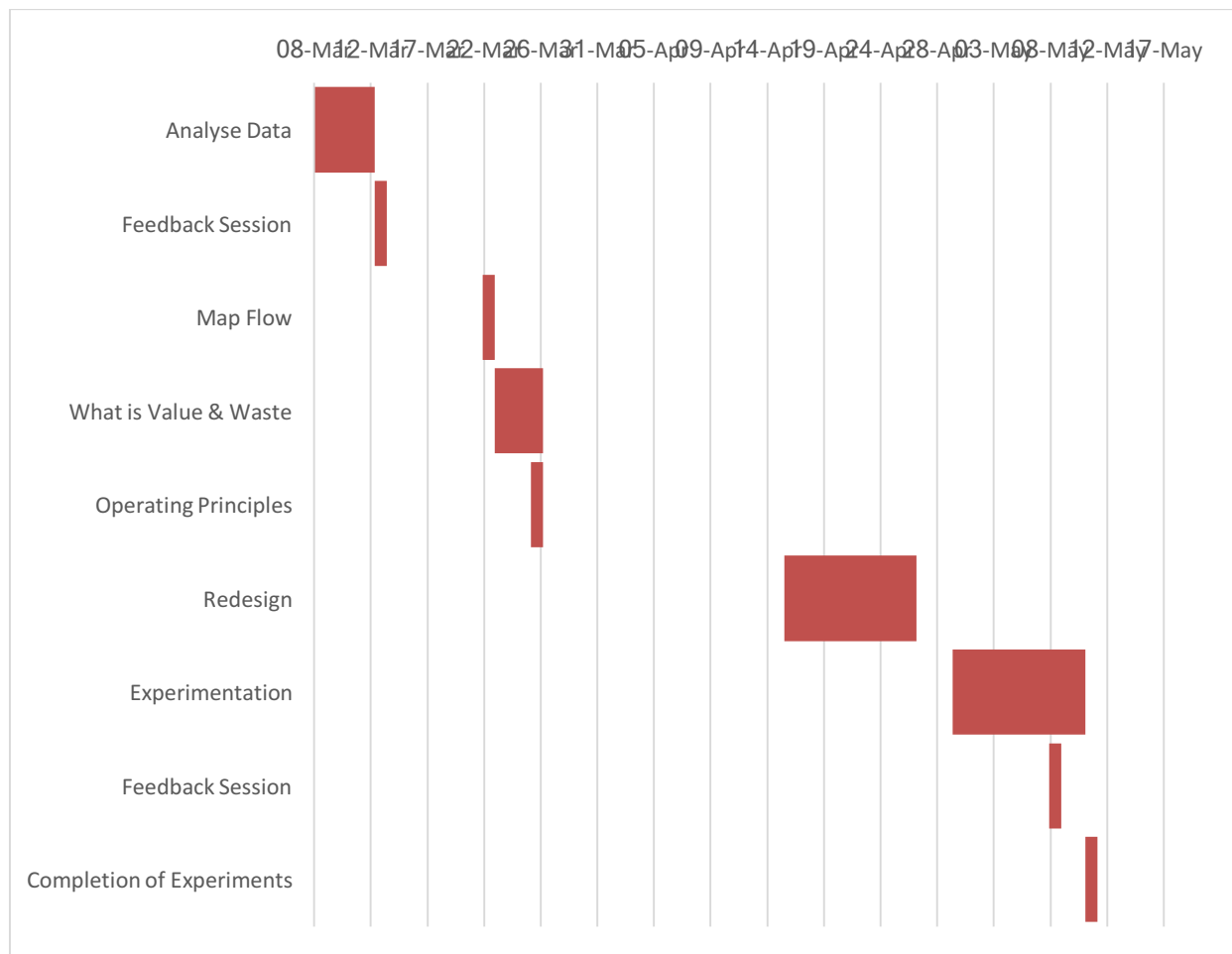
11. How do you like to contact the department?					E.g.
'Phone, / e-mail / letter / social media / visit / text / Head of Service / visit office / EH&TS manager / other					
7. How would do you like to contact the department?					E.g.
'Phone, / e-mail / letter / social media / visit / text / Head of Service / visit office / EH&TS manager / other					
8. What was the food issue? And was it from a constituent?					
9. Did you find it easy to contact the service? If not, why not?					
10. In your opinion was the experience					Ver
Good	Good	Acceptable		Poor	Ver
Poor	N/A				
Please explain your reasons					
11. How often do you think food businesses are visited?					
12. How often do you want food businesses visited?					

13. How would you want food businesses checked? Questionnaire Inspection of business Postcard Food Any Other (describe) Testing of food			
14. How do you want to find information about our services? For example : Intranet / social media / community newsletters / tv / radio / email / members briefings / meetings with managers / other			
15. Place the food services in order of importance (1-7)			
Subject	Description	Order	Comments
Labelling	use by / best before, name, nutrition, storage and cooking instructions, ingredients, manufacturers name and address, origin, weight marking		
Hygiene of premises	Temperature control, hand washing, cross contamination, food storage, cleanliness, pest control, waste		
Contamination of food	Foreign body, chemical contamination, mould, microbiological		
Descriptions	How food is advertised. Including its written description and any pictures of it on packaging, on a menu, over the internet, or verbally		

Allergens	Declaration of allergenic ingredients in prepacked and non-prepacked food (takeaways, cafes and restaurants)		
Displaying Food Hygiene Rating Score	"Scores on The Doors" the hygiene rating of 0-5 you find in food business windows, menus and internet sites		
Food poisoning prevention	The steps taken by a business to ensure that the food is not going to harm the consumer		

15. Please give the areas in which you feel the service can be improved, and how	
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Appendix 12 - Gant Chart for System review process



Task	Start Date	Duration	End Date
Analyse Data	08-Mar	5	12-Mar
Feedback Session	13-Mar	1	13-Mar
Map Flow	22-Mar	1	22-Mar
What is Value & Waste	23-Mar	4	26-Mar
Operating Principles	26-Mar	1	26-Mar
Redesign	16-Apr	11	27-Apr
Experimentation	30-Apr	11	11-May
Feedback Session	08-May	1	08-May
Completion of Experiments	11-May	1	11-May

APPENDIX 13 - Staff Questionnaires

What prevents you from doing inspections?

1. What stops you going out/ doing inspections? Keeps you in the office??
2. Talk us through a typical inspection day?
3. How do you plan/arrange visits, including inspections and revisits? (geographical, risk, type of business, use of outlook calendar /diary)
4. How do you plan and arrange out of hours visits? (evening/weekends) and what problems do you encounter when arranging these visits?
5. What would you suggest would improve the team's performance? (e.g. support, work allocations, reactive/pro-active workloads, agile working, IT etc.)

APPENDIX 14– Final questionnaire for consumers (version 3)

<u>ENVIRONMENTAL HEALTH & TRADING STANDARDS</u>	
<u>Consumer Survey V.3</u>	
1.What age category are you?	Under 18 19-30 31-45 46-60 Over 60
2. What services do Environmental Health & Trading Standards deliver?	
3. What services that EH&TS deliver matter to you?	
4. If you have a food complaint, who would you contact?	
5 Have you ever contacted the food service for a complaint or request for advice?	
Y - Question 6 N - Question 9	
6. Why did you contact the food service?	
7. Did you find it easy to contact the service? If not, why not?	
8. In your opinion was the experience	
Very Good Good	
Acceptable Poor	

	Very Poor	N/A
Explain your reasons		
9. How would you want to contact the food service?	e.g. 'Phone, e-mail, letter, social media, visit, text, live chat	
10. How often do you want food businesses visited?		
11. How would you want food businesses checked?	Postal Questionnaire Testing of Food	Inspection of business Any Other
Describe "any other"		

12. Where do you want to find information about our services? For example: Newspaper / internet / social media / community newsletters / tv / radio / email / other		
13. Pick the food services most important to you, and indicate the single most important one to you		
Labelling	use by / best before, name, nutrition, storage and cooking instructions, ingredients, manufacturers name and address, origin, weight marking	
Hygiene of premises	Temperature control, hand washing, cross contamination, food storage, cleanliness, pest control, waste	
Contamination of food	Foreign body, chemical contamination, mould, microbiological	
Descriptions	How food is advertised. Including its written description and any pictures of it on packaging, on a menu, over the internet, or verbally	
Allergens	Declaration of allergenic ingredients in prepacked and non-prepacked food (takeaways, cafes and restaurants)	

Displaying Food Hygiene Rating Score	"Scores on The Doors" the hygiene rating of 0-5 you find in food business windows, menus and internet sites	
Food poisoning prevention	The steps taken by a business to ensure that the food is not going to harm the consumer	
14. Please give the areas in which you feel the service can be improved, and how		

APPENDIX 15 – Final questionnaire for businesses

<u>ENVIRONMENTAL HEALTH & TRADING STANDARDS</u>
<u>BUSINESS SURVEY</u>
1. Name of Premises:
2. Type (e.g. wet pub. Or serving meals)
3. Position of person completing questionnaire:
5. What services that EH&TS deliver matter to you?
6. Have you contacted either service? If so, how?
7. Did you find it easy to contact the service? If not, why not?

8. Describe your last experience with the service. (advice, visit, telephone call / FH or FS).				
9. In your opinion was the experience				
Very good	Good	Acceptable		Poor
Very Poor	N/A			
10. How would you want your business checked?				e.g.
Questionnaire (e-mail or letter)		Inspection of business		Sampling
State Other				
11. Where do you want to find information about our services? For example: Newspaper / internet / social media / community newsletters / tv / radio / email / other				
12a. Do you know you currently receive a separate food standards and food hygiene visit?				
12b. The visit frequencies for FH & FS are different. How would you want hygiene and standards visits carried out?				

13a. Do FS & FH check your business enough? Please explain your answer		
13b. How do you feel about the amount of time spent by TS & FH at your premises?		
14. Please comment on the advice given to you on site.		
15. Please comment on the advice delivered to you following the visit.		
16. What is your preferred method of communication after a visit? E.g. e-mail / social media / letter etc.		
17. Place the following services in order of priority for your business.		
Service	Order	Comments
Advice		

New Legislation and changes to guidance		
Food Training Courses		
Food Hygiene Rating Scores		
Inspections		
Sampling		
Food alerts & recalls		
Combatting food fraud		
Other		
18. Please place the food subjects in order of importance (order 1-7) and comment where necessary		
Subject	Order	Comments
Labelling. use by / best before, name, nutrition, storage and cooking instructions, ingredients, manufacturers name and address, origin, weight marking		

Hygiene of premises. Temperature control, hand washing, cross contamination, food storage, cleanliness, pest control, waste		
Contamination of food. Foreign body, chemical contamination, mould, microbiological		
Descriptions. How food is advertised. Including its written or verbal description and any pictures of it on packaging, on a menu or over the internet		
Allergens. Declaration of allergenic ingredients in prepacked and non-prepacked food (takeaways, cafes and restaurants)		
Displaying Food Hygiene Rating Score. "Scores on The Doors" the hygiene rating of 0-5 you find in food business windows, menus and internet sites		
Food poisoning prevention. The steps taken by a business to ensure that they food is not going to harm the consumer		

17. Please give the areas in which you feel the service can be improved, and how