

Sustainable Development Select Committee		
Report Title	Restructuring of Enforcement and Regulatory Services – saving proposal H1	
Key Decision	No	Item No. 4
Ward	All	
Contributors	Executive Director For Community Services	
Class	Part 1	20 January 2015

1. Background

- 1.1 This report provides an update to members of the Sustainable Development Select Committee regarding savings proposal H1- Restructuring of Enforcement and Regulatory Services.
- 1.2 At the 30 October 2014 meeting of The Sustainable Development Select Committee and the 3 November meeting of the Safer, Stronger Communities Select Committee various further details were requested in relation to saving proposal H1 including any matters arising from staff consultation. This report is an update following this this request and includes information in response to specific questions asked.
- 1.3 The Mayor & Cabinet meeting of 12 November 2014 asked that proposal H1 be resubmitted on 11 February 2015 for final decision updating on consultation and having been further considered by the relevant Select Committees.

2. Updates

What would be different against each separate service area in the proposed model?

3. Update

- 3.1 The following table attempts to capture some of these; however there will be some things that might not be apparent at this stage. The proposed new model is intended to equip the remaining officers with the ability to undertake a wider range of activity after appropriate training and to ensure that statutory responsibilities can continue to be addressed. We are adopting problem solving and intelligence actions but we still aim to tackle the main problems although invariably with less staff; it is proposed that a reduction in overall staff numbers will be mitigated by increased flexibility.

- 3.2 Problem solving has become a tested model of working in tackling anti-social behaviour. In partnership with the Police this approach has allowed us to work with less staff – but in a more targeted and responsive way. The intention is to develop this way of working across the different service areas that have been brought together and an intelligence based method of working is already being piloted in Trading Standards.

Service area	What will be different
Anti-Social Behaviour	<p>Reduced preventative offer – i.e. safety advice sessions/ delivery of ASB, knife crime, cyber bullying and hate crime in schools and youth clubs.</p> <p>Reduced crime prevention roadshows</p> <p>Maintain surgeries in locations where problem solving profiles/ geographical issues are being dealt with under the risk matrix – this will mean other areas may not get a regular surgery.</p> <p>Cease delivering youth shoplifting awareness course</p> <p>Reduce work in relation to things like property marking/ helping people log phones/ electronic items etc.</p>
Licensing	<p>No dedicated officer to deal with licensing matters but a wider pool of trained staff to do this. A wider range of issues can be addressed during a single visit.</p> <p>More available staff to attend and support the Licensing Committee. A licensing ‘lead’ officer will be nominated to ensure consistency & co-ordination is maintained.</p> <p>Routine premise visits will be replaced by more targeted visits – visits will be predicated on risk/ Intel/ issues of non compliance</p>

<p>Public health and Noise Nuisance</p>	<p>Noise nuisance complaints will be assessed & responses prioritised. Officers will be deployed to visit out of hours noise 'hotspots' when required on a programmed intelligence basis. Greater use of information & evidence from partner agencies to support action will be made where possible along with increased use of pre-emptive noise abatement measures Drainage & matters relating to filthy & verminous conditions at private premises will be addressed with support from Food & Safety team as necessary. A vigorous system of prioritising case work will be applied</p>
<p>Trading Standards</p>	<p>There will be reduced service delivery and services will be provided by reference to a newly developed service risk/intelligence matrix. This may mean that individual consumer complaints will not be investigated and that where appropriate, greater use of advisory measures will be made in cases relating to counterfeit goods and product safety. Whilst we will seek to maintain some level of support to residents vulnerable to doorstep rogue traders & mass marketing scams it is likely that preventative work will be scaled down.</p>
<p>Food Safety and Hygiene</p>	<p>Still meeting the requirements of the FSA as most practicable. Priority will continue to be given to meeting the Food Standards Agency prescribed requirements relating to the inspection of food premises. We will seek to ensure that infectious disease etc. notifications are responded to.</p>

Health and Safety	Significant health & safety incidents will continue to be investigated. This team will also undertake duties relating to special treatments licensing as many requirements are health & safety related. In addition to undertaking duties relating filthy & verminous conditions at commercial premises, this team will also support Public Health & Nuisance team with such matters at residential premises
Environmental Protection	Whilst there will be fewer staff, lead officers for each of noise, contaminated land & air quality will be identified in order that statutory strategic requirements can continue to be addressed. This service will continue to provide specialist comment & advice on large scale planning developments but detailed input to medium and smaller scale developments will be reduced with greater reference being made to planning policy documents.

4. ***What is the data in relation to noise call outs / officer availability/ peak periods/ cost of current noise service/ what consideration has been given to the impact and the service needs to be more resident focused.***

5. **Update**

5.1 For clarity, the new proposed model is not to lose any specific function, but to realign the functions and enable officers to be multi-faceted and work across a number of enforcement agendas. The noise service as it exists currently is only available until Midnight Mon- Thurs and until 3am Friday–Sundays therefore the service is not able to tackle issues that rise outside of these hours. If a call comes in outside of these hours, the switchboard would take details and pass the information on.

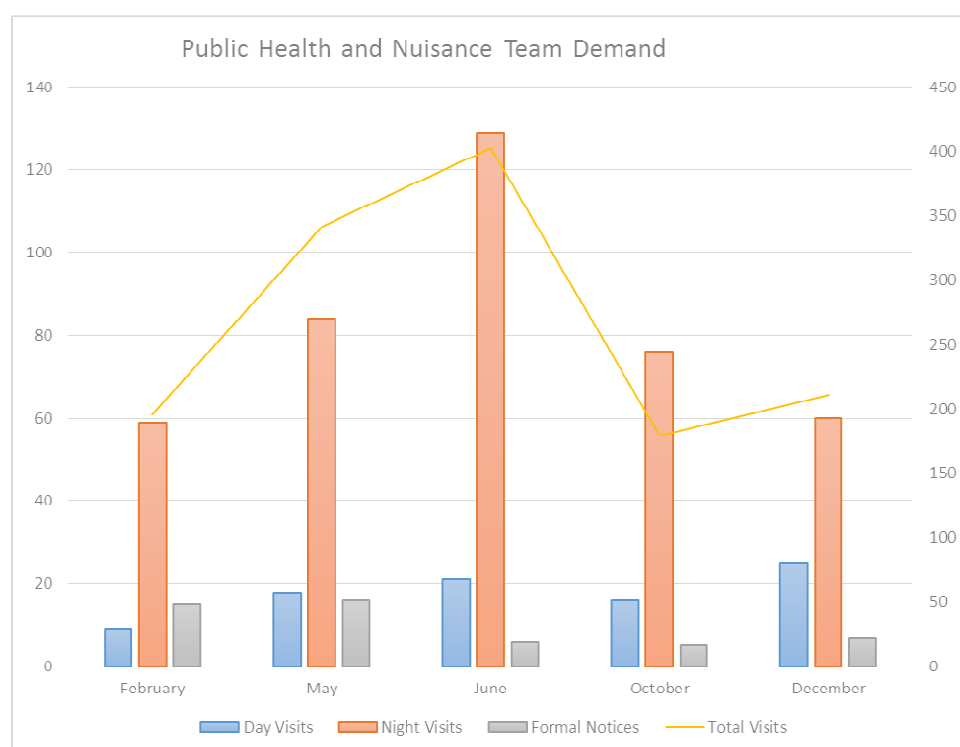
5.2 The service is also restricted by the number of officers it has and their ability to cover all shifts/ rotas. Police support may also be required on occasion but may not always be readily available. Officers are required to attend in pairs for safety and evidential reasons and in some instances require the police to accompany them dependent on the issue. Although instances of the service having to be suspended due to sickness and other issues are rare, service capacity means it is not always possible to provide the prompt response assumed & arguably not all matters require immediate attention.

5.3 The current cost of the bespoke service that deals with noise nuisance including overtime is up to £510K per annum.

Env Enforcement 2014 - 2015	April	May	June	July	August	September
Data Required	Number	Number	Number	Number	Number	Number
Total No. of noise nuisance complaints received	201	342	403	453	469	366
No of complaints receiving a visit	101	253	246	296	362	285
No. of <u>noise</u> notices issued	8	4			11	
No. of <u>noise</u> prosecutions	1	0			0	

5.4 Data accurate to September 2014: Public Health and Nuisance Team

When plotted, the demand appears as follows:



5.5 It is to be noted that there are questions about the reliability of this data due to data entry issues.

5.6 The real issue is not the number of demands for service at night – or “out of hours” – but rather whether the staff deployed could perform an effective out-of-hours action as a result of the call and whether its nature justifies an immediate response visit.

5.7 Anti-Social Behaviour

5.7.1 Hub Solutions, the IT performance tracking system that supports the Neighbourhood Community Safety Service has been having problems so a full dataset was not available in time for this report.

5.7.2 There had been 20 major long-term “Problem Solving Profile” (PSP) pieces of work. The Service gets between 150-250 calls + emails a week from residents seeking advice and action in relation to ASB or Crime problem. Some of these become cases, while others are people who ring us to progress other issues as the service has been advertised widely. The number of ASB cases in 13/14 was 369.

5.7.3 It is noteworthy, that where there is alarm, harassment or distress being caused by Noise the Police can and will respond.

6. *How can other agencies /RSL s be involved?*

7. Update

7.1 We are certainly exploring how RSLs and Lewisham homes can support the work in all aspects of ASB/ noise and housing. It is important to highlight that we have worked with these bodies over the years and have developed services jointly in relation to CCTV, housing enforcement in relation to adding in requirements to tenancies' that assist in tackling crime, ASB, dogs etc. we will build on already strong working relationships to further develop services in this area.

8. What is the current level of fines and usage?

9. Update

9.1 The level of fines used in the services impacted by these reductions is minimal – there are a range of enforcement tactics that we can employ and we use those that are most proportionate and appropriate for the issues at hand. We use a significant amount of mediation and neighbour dispute resolution techniques, as well as lower level compliance encouragement tools such as Acceptable Behaviour Contracts.

9.2 Where formal enforcement and legal action is taken these result in some successful outcomes in relation to seizures of large amounts of illegal tobacco for example – however often the courts do not give the Council any compensation just costs. We will be working to develop better processes for us to be able to recover POCA – Proceeds Against Crime Act money – which upon a successful operation and seizure the Council can receive a proportion of the value of the items seized. It should be noted that a significant number of matters are resolved informally e.g. Trading Standards seizures of small quantities of illicit tobacco & alcohol are normally dealt with by voluntary surrender and written warning & subsequent monitoring of the premises at which they were discovered with a view to stronger action if a repeat breach occurs.

9.3 The Committee asked specifically in relation to fines and enforcement for business waste specifically. The committee were advised that this service area was not currently within the scope of the proposals being discussed. Officers in these service areas work closely with officers in the service areas within this proposal where appropriate to jointly tackle issues and concerns related to trade waste/ non-compliance.

10. Further Information

10.1 In addition to the referral responses above, officers would like to present a range of additional information.

10.2 This further information outlines the proposed revised principles and structure covering the following current areas of work:

- Crime reduction service
- Environmental protection
- Food safety
- Health and Safety
- Public Health & Nuisance
- Licensing
- Trading standards

It does NOT include:

- Building control and planning
- Housing enforcement e.g. Rogue Landlords
- Clean streets & markets enforcement

11. Rationale for the proposed changes

- 11.1 The Council is committed to “making Lewisham the best place to live, work and learn”, and to providing a cohesive, efficient and effective front line service that enables residents to feel safe with low levels of crime and anti-social behaviour. The Council does however have to reduce its expenditure by approximately £95 million over the next three years. Service areas listed above have been asked to identify £800K reduction in spend.
- 11.2 In identifying these proposals, consideration has been given to the Council’s well established principle of achieving greater accountability and efficiency through flatter managerial structures and intelligent resource allocation of staff.
- 11.3 The options considered have also taken regard of what is currently delivered and what impact changes would have on residents, and clarifying what the current offer is and what it is not.

12. Service Issues

- 12.1 There are a number of statutory requirements which the Council must meet within these areas; however the Level / Frequency/ Amount that needs to be delivered for most areas are dependent on local need and policy. The primary exception is that of food hygiene & standards. The following examples are intended to broadly illustrate the position. It should be noted that the table below is indicative only and it is accepted that other examples of statutory activity exist.

Statutory Area of Activity	Duty of Local Authority
Weights & Measures	Appoint chief inspector and enforce legislation. No level of activity specified
Fair Trading & Product Safety	Enforce legislation and consider certain types of fair trading complaint
Noise	Investigate complaints and serve abatement notice if considered a statutory nuisance
Food Hygiene & Standards	To inspect premises at prescribed frequencies based on risk
Air quality	Periodically review and assess the air quality within their area
Crime and Offender management	Statutory responsibilities to reduce reoffending. S17 to prevent crime and disorder.
Anti-Social Behaviour	New duty to develop a Community Trigger protocol for ASB, advertise and implement. ASB & Policing Act 2014
Domestic Violence	Duty to implement a Domestic Homicide Review (DHR) following any domestic homicide. Includes duty to appoint independent DHR Chair and report back to Home Office

12.2 There are some areas which require a specific qualified officer to deliver/ enforce including Food Safety and Weights and Measures. There are a number of synergies within identified service areas, as well as many ways to join up/ cluster services – however, in order to meet the absolute minimum requirements and attain the savings required, significant changes in roles and service activity is proposed.

13. The Proposal

13.1 What is currently undertaken?

The following is an illustration of the kinds of work the services undertake:

<p>Inspections of all premises serving/selling food (e.g. restaurants, retailers) for hygiene and food standards requirements</p> <ul style="list-style-type: none"> - frequency is specified by FSA - Food notices / closures
<p>Anti-social behaviour</p> <ul style="list-style-type: none"> - manage and implement reduction strategies - Investigate and lead partnership activity - Take action <p>A range of legal powers : community triggers, crack house closures, injunctions etc.</p>
<p>Administration and enforcement</p> <ul style="list-style-type: none"> - all applications and compliance checks - I.e. alcohol / late night / <p>Committee requirements</p>
<p>Health and safety</p> <ul style="list-style-type: none"> - obligation to enforce - High risk premises / proactive response - Sports grounds <p>Investigation of workplace accidents</p>
<p>Age restricted goods –</p> <p>Sale of alcohol, fireworks, tobacco, butane lighter fuel to persons under 18</p> <p>Control of illicit tobacco & alcohol, tobacco display</p>
<p>Statutory nuisances. PESTS (identify but not remove), drains, alarms, amplified noise.</p>
<p>Air quality (dust, pollutants)</p> <ul style="list-style-type: none"> - review and assess - 4 air quality monitoring stations
<p>Unauthorised encampments - travellers</p> <ul style="list-style-type: none"> - undertake the initial welfare assessment - Work with police - Agree legal action if Council land <p>Advise others if not council land</p>
<p>Trading standards</p> <p>Dealing with rogue traders such as letting agents & doorstep sellers, consumer, product safety, counterfeit goods.</p>

13.2 Many of these services have reduced over the years in relation to staffing and capacity. Therefore some services may be perceived to be delivering a level of service which they do not.

13.3 Noise nuisance is an example of this:

The noise service as it exists currently is only available until Midnight Mon-Thurs and until 3am Friday – Sundays therefore the service is not able to tackle issues that arise outside of these hours. If a call comes in outside of these hours, the switchboard would take details and pass the information on.

13.4 The service is also restricted by the number of officers it has and their ability to cover all shifts/ rotas. Police support may also be required on occasion but may not always be readily available. Officers are required to attend in pairs for safety and evidential reasons and in some instances require the police to accompany them dependent on the issue. Although instances of the service having to be suspended due to sickness and other issues are rare, service capacity means it is not always possible to provide the prompt response assumed & arguably not all matters require immediate attention.

13.5 Officers often go to a call and if they do not hear anything make no contact. Where they do hear noise they will seek to enter the premises of the Complainant to gather evidence, If officers do consider that a statutory noise nuisance has occurred, contact will also then be made with the alleged perpetrator if it is considered safe and practical to do so. A letter is sent the following day to the perpetrator of the noise whether heard or not.

14. It is proposed that the Principles to be adopted include:

- Paying regard to the actual statutory requirements of delivering the function & being realistic about the amount of activity actually required
- Risk and intelligence based approach
- Establish a minimum acceptable level of routine operations
- Use intelligence and risk assessment to determine necessary 'surge' capacity and capabilities in the main, whilst giving due consideration being given to a reasonable base level of service.
- Limited prevention / proactive service
- A flexible multi skilled team able to provide current and future requirements of an enforcement service
- Focus on harm / harmful premises/ harmful goods and premises across all areas specialist and non specialist: a focus on hazards
- A single point of contact for businesses / public – not have multiple visitors / officers dealing with single issue matters. This is consistent with the government's "better regulation" agenda as it should lead to better co-ordination of action.
- Ensure that officers use a wide range of powers and enforcement tactics to tackle and get resolution to an issue.

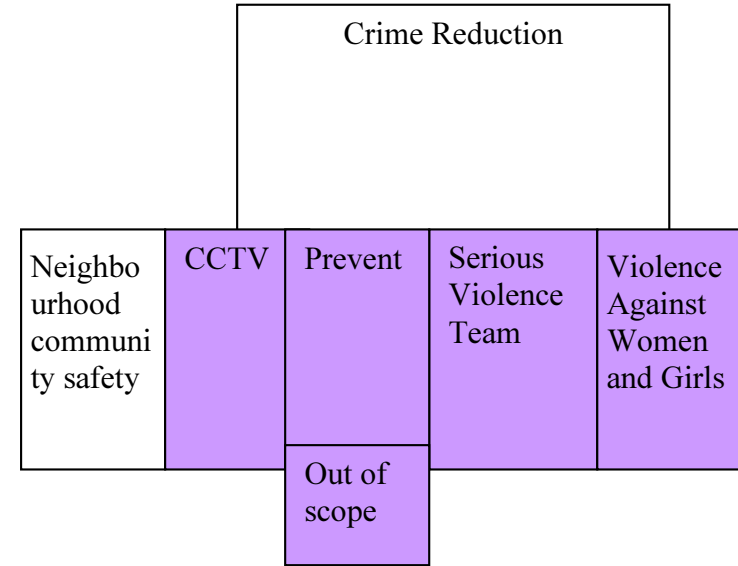
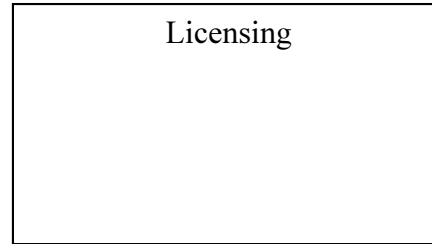
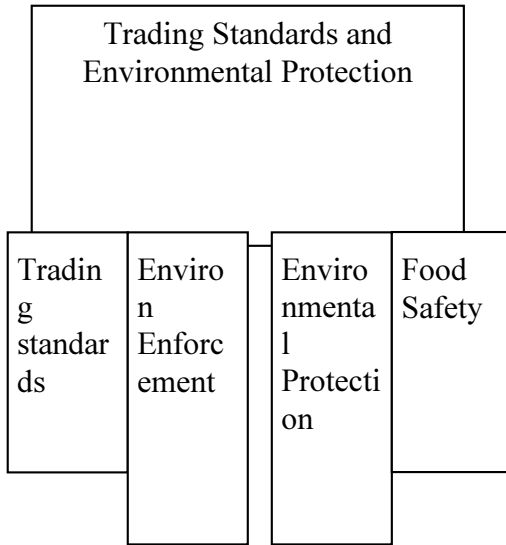
15. What will be different:

- Officers will need to be skilled in a wider range of areas – more multi-faceted staff dealing with more issues – breadth of specialism that does not require specialist qualifications. Roles that require a specialist qualification will be maintained at a reasonable minimum level but with regard to local need.
- Focus and target resources– i.e. changes in night time noise response matching the service to real need more closely than currently – discussions with partner agencies about out of hours response where alarm, distress or harassment is being caused.
- Change in enforcement policy to focus on an intelligence led and risk based model – with consideration given to randomised checking at medium/ low risk for test purposes where considered justifiable, in identified problem areas or as a part of a wider Partnership operation
- A reactive service that is less focused on pro-active routine inspections, unless intelligence suggests otherwise
- A reduction in the number of staff delivering these functions

16. Possible models - FUNCTIONS not PEOPLE or POSTS :

Option 1

Maintain the current set up – requiring reductions in each area.



Option 2

Cluster business regulatory services together and multi skilled enforcement services, for example as follows.

Food safety
Health and Safety
Licensing

Neighbourhood Community
Safety
Licensing
Trading standards
Public health and Nuisance

Environmental Protection

Option 3

Cluster specialist Environmental Protection provision and multi skilled public realm enforcement

Food safety
Health and Safety
Environmental Protection
Public Health Nuisance
including Drains/ Pests
Licensing

Neighbourhood Community
Safety
Licensing
Trading Standards
Noise Nuisance
Public Health Nuisance
including Drains/ Pests

There are options to organise service delivery by geographical clusters' – i.e. North, Central , South, but retaining flexibility to deploy staff wherever required.

17. Options considered:

- 17.1 Option 1 would merely mean silo reductions and trying to maintain distinct services areas with significantly reduced staff – in already small teams. The reality of being able to deliver services with the smaller numbers in some areas would be impossible.
- 17.2 Option 2 would merge services into a business hub, multi skilled enforcement hub and an environmental protection hub. This will result in a reduction in staff but would not address senior management posts.
- 17.3 Option 3 would develop a dedicated service around Environmental Health / protection provisions in the main and a Flexible multi skilled public realm enforcement service with the ability to deploy a range of enforcement activity in relation to public nuisance and other unlawful or dangerous public and business behaviour.
- 17.4 Activity levels will follow a risk based/ intelligence led model with “routine” checking curtailed to problem areas or joint operations. There will need to be some checks and balances of medium and low risk areas on a ‘sampling’ basis to ensure compliance – but focus will be the high risk/ greatest harm areas/ premises.
- 17.5 A change in the night time service primarily for noise and licensing will mean a reduced regular ‘routine’ service – but flexibility to deliver an ‘out of hours’ service is required where risk and intelligence identifies a need.
- 17.6 A criteria and agreement around what cases will progress to legal enforcement will be developed for clarity in identifying tools/ powers and options and costs. A dedicated budget will need to be identified for this along with a case prioritisation system.
- 17.7 Maintaining posts that require specialist qualifications in food safety are prioritised. Other qualification posts will be maintained at reasonable minimum levels with regard to local need, seeking to purchase in the service if required.
- 17.8 All posts in the multi skilled public realm enforcement service will receive delegated powers across the whole remit of the service area where legally possible and it is hoped to retain a core of specialist knowledge to underpin this new approach. Lead officers will be identified for Trading Standards, Licensing, Community Safety & Public Health & Nuisance respectively.
- 17.9 Work will be undertaken to ensure that any first response to residents/ businesses is reassuring, supportive and enabling further action to be taken if required.

18. Outcomes being sought to achieve include:

- Improving outcomes and finding resolution for residents and the community.
- improved use of officer time and ability to deliver across a range of enforcement and regulatory services
- improved public health outcomes in relation to food & other product safety and in the quality of the environment
- focus on high risk / persistent problems/ issues/ areas
- maintaining service input to the redevelopment process to influence air quality and address contaminated land and strategic noise issues.

19. Phase 2 – to further explore options around outsourcing / buying in aspects of the provisions/ joint delivery with other Boroughs

20. Issues Raised from staff consultation

Staff consultation began on the 18 November 2014 with written responses being completed by the 9th January 2015.

The following are an illustration of the issues being raised:

- It is not possible to deliver what is being expected within the new roles and structure - concerns about the wide breadth of knowledge required.
- There has not been sufficient consideration about the requirements and staffing capacity and skills and knowledge within Food Safety, Environmental Protection and Trading Standards teams.
- Concerns about the grading of posts and the process for application / eligibility for new posts under the management of change policy.
- Concerns about the impact, the ability and capacity to deliver statutory services. Full detailed responses will be made to all issues raised. Whilst the above concerns have been noted It is assessed that these issues are not insurmountable nor sufficient to reconsider the delivery model and its fundamental principle of increased service flexibility and adaptability. There has been agreement to amend some of the job descriptions in line with the comments raised by staff during the consultation process

21. Feedback from key partners and stakeholders.

21.1 The proposals have been discussed with a number of key senior stakeholders and partners particularly in respect of the Crime, Enforcement and Regulation aspects with the Community Safety Partnership (Safer Lewisham Partnership), a statutory board as prescribed in legislation.

21.2 The general feedback from partners was that the reductions in service were acceptable based on the financial position. Police specifically noted concerns about the reductions as a strong partnership and delivery model has been developed over the past years which has led to significant reductions in crime and anti social behaviour.

- 21.3 They could see the merits in the proposed model, they supported the changes to out of hours noise nuisance with the note that the police service themselves would be reduced significantly over the coming 3 years.
- 21.4 They were keen to develop further joint ways of working and welcomed the proactive geographical action model, as this would enable police to allocate resources to support activity.
- 21.5 Discussions have also been had with senior officers within the Council where services affected by this reorganisation interface or interact, such as with public health and planning.
- 21.6 All officers recognise the reductions and changes in the staffing and model will impact on their areas and outcomes, but are keen for further discussions to try and find a joint solution to enabling delivery as best as is possible in the current climate.
- 21.7 These senior officers are supportive of the model recognising that greater joined up working and ongoing regular monitoring of the new delivery model will be required to ensure services are meeting statutory requirements.
- 21.8 There is no requirement to consult with the public nor more widely with government bodies, but it was deemed prudent to discuss the proposals with those mentioned above to ascertain any local issues or impact.

22. Legal implications

- 22.1 The statutory nature of many of the activities delivered by the services outlined in this report is recognised. At the heart of the proposed new delivery model is the need to ensure that the Council's statutory obligations are addressed but that we are realistic about what is really needed, about what we can deliver and that enforcement action is targeted and proportionate to the circumstances. In most cases the level of statutory activity required is not explicitly set out which implies that it is for the Council to exercise their discretion on levels of local provision.

23. Financial implications

- 23.1 The proposals in this report are aimed at delivery of the £800k saving for the 15-16 financial year that was agreed as part of the Lewisham Future Programme-2015-16 Revenue Budget Savings Report which went to Mayor and Cabinet in September 2014. The saving of was agreed in principle subject to the relevant staff and public consultation. The savings options proposed have been developed to achieve the financial saving required whilst recognising that the proposed financial saving will mean a reduction and change to the current service delivery model. The potential redundancy costs that will arise from the service delivery changes have been agreed in principle by ER/VR panel.

24. Crime and disorder implications

- 24.1 A significant element of the proposals have a direct impact in crime and disorder. With reduction in service capacity there are likely to be elements of current provision which will not continue such as proactive crime prevention work.
- 24.2 The proposed model of enabling staff to be multi faceted in terms of enforcement gives the potential for officers to directly resolve issues using a wider range of provisions and powers that is currently the case.

25. Human Rights Act implications

- 25.1 There are no specific implications arising from this update.

26. Equal opportunities

- 26.1 The attached equalities analysis assessment (EAA) outlines the information on staffing as the current structures exist. A further EAA will be undertaken post reorganisation.

27. Environmental implications

- 27.1 There are implications in respect of environmental protection services and some aspects of public health and nuisance provision. Changes in the way these services will be delivered may have an impact on the environment. Close work with relevant local and national bodies in respect of these impacts will be required to ensure Lewisham's compliance and likely impact on residents into the future.

For further information please contact Geeta Subramaniam-Mooney, Head of Crime Reduction and Supporting People on Geeta.Subramaniam@lewisham.gov.uk

Appendix

Enforcement and Regulatory services Restructure First stage equalities analysis assessment

- 1 This document sets out the first stage for the equalities analysis assessment of the proposed restructure of Enforcement and Regulatory Services. The proposal is subject to consultation with staff and trades unions and so it will only be possible to complete the EAA once that process has completed, and when the proposed recruitment process to the new roles is complete. Until that point it will not be possible to measure the impact of the new structure on particular protected characteristics.
- 2 However, this initial assessment suggests that the equalities impact may be low.
- 3 Subject to the views of affected staff and the trades unions, the proposed restructure will see 64.3 FTE deleted and 39 FTE new posts will be created in the proposed structure. Of the 64.3 FTE's in the current structure, 8 FTE posts are vacant, one of which is filled temporarily. The number of FTE therefore which are proposed to be deleted are 25.3 FTE's (of which eight are vacant). and to create six new roles which will be subject to a selection exercise, ring-fenced to affected staff in the first instance. The Council's HR policies will apply to that selection process, ensuring that this is fair and transparent.
- 4 Of the 57 posts that are affected by the proposed restructure (excluding the vacant posts), the breakdown by grade is as follows:
 - 5 posts (9%) are for staff graded from PO6 and above
 - 49 posts (86%) are for staff graded from P01 – P05
 - 3 posts (5%) are for staff graded SO1 and below.
- 5 The current composition of the workforce in posts that are proposed to be affected by the restructure is as follows.
- 6 By age:
 - 2% are aged 21-25
 - 9% are aged 26-30
 - 16% are aged 31 – 35
 - 18% are aged 36-40

- 12% are aged 41-45
- 12% are aged 46-50
- 19% are aged 51 – 55
- 12% are aged 55 +

7 By gender:

- 47% are women
- 53% are men

8 By ethnicity (where staff have chosen to provide this information)

- 26% are BME
- 69% are White.

9 By disability (where staff have chosen to declare their status)

- 9% are disabled
- 89% are not disabled.

10 By sexual orientation:

- 68% either chose not to declare this information or the information is unknown
- 4% are Gay/lesbian
- 28% are straight/heterosexual

11 As previously, the Council's HR policies will ensure fair and equitable recruitment to the new posts for staff who choose to apply. As such, there are no reasons for assuming that these classifications will vary significantly as a result of the reorganisation. The initial EAA suggests that there will be low/nil impact as a result of the restructure across gender, ethnicity, age and disability.