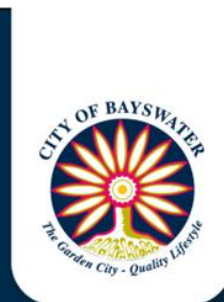




City of Bayswater



SEED Report

Compliance

December 2017



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Approval

This document is accepted as an approved product of the Service Review project:

Name	Title	Signature	Date
Andrew Brien CEO / Sponsor			

Consultation

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CONTENTS PAGE

1. Executive Summary	2
2. Purpose	3
2.1. Aim	3
2.2. Scope	3
3. Background	3
4. Methodology	4
5. Strategic Intent.....	4
5.1. Strategic Intent for the Service Review	5
5.2. Future Operating Environment.....	5
6. Key Themes.....	6
7. COMPLIANCE Function.....	7
7.1. Service Delivery Model	7
7.1.1. Services Delivered	7
7.1.2. Customer Perception of Service.....	7
8. Benchmarking.....	8
9. Issues	10
10. Solutions.....	11
11. Recommendations	12
12. Appendices.....	15
12.1. Appendix 1 - Service Statement	15
12.2. Appendix 2 - Summary of Issues.....	16
12.3. Appendix 3 - Solutions Identified	17





1. EXECUTIVE SUMMARY

The SEED Project was formed to evaluate the City's service excellence through a process of discovery; our processes and outputs, their benefits and/or issues and opportunities to improve our services to the betterment of staff and the community. Compliance is one of the areas for review which will be explored in this report.

The approach used throughout the review process was to gather existing information relating to the Compliance function, analyse the sub services, benchmark these sub services against best practice organisations, identify inefficiencies and provide recommendations. Through this process, a number of key themes related to inefficiency were identified across a majority of service areas including:

- Training;
- Use of Technology;
- Communication and Knowledge; and
- Customer Service

The recommendations for the future delivery of Compliance have been centred around the Council's decision making criteria set out in the City of Bayswater Strategic Community Plan 2017-2027 and include:

- Investigate and implement the ability for all Compliance Officers and others undertaking field compliance to undertake electronic inspections in the field.
- Investigate and implement electronic tracking, management, responses etc. in relation to customer complaints utilising a consistent approach across the City.
- Investigate and implement:
 - electronic reminders (SMS) for dog and cat registrations after initial registration process;
 - promoting the registration and microchipping of animals by using incentives and community campaigns; and
 - electronic promotion of the services provided by Ranger and Security Services.
- Investigate parking restrictions, paid parking and conduct parking education campaigns within the City of Bayswater.
- Create a Compliance Enforcement management practice to ensure a consistent approach throughout the City's Service areas, when pursuing compliance, enforcement action and appeals.



2. PURPOSE

2.1. Aim

The aim of this document is to:

- Report on the findings of the review of compliance;
- Present conclusions based on quantitative and qualitative data obtained; and
- Provide recommendations on the options for a structural change under a new operating model.

2.2. Scope

The scope of the review includes:

- The end to end compliance system;
- The Compliance function in the City of Bayswater;
- All City of Bayswater functions who are a stakeholder in compliance;
- External environmental factors; and
- Benchmarking of services and structures against other similar organisations.

3. BACKGROUND

The Chief Executive Officer and Project Sponsor, Andrew Brien, provided an Organisational Assessment Report for Council in July 2017. As part of this assessment, he provided high level observations of the organisation and proposed a number of key tasks and performance indicators to improved outcomes. These recommendations were adopted by council. One of those recommendations was to undertake a Service Review Project. Service reviews are undertaken for a number of reasons including:

"Service reviews are vital processes to ensure local government services are:

- appropriate – that is, services meet current community needs and wants, and can be adapted to meet future needs and wants;
- effective – that is, councils deliver targeted, better quality services in new ways; and
- efficient – that is, councils improve resource use (people, materials, plant and equipment, infrastructure, buildings) and redirect savings to finance new or improved services.

The key benefits of service delivery reviews include:

- alignment of services with community needs and a more engaged community;
- improved quality of service provision;
- cost savings and potential income generation in some cases;
- increased efficiency and refocusing of often limited resources;
- partnerships and networks with other local governments and service providers;
- increased capacity of staff to respond to the changing needs of the community;
- staff who work more cooperatively across departments; and
- a more systematic approach to understanding future community needs."

The Australian Centre of Excellence for Local Government has produced a comprehensive Service Delivery Review Manual which has formed the basis of this internal Service Review project. The outcomes of the Service Review Project will help drive changes in the development of the City's budget and the Corporate Business Plan going forward and inform a new organisational alignment.



This 12 month project, seconding qualified and experienced internal staff, has been focussed on building trust and confidence in the process and providing opportunities for input from all staff regardless of position or work location. The intention has been to work collaboratively to identify ways to create a better Bayswater.

The review process and recommendations are based around Council's decision making criteria set out in the City of Bayswater Strategic Community Plan 2017-2027:

Strategic Direction	Does it fit with our strategic direction as outlined in the Strategic Community Plan?
Community Views	What does the community think? Were they provided with adequate information when giving feedback?
Equity	Are we ensuring equitable distribution of benefits in the community? Does the option consider and balance current and future community needs?
Risks	What types of risks are involved? Does it fit within our risk tolerance level?
Costs	How well does the option fit with the Long Term Financial Plan? What is required to manage the whole of life costs of the asset / project / service?

4. METHODOLOGY

The approach and methodology used to conduct the review is as follows:

- A desktop review of documentation held within compliance including policies, procedures, structures and responsibilities;
- Identification of subservices provided within compliance;
- Collection of information about each subservice;
- Review of services to identify levels of service and mode of delivery options;
- Benchmarking of services against other similar organisations;
- Identification of issues including the need for the service, service provision gaps, and those services not delivering corporate value;
- Interview with Managers and super users to gain an understanding of the customer requirements;
- Mapping of current state processes to identify improvement opportunities;
- Solutions workshops conducted with all interested staff;
- Personal interviews with staff offering ideas and solutions;
- Assessment of the solutions and options for change;
- Identification of solutions that could be quickly implemented in collaboration with service owners;
- Documentation of the findings and recommendations;
- Review of findings and recommendations by a reference panel; and
- Submission to ELT for endorsement.

5. STRATEGIC INTENT

An assessment of the strategic intentions for the Service Review and compliance gave guidance on the approach and options for change. The strategic intent is assessed in this section.



5.1. Strategic Intent for the Service Review

The CEO's vision for the Service Review is to ensure that all the services, activities and projects that are undertaken are done so in an efficient and effective manner and take into account whole of life costs and performance.

The issue of Red Tape Reduction was raised in relation to a number of service reviews and there is a clear opportunity to automate more processes. Whilst there has been some work undertaken in this space, the lack of a coordinated approach across the entire organisation needs to be addressed in a consistent manner. This should be addressed through the Service Review project.

The Service Review requires the following outcomes:

- Systems and services that:
 - support a safe work environment;
 - are customer centred;
 - are designed for ongoing improvement and agility;
 - have defined value and efficiency improvements are able to be measured;
 - meet the City's obligations and expectations;
 - are the most efficient and effective use of our available resources;
- An organisational structure that best meets the requirements of the Strategic Community Plan (SCP);
- Staff actively engaged in a positive change program; and
- Collaborate with the City's customers as a means to achieve a better outcome.

5.2. Future Operating Environment

In addition to the strategic intention, it is essential to plan for the future environment that compliance will need to operate within. The following are the key environmental factors that will impact upon a compliance system in future:

- Sector wide collaboration delivering value for councils and communities.
- Increased regulation and compliance expectations from the community and other tiers of government.
- Concerns where rules are inconsistently applied and enforced.
- Push for red tape reduction - reducing paper based compliance, speedier resolution.
- Negotiated outcomes to avoid costly litigation/appeal processes.



6. KEY THEMES

A number of key themes related to inefficiency have been identified across a majority of service areas. These key themes have developed over time and contribute to the existing culture of the City of Bayswater. In order to influence the culture and embed efficiency and innovation in every day operations, a coordinated focus on outcomes is required.

Element	Current	Future
Training	<p>Training is mostly decentralised and reactive to individual and departmental cultural requirements.</p> <p>Training attendance varies from moderate to poor.</p> <p>Centralised induction of new staff is standardised but inconsistent at a department level.</p>	<p>Training is coordinated to facilitate strategic direction balanced with departmental needs.</p> <p>Procedures and processes are documented to allow effective training, consistency, accountability and risk management.</p>
Use of Technology	<p>City core systems have significantly greater functionality than is currently being employed. This functionality has either been turned off or abandoned part way through the implementation phase.</p> <p>Manual process work arounds have been implemented to bypass unwanted, misunderstood or imperfect automated systems.</p> <p>Departments undertaking similar processes utilise technology in different ways.</p>	<p>City processes are engineered to maximise the functionality of existing systems.</p> <p>Existing and new systems are reviewed to assess the fit for the requirements of the City.</p> <p>Processes are "Digital by default" with the aim of reducing duplication of tasks and allowing easier customer interaction.</p>
Communication and knowledge within the organisation	<p>Communication between departments and Council locations within the City is inconsistent, can often be misunderstood, misinterpreted or ignored.</p> <p>Knowledge of business processes and procedures are not documented adequately. Knowledge is lost when an officer leaves.</p> <p>Manual work arounds and inefficient, undocumented practices are transferred to inductees.</p> <p>Feedback from customers on wants, needs and perceived service quality is not generally sought.</p>	<p>Communication is clear and open with proactive stakeholder identification and effective channels formalised.</p> <p>Processes and procedures are mapped and documented centrally to allow transparency, more effective induction and easier identification / mitigation of risk.</p> <p>Customer feedback is sought for benchmarking and performance feedback and is used to guide ongoing service review.</p> <p>Council is provided with information and support to enable informed decision making.</p>
Customer Service	<p>Delivery can focus on what is easiest for the business rather than what is best for the community.</p> <p>Customer service standards and delivery varies throughout the organisation.</p> <p>Knowledge of key functions of the various services that the City provides (internal and external) is inconsistent.</p>	<p>Consult with the community to review and update service offerings that adapt to current and future needs.</p> <p>Accountable to consistent customer service standards throughout the organisation.</p> <p>An informed workforce with the necessary resources to efficiently respond to issues and direct enquiries.</p>



7. COMPLIANCE FUNCTION

7.1. Service Delivery Model

Compliance are linked to the Strategic Community plan through the outcome L1 Accountable and good governance and B3 Quality Build Environment and the below strategies:

- L1.1 Integrate all planning, resources and reporting in accordance with best practice and statutory requirements
- L1.2 Ensure policies, procedures and practices are effective
- B3.1 Develop plans, policies and guidelines for quality built form

The table below provides a summary of the sub services, their outputs and related resource utilisation. Further information can be found in the Service Statement attached in section 12.1

7.1.1. Services Delivered

Sub Service	Degree of Discretion	Outputs	FTE	Link to SCP Strategies
Environmental Health	Statutory	Statutory premises - inspections, complaints	2.5	L1.1, L1.2, B3.1
Statutory Planning*	Statutory	Inspections from complaints	1 (shared)	L1.1
Ranger and Security Service	Statutory	Parking, trading in thoroughfares, seasonal campaigns, complaints	0.6 (parking) 18.76	L1.1, L1.2
Statutory Building*	Statutory	Statutory pool inspections, dangerous buildings, dividing fences, complaints	1	L1.1, B3.1

7.1.2. Customer Perception of Service

- The City receives negative feedback from residents and ratepayers when we fail to enforce rules and laws such as parking restrictions, obstructions to footpaths, trading in public places, etc.
- Benchmarking Catalyse community perceptions survey undertaken in March 2016 showed the following results:
 - Management of food, health, noise and pollution - the City was rated 56%, 7% above the industry average of 49% in 2016. In 2012 the City score for these activities was 55%, an increase in 1% over the four year period.
 - Planning and Building - the City was rated 40%, 1% above the industry average of 39% in 2016. In 2012, the City's score for these activities was 44%, a decrease in 4% over the four year period.
 - In the Catalyse survey, planning and building was listed as a priority by all residents.



8. BENCHMARKING

A benchmarking activity was undertaken to review the delivery of the services provided by compliance. By comparing the City of Bayswater's compliance processes and performance metrics against industry best practice, it allows us to understand and evaluate the current position of the organisation

When lessons learned from a benchmarking exercise are applied appropriately, they facilitate improved performance in critical functions within an organisation or in key areas of the business.

The benchmarking process has attempted to cover the key aspects of the compliance function. The process has involved benchmarking the City of Bayswater against WA local governments that were identified as being best practice in their field.

The organisations contacted were as follows:

Statutory inspections:

- City of Belmont
- City of Stirling; and
- Town of Victoria Park

Ranger and Security Services:

- City of Swan; and
- Town of Victoria Park

The table below provides a summary of the sub services and their assessment against the organisations that were able to provide data:

Sub service / Point of Reference	Assessment
Statutory Inspections	
Swimming pool inspections - recorded in the field electronically or are details entered back in the office?	Only City of Stirling undertakes this.
Inspection appointments - any issues or concerns with the hours of availability and or capacity of the inspector?	All three LG's have no concerns or issues and allowances can be made for before/after office hours appointments if required.
Are any type of public information events or sessions held?	The City of Stirling currently provides leaflets and brochures and conducts radio advertising at the beginning of summer
What type of approach is taken with complaints and or breaches? A softly softly approach or more regulatory/enforcement approach?	Non-life threatening - more facilitative approach with deadlines - 14-28 days. Major risk - 24 hour compliance and when necessary breaches may be escalated to prosecution.
Ranger and Security Services	
After animal registration renewals process is completed, is there a follow up process in place for non-payment or no reply?	Only City of Swan undertakes a reminder and follow up process - via mobile phone.
Is a door knock or campaign undertaken to identify unregistered animals?	No LG's undertake this process.
Are any type of public campaigns, events or information sessions undertaken?	Both City of Swan and Town of Victoria Park undertake events and community information sessions e.g. microchipping events, support for



Sub service / Point of Reference	Assessment
	RSPCA's Million Paws Walk. City of Swan strongly promotes lifetime animal registrations by way of incentive/ prize draw.

The key findings from the activity were as follows:

- Recording of swimming pool inspections can be undertaken in the field.
- Compliance approach with statutory inspections is similar with those LG's benchmarked.
- Information sessions, public campaigns, events and follow-up processes undertaken by LG's benchmarked are not consistent.

The above findings have been taken into consideration when providing recommendations.





9. ISSUES

A number of issues were identified by staff through the review process. These perceived issues are summarised in the table below. Further details are included in appendix 2

Sub Service	Issue	Element
Statutory Inspections	<ul style="list-style-type: none"> No consistent or accessible central storage of inspection records across departments. Confusion as to which department is responsible for litter control and trading in thoroughfares/public places. No follow up to ensure compliance unless there is a complaint. Swimming pool data/information is not always reliable, is paper based along with swimming pool inspections. Legislation and policy change in the last 5 years appears to be a transfer of responsibility from state to local government. 	Training Use of Technology Communication and knowledge
Complaints	<ul style="list-style-type: none"> No consistent or accessible central storage of customer complaint records across departments/City. Large number of complaints received by the City in compliance areas annually. Complaints acknowledgement is paper based. No consistent customer relationship with complaints - complainant may speak with additional officers to seek action on the same matter. No tracking or reporting on the timeframes that complaints are processed. Lack of enforcement in public places due to lack of training, confusion or confidence. Customer focus - work with the customer on complaint/compliance which takes time. The City doesn't have a consistent approach to enforcement/compliance based on risk and no guidelines to help maintain this consistency. 	Training Use of Technology Communication and knowledge
Seasonal campaigns	<ul style="list-style-type: none"> Only 50% of dogs are registered in the City. New pets to the City may only be discovered due to an offence occurring or a complaint is received. 	Communication and knowledge



10. SOLUTIONS

A number of organisation-wide 'Solutions Workshops' were held to identify possible solutions to issues identified during the review process. Facilitated brainstorming sessions were held to give all staff the opportunity to contribute and assist in solving problems in a constructive way.

The following rules were established to support the effective running of the workshop:

- There are no wrong answers or ideas;
- Everyone's view is valuable;
- Facilitators are not to edit responses;
- No defending services or arguing; and
- Try to make ideas practical

All ideas were captured and compiled into one list (refer to section 12.3) and shared on the City's 'Engage Bayswater' page for all staff to view.

The 'Solutions Workshop' has assisted in recommending solutions and issues that may have been missed during the review process. These solutions have assisted in forming the recommendations that have been suggested under a new service delivery model for the compliance function.

Through this process, a number of 'quick wins' were identified that could be implemented with minimal resource requirements, prior to the final review recommendations. A quick win was defined as an opportunity that could be implemented within two months. Quick wins for compliance were identified as:

- Work together to tackle compliance issues - share policy and legislation changes, knowledge and trends.
- Use common templates/cheat sheets - outlining clear guidelines of compliance and why we do it - less warnings, more infringements
- Create a compliance complaint form for completing by the complainant that incorporates the: who, address, impact, picture etc. and statement that the complainant is willing to be a witness in court.
- Inspections for street lights - educate staff and public to approach Western Power in the first instance.

The executive and management teams were presented with these quick wins and accountability for implementation was established. The quick wins are either in the process of being implemented or have now been implemented into operations.



11. RECOMMENDATIONS

The recommended solutions for priority implementation for compliance services are:

Recommendation 1		Investigate and implement the ability for all Compliance Officers and others undertaking field compliance to undertake electronic inspections in the field.
Benefits	Red Tape Reduction	Reduce double handling of inspection process and can be emailed rather than paper based reports sent.
	Customer Focus	Increase the quality of officer time and improved inspection outcomes in the field.
	Accountability and Transparency	Ability to capture accurately and consistently in the field to support infringements and complaints.
	Other	Potential ability to check history and other related information whilst on site
Strategic Direction		L2.2 Provide quality customer services to the community
Community Views		The community wants value for money from its Rates and expects efficient service delivery
Equity		Consider current and future community needs
Risks	of implementing	need to ensure integration with other systems
	of not implementing	Nothing changes and the City does not provide service excellence
Costs		Cost of technology hardware and software, training of staff
Timeframes for Delivery		6 - 12 months
Resource Implications		Free up some officer time - less time spent in the office.

Recommendation 2		Investigate and implement electronic tracking, management, responses etc. in relation to customer complaints utilising a consistent approach across the City.
Benefits	Red Tape Reduction	Reduce transferring of customer complaints around the organisation.
	Customer Focus	This will allow for ease of retrieval, sharing of information for officers and provide a better customer relationship.
	Accountability and Transparency	Increased transparency of process and outcomes for customer. Consistent corporate benefit from centralised documentation of complaints and resolutions.
	Other	Potential for electronic follow up to customers to track progress.
Strategic Direction		L2.2 Provide quality customer services to the community
Community Views		The community wants value for money from its Rates and expects efficient service delivery
Equity		Consider current and future community needs
Risks	of implementing	Nil
	of not implementing	Nothing changes and the City does not provide service excellence
Costs		Investigation either by in house or contract resources, using existing technology and training to implement.
Timeframes for Delivery		24 - 36 months
Resource Implications		No additional resource implications



Recommendation 3		Investigate and implement: <ol style="list-style-type: none"> 1. electronic reminders (SMS) for dog and cat registrations after initial registration process; 2. promoting the registration and microchipping of animals by using incentives and community campaigns; and 3. electronic promotion of the services provided by Ranger and Security Services.
Benefits	Red Tape Reduction	Reduce paper based reminders, postage and time spent.
	Customer Focus	Ensures that the City provides a platform for proactive and community based approach.
	Accountability and Transparency	Ensures follow-up to existing registrations.
	Other	This may provide additional income for the City.
Strategic Direction		C1.3 Deliver a safety service which builds a strong sense of community safety.
Community Views		The community wants value for money from its Rates and expects efficient service delivery
Equity		To ensure that benefits to the community and the City are balanced
Risks	of implementing	Nil
	of not implementing	Nothing changes and the City does not provide a service excellence
Costs		Cost of software and training of staff
Timeframes for Delivery		12 - 18 months
Resource Implications		Should increase income from renewed registrations

Recommendation 4		Investigate parking restrictions, paid parking and conduct parking education campaigns within the City of Bayswater.
Benefits	Red Tape Reduction	Increase availability of parking where most needed.
	Customer Focus	Importantly this will reduce resident conflict and concern about illegal parking, parking over footpaths and overstaying in congested areas.
	Accountability and Transparency	Clarity and consistency of application of parking regulations.
	Other	This should be cost neutral to manage - being funded directly through income from registrations and infringements
Strategic Direction		B2 A connected community with sustainable and well maintained transport
Community Views		The community expects that the City will enforce parking restrictions in a cost effective manner.
Equity		To ensure that all areas of the City receive appropriate patrols and outcomes.
Risks	of implementing	Nil
	of not implementing	Nothing changes and the City does not provide service excellence
Costs		Cost neutral - appointment of at least one additional dedicated parking control officer to be offset by income from infringements and registered car spaces.
Timeframes for Delivery		3 - 6 months
Resource Implications		Vehicle, uniform and equipment



Recommendation 5		Create a Compliance Enforcement management practice to ensure a consistent approach throughout the City's Service areas, when pursuing compliance, enforcement action and appeals.
Benefits	Red Tape Reduction	Will help provide a simpler, streamlined approach to compliance and enforcement, which is more standardised across the organisation. This may help to remove unnecessary measures that may exist in some service areas.
	Customer Focus	Assists the members of the public and staff in understanding the compliance process and how compliance issues are handled.
	Accountability and Transparency	Ensures transparency, procedural fairness and consistency in the application of compliance, enforcement and the appeals process
	Other	Reflects the City's responsibilities under relevant Acts, Regulations and Policies.
Strategic Direction		L1 Accountable and good governance
Community Views		The community expects that the City will pursue compliance, enforcement and appeals in a reasonable and cost effective manner.
Equity		To ensure that the community is treated fairly and consistently in all circumstances.
Risks	of implementing	Nil
	of not implementing	Nothing changes and the City does not provide service excellence
Costs		Cost neutral
Timeframes for Delivery		3 - 6 months
Resource Implications		Staff time developing the policy and monitoring for accountability





12. APPENDICES

12.1. Appendix 1 - Service Statement

Service Statement - Compliance



<i>Department</i>	<i>Environmental Health Statutory Planning Ranger and Security Service Statutory Building</i>	<i>Directorate</i>	<i>Various</i>
<i>Service Custodian</i>	<i>Various</i>	<i>Internal or External</i>	<i>External</i>
<i>Degree of Discretion</i>	<i>Statutory</i>	<i>Method of Delivery</i>	<i>Internal</i>

- What the service does*
- Compliance activities provided throughout the organisation under the legislation and policies listed below.
 - Primarily this compliance takes three forms, statutory inspections, responses to complaints and seasonal campaigns.

Link to Strategic plan

Outcome

L1. Accountable and good governance.

B3. Quality built environment

Strategies

L1.1 Integrate all planning, resources and reporting in accordance with best practice and statutory requirements
L1.2 Ensure policies, procedures and practices are effective

B3.1 Develop plans, policies and guidelines for quality built form

Relevant Legislation/Policies

Internal

Activities on Thoroughfares and Trading in Thoroughfares and Public Places Local Law 2008
Parking and Parking Facilities Local Law 2016
Health Local Law
Fencing and Floodlighting Local Law October 2007
Tobacco Control Act 2006
Planning and Development Act 2005
Planning and Development Services Policies

Codes of Practice

Australia New Zealand Food Standards Code
Grey Water Code of Practice
Aerobic Treatment Unit Code of Practice

Legislation

Local Government Act 1995
Health Act 1911
Health (Miscellaneous Provisions) Act 1911
Public Health Act 2016
Food Act 2008
Environmental Protection Act 1986
Contaminated Sites Act 2003
Waste Avoidance and Resource Recovery Act 2007
Litter Act 1979
Dog Act 1976
Cat Act 2011
Building Act 2011
Building Act Regulations 2012
Dividing Fences Act 1961
Local Government (Uniform Local Provisions) amended regulations 2013 - Regulation 3

Aquatic Facilities Code of Practice
Skin Penetration/Beauty Therapy
Code of Practice
Residential Design Codes - R Codes

Liquor Control Act 1988
Gaming and Wagering Act 1987
Bush Fire Act

Customer Definition

Residents, business owners and operators, commercial business', internal
officers, Councillors, developers, builders, Building Commission, pool owners,
other State Government departments

Sub Services

Statutory Inspections				
<i>Outputs</i>	<i>Service Standards/KPI's</i>	<i>Community's view of quality of service</i>	<i>Community's view of importance of service</i>	<i>Customer demographic</i>
Environmental Health				
Statutory Premises Inspections -	<ul style="list-style-type: none"> • Food Business - High Risk - 3 x pa, Medium Risk 2 x pa, Low Risk 1 x every 2 years • Public Buildings - High Risk - 3 x pa, Medium Risk, 1 x pa, Low Risk 1 x every 5 years • Lodging House 1 x pa • Skin Penetration - High Risk 1 x pa • Caravan Park - 1 x pa • Aquatic facilities water sampling - 1 x p month • Industrial premises - High Risk 1 x every 2 years • No scheduled inspections for hairdressers, morgues or offensive trades. 	Through discussions with customers, they have mentioned that they appreciate meeting with EH staff to discuss their intentions and the requirements prior to undertaking the works.	Legislative requirement. Expectation from the community that food businesses meet health standards.	Business owners and their contractors. Planning/ Building.
Statutory Planning				
Compliance Inspections	<ul style="list-style-type: none"> • No statutory inspections currently, but to be introduced by the Building Commission 	Varies according to outcome		
Ranger & Security Service				
	<ul style="list-style-type: none"> • Meet requirements of various Acts, regulations and local laws and ensure compliance within the community. • Reactive inspections based on enquiry 	Varies	High	General community, other LGAs
Statutory Building				
Pools	<ul style="list-style-type: none"> • Inspected every 4 years 		Legislative requirement	Residents, commercial companies & Dept of Housing
Historic Performance Data				

Environmental Health

- Statutory inspections of establishments - public buildings, food premises, hairdressing. Guidelines and schedule dictate how frequently checks are performed
- If found to be non-compliant - verbal or written warnings - work orders, improvement orders, prohibitions, infringements
- Most issued by the officer whilst on site - confirm with a letter
- Improvement orders and infringement notices can be issued by the officer at the time of inspection
- The Manager and Coordinator are only authorised to withdraw infringements or grant extensions of time
- Infringements - timeframes offered for compliance - rare that these go to prosecution
- Officer's undertake follow up inspections to ensure compliance

Ranger and Security ServiceParking

- Zoned areas that are patrolled for parking compliance - priorities for patrol determined by current staff member, and usually in areas where we receive complaints
- 1 x 0.6FTE but an additional parking officer is being recruited.
- Health is aware of illegal parking in laneways that obstruct rubbish trucks and request Ranger patrols in these areas for an intensive period in response.

Animal Registrations / Control

- Reactive

Bushfire Season

- Processes in place, improvements made in the 2016/17 season. This is being built on in the 2017/18 season.

Statutory Building

Swimming pool inspections

New pools:

- Building application is received and assessed by building surveyor and application provided to Swimming Pool Compliance Officer (SPCO) for entering into register database for the property and this is recorded in P&R system. No input into type of pool or inspection date entered at this point.
- SPCO runs a report from P&R system every 2 months to identify non inspection dates for properties with pools, which provides a list of pools that have been created but don't have an inspection date.
- SPCO will check city spatial for pool build or if out on the road and close to properties, will also conduct a physical check.
- Most times SPCO is not notified in writing that the pool is built, physical inspections provide proof of build.
- A letter/report advising owner that the City is aware that the pool is built and left at the property - this can also be done with a follow up phone call -

next inspection date set with owner. The report obtains status of the pool condition and any conditions that are still required to be met. This is paper based and completed on site.

- SPCO diaries the next inspection date in work diary (paper based) and P&R is updated to reflect status of pool on laptop provided in the field.
- Office copy of report (paper based) is filed in folder and when time permitting scanned and registered into ECM.

Existing pools:

- SPCO runs a report for all existing pools that are due for inspection from P&R and then a letter are sent to pool owners for them to contact SPCO to arrange for appointment for inspection. Letters are produced electronically in template form with electronic signature and then posted.
- Appointments are booked with owners/occupiers - Monday to Friday between 8am - 4pm. Some allowances are made outside of those hours, no weekend work.
- If no response from owner/occupier in relation to booking pool inspection, SPCO cold calls too book inspection, if no contact, SPCO attends site and leaves business card in their front door (this process assists with noncompliance). Officer cannot inspect pool without owner/occupier being present or permission being granted.
- Pool inspection takes place with paper inspection book. The report obtains status of the pool condition and any conditions that are still required to be met. This is paper based and completed on site.
- SPCO diaries the next inspection date in work diary (paper based) and P&R is updated to reflect status of pool on laptop provided in the field.
- Office copy of report (paper based) is filed in folder and when time permitting scanned and registered into ECM.
- If the SPCO cannot get hold of owner/occupier through the above, a warrant of entry is required to be action. This involves input from Police, JP, possibly locksmith to obtain entry for pool inspection.
- Non-compliance with pool regulations - minor fault may get 14 or 28 days to rectify. Major risk to others may only have 24 hours to comply.
- If noncompliance occurs, SPCO will re-visit site or give owner call and will work with them to achieve compliance. However, the SPCO does have the ability to infringe, however preference is that working with the owner/occupant takes place first.
- If there are issues with water quality (smell or larvae present, advice is provided). SCPO will re-visit first and provide opportunity to fix problem and if not will refer to Health.
- Compliance of pools relates to the time that the pool was built. No enforcement can be actioned if the house or property has been upgraded thereafter.
- SCPO liaises with rates to advise new pool build and or removal of old pool to ensure charges are raised in relation to inspection fees. This takes place 2 - 3 times per year. Pool charges are sent to owners with their rates notices.
- The WA Ombudsman is about to report on drownings since 2006, which will probably lead to changes to inspection requirements
- The City has been liaising with RLSSWA re: an improved system of inspections - no follow up from City as this can be done on P&R.
- Information about pool inspections and requirements on the website.

Complaints				
<i>Outputs</i>	<i>Service Standards/KPI's</i>	<i>Community's view of quality of service</i>	<i>Community's view of importance of service</i>	<i>Customer demographic</i>
Environmental Health				
Inspections from complaints	<ul style="list-style-type: none"> 1450 compliance matters attended to (2016/17) 			
Statutory Planning	Year to October 2017			
Inspections from complaints	<ul style="list-style-type: none"> Statutory Planning 77 resolved, 71 ongoing, 105 new 			
Ranger and Security				
Parking -	<ul style="list-style-type: none"> overstaying, blocking thoroughfares (footpaths) more pronounced near public transport, shopping district and areas of high density due to lack of parking availability 	Low	High	Varied
Trading in thoroughfares -	<ul style="list-style-type: none"> busking, stall holders, storage on verges 	Low	Low	Varied
Bushfire Season	<ul style="list-style-type: none"> inner city don't see as relevant 	Low	Low	Vacant land owners
Other	<ul style="list-style-type: none"> Antisocial behaviour, rough sleepers, Noise complaints, Litter, Animals - dogs & cats 	various	various	Varied
Statutory Building				
Dangerous, buildings/structures, unauthorised use of a building	<ul style="list-style-type: none"> Statutory Building 104 resolved, 103 ongoing, 134 new 			
Dividing fences -	<ul style="list-style-type: none"> where retaining walls form part of the fence structure and involvement due to Fencing and Floodlighting Local Law 			
Other complaints	<ul style="list-style-type: none"> Storage of building materials on verges, Retaining wall and fill issues, Commencement of building works, 			

Demolitions and Storage of building materials on verges

Historic Performance Data

Environmental Health

- Verbal and written complaints are received - written request supports officer's powers i.e. entry and enforcement action
- Serious verbal complaints are acted on immediately i.e. asbestos, dust, sewerage spills
- Received by Admin Officer usually, but sometimes to EH Officer direct
- Tasked to designated compliance officers within Health - based on workload and officer availability, not on geographic areas
- Visit the site, explore the issues within 24-48 hours depending on seriousness and workload
- Work order can be issued on the spot
- Follow up letter issued, depending on nature of the issue. Date for compliance can range from immediate to several months
- SAT appeal timeframe is 28 days. For less serious matters a timeframe of at least 30 days is given to align with the SAT timeframe and help prevent complications
- Respond by email, but formal letters posted. Logged in ECM. All standard mail except certain Local Government or Health Notices, which may be sent by registered post and at times hand delivered, to ensure correct service of the notice. This is based upon legal advice and prevents complications if matters proceeds to court or SAT.

Statutory Planning and Statutory Building

- Risk categories for the compliance matters have been developed. Matters of a high risk nature are investigated as a high priority. Examples of the risk categories are below:

Risk	Example of Compliance Matters
High	Lodging houses, brothels, major unauthorised building works and uses causing major concern, dangerous buildings/structures, unauthorised commencement of building work and demolition. Swimming Pools.
Medium	Unauthorised uses/development, retaining wall and fill issues. Protection of street trees.
Low	Fences, patios, stormwater disposal, on site vehicle parking, signs and storage of building material on verges.

- The City has created a streamlined recording and reporting system for all new compliance matters. The system has been created within the City's current Property and Rating system, and new workflows and templates have been incorporated into the system that directly relate to the compliance investigation process. In late January 2016 the planning component of the new system was introduced and is now being used by Planning and

Development Services. The building component of the system was introduced on 16 February 2016 and is also operational. This new system will ensure all compliance matters are recorded consistently, tracked and reported on.

- An overview of the processing of a Development Compliance matter is outlined as follows:
 - The City receives approximately 24 building and planning compliance written enquiries a month via email and ECM tasks.
 - Every written enquiry is created in ECM, captured in an Excel tracking spreadsheet and a property file is created in the J drive under compliance.
 - An acknowledgement letter is required for every enquiry.
 - Each enquiry requires an investigation including a site visit, liaison with the owner and complainant, file searches, archive plan searches and plan and exploration of resolution options with the appropriate Planning and/or Building advice. Currently a softly, softly approach
 - Each enquiry potentially requires a 28 Day letter, 14 Day letter, 7 Day letter, Written Direction and/or Infringement Notice. Posted but can be emailed. Standard post
 - On completion of the enquiry the job is closed in ECM and the tracking spreadsheet. Excel spreadsheet available to anyone in Development Services (on shared drive)
 - Compliance achieved letter is sent to the person who made the enquiry and the person responsible for achieving compliance (Property owner and occupier if applicable).
 - All information is placed on the property file.
 - All correspondence is registered into ECM.
- Complaints can be referred from other departments - ie Health or Rangers
- If compliance not achieved then Manager and Director involved in deciding what further action is to be taken.
- Building order threatens with a significant fine - only for major/dangerous situations.
- Court also requires us to have exhausted all other avenues to resolve the issue
- Fine system under the Building Act is now harsh and takes into account previous performance - everyone is trying to resolve.
- Clarity required for who is required for which elements of compliance.
- Ranger and swimming pool matters are more clear cut than Planning matters where there is more discretion

Ranger and Security Service

Ranger Service

- Phone call received
- CRM raised
- Tasked to a Ranger to attend/Security Officer to attend
- Not quick to infringe - educate first - warning issued in the first instance usually
- Infringement issued always for parking on footpaths - safety concerns
- Vehicles causing a safety issue - not abandoned - towed immediately

- Other vehicles chalked and registered - towed after statutory period.
- Animals/dogs - dog attacks require more evidence and a Ranger investigation - interviews with complainants, etc, for prosecution
- Potential FOI for information about infringement process and evidence
- Verges have some crossover with Statutory Building, also pruning of trees on verges
- Other type of complaints - similar to Building/Health but more opportunities to infringe.

Litter Control

- Rangers act on complaints and general patrols.

Security Service

- 24/7 patrolling the streets - mandate to attend and infringe
- Evidence collected (photographic)
- Officer uploads photos, fills out infringement, checked by Senior Ranger - all paper based
- New mobile infringement device from next week for parking only initially.
- Admin inputs infringement into P&R

Seasonal Campaigns				
<i>Outputs</i>	<i>Service Standards/KPI's</i>	<i>Community's view of quality of service</i>	<i>Community's view of importance of service</i>	<i>Customer demographic</i>
Ranger and Security Service				
Bushfire Season	• Compliance between 1 November 2017-31 March 2018	Low	Low	Vacant property owners
Cat registration	• Compliance by 31 October	Low	Low	Pet owner
Dog registration	• Compliance by 31 October	Low	Low	Pet owner
Historic Performance Data				
Ranger Services				
<ul style="list-style-type: none"> • Annual process of undertaking cat and dog registrations and fire breaks • Kennel and catteries are processed on request/application basis 				

Sub Services	Actuals (\$000s) 2016/17				Delivery	
	Income	Expenditure	Net Cost of Service	Fixed vs. variable cost ratio	Staff numbers (FTE)	Service utilisation (annual)
Statutory Inspections						
Environmental Health	~\$135 (annual fee for registration)	Officer time (variable due to number of applications and complexity) \$244	~\$190 (for all applications/ services)	Depends on application numbers. Premises opening/ closing	2.5 (for all)	1000
Statutory Planning	\$28	\$59	\$31		1 shared	
Ranger and Security Service Parking	\$324	\$118	-\$206		0.6	
Statutory Building - swimming pool inspections	\$46	\$94	\$48		1 FTE	10 months - 1,100 physical inspections Additional 300 site visits with no access (cold calling)
Complaints						
Environmental Health - fines and penalties (varies)	\$27	\$488 sal	\$461	488/0 = 100%/0	~5	
Statutory Planning & Building	\$0	\$119	\$119	Fixed cost 72% Variable cost 28%	1 (shared)	239 written compliance enquiries to date
Ranger and Security Service - fines and penalties impounding fees / disposal legal cost recovered parking fines and penalties	\$434	\$990 (\$16 variable)	-\$556	974/990 =98% /1.6%	14 FTE R&S Officer's 3 x FTE Admin 1.76 Call centre	

<i>Seasonal Campaigns</i>			
Ranger and Security Service	<i>\$153</i>	<i>\$26</i>	<i>-\$127</i>
<p>Notes:</p> <p>Rangers advised that costings come from various accounts and haven't been able to break some of these down. Costs associated with</p> <ul style="list-style-type: none"> • Advertising / Gazetting of Local laws - <i>50% advertising/media allocated to all seasonal campaign,</i> • Infringement books - <i>100% printing allocated to complaints</i> • Production of notices and animal tags - <i>100% discs/notices allocated to seasonal campaign</i> • Legal expenses associated with legal advice, lodgement of fees with FER - <p>Ranger and Security salary split for complaints: -</p> <ul style="list-style-type: none"> • <i>25% Admin Office</i> • <i>10% Call Centre officer</i> • <i>90% Rangers and Security Officers</i> • <i>0% for seasonal campaigns</i> <p>Environmental Health salary split for:</p> <ul style="list-style-type: none"> • <i>50% complaints</i> • <i>25% statutory inspections</i> 			



12.2. Appendix 2 - Summary of Issues



Service Name	Compliance
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Sub services

[Statutory Inspections]	
Output	Issues
General	
	<ul style="list-style-type: none"> No consistent or accessible central storage of inspection records across departments.
Environmental Health	
	<ul style="list-style-type: none"> Electronic pen abandoned due to non-integration with internal system - IT investigating the use of an electronic device that will link P&R and ECM. Inspection data is held in various areas including Excel, hard copy property file and ECM.
Ranger and Security	
	<ul style="list-style-type: none"> Current registered animals are sent renewals, but no follow up in place for non-payment or no reply No regular campaign to identify households with unregistered animals. Lack of enforcement in public places due to lack of Ranger training, confusion over procedures and tolerances, and confidence to infringe. This may be linked back to animals not being registered in the first place. Confusion as to which department is responsible for litter control and trading in thoroughfares/public places. No follow up to ensure compliance unless there is a complaint.
Statutory Building	
	<ul style="list-style-type: none"> Current swimming pool inspections are behind schedule. Swimming pool inspection form needs to be reviewed and updated. Swimming pool inspections are not captured electronically in the field so require additional office based time to enter information into corporate systems. Data from the system on swimming pools is not always reliable, information is manually extracted and it is a paper based system. Swimming pool inspections - sometimes difficult to contact owners during work hours - inspections sometimes need to occur on weekends and after hours. There are different requirements dependent on when a pool was installed - requires checking with the approved plans. Also if the property has undertaken renovations, the pool may not be compliant. Swimming pool inspector position is difficult to fill.

[Complaints]	
Output	Issues
General	
	<ul style="list-style-type: none"> No tracking or reporting on the timeframes that complaints are processed within. No consistent customer relationship with complaints - e.g. CRM not being used throughout the City so there is no capacity for a customer to find out where the complaint is currently being considered/resolved. Review of delegations to Officer's is required for internal processes e.g. who can send letters and who needs to check before sending/ Customer feedback to the complainant - not all sections undertake this process
Environmental Health	

<ul style="list-style-type: none"> High workloads - currently 1 FTE vacant. Have advertised twice recently, but have not found a suitable candidate. Will readvertise at a later date. Both areas of compliance are growing due to increases in population and density. Certain issues are more prevalent at certain times of the year i.e. noise and asbestos issues tend to increase during the warmer months. Lot of policy and legislative change in the last 5 years, which appears to be a transfer of responsibility from state to local government There have been increased reporting requirements from State Government agencies which has increased the administrative burden.
Statutory Planning and Building
<ul style="list-style-type: none"> Every written enquiry is created in ECM, captured in an Excel tracking spreadsheet and a property file is created in the J drive under compliance. An acknowledgement letter is required for every enquiry. Currently a softly, softly approach to breaches in requirements - trying to reach negotiated outcomes with proponents rather than issue infringements/penalties/building orders. The Compliance Officer works without direct administrative assistance dealing with 290 written compliance matters received in 2017 alone and an additional 164 on-going. Manager and senior officer involvement throughout the process. No delegated authority to other officers. Process has room for improvement and improved systems - dedicated compliance role is still new for Bayswater. No teeth until all notifications ("we may do") have been exhausted and then progress to a building order. Recent experience in SAT - \$25,000 in legal fees each for City and respondent/builder, only a \$500 fine issued. Complainant often phones 3 or 4 people in the City to seek action on the same matter Even if at full staffing there is a backlog of most work - also resource/IT dependent on increasing outputs. Clarity required for who is required for which element of compliance The compliance officer position is also difficult to maintain due to workloads
Ranger and Security Services
<ul style="list-style-type: none"> Workload - there is capacity to manage responses if the team performance is improved

[Seasonal Campaigns]	
<i>Output</i>	<i>Issues</i>
Parking	<ul style="list-style-type: none"> Need to consider targeting dangerous parking around schools at the start of the school year/term Regular patrols of timed parking in shopping areas not routinely conducted No paid parking in City of Bayswater
Dog Registration	<ul style="list-style-type: none"> Only approximately 50% of dogs in the City registered

General
<ul style="list-style-type: none"> Too many systems being used



12.3. Appendix 3 - Solutions Identified



Service Name	Compliance
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- ECM - terminology - need to cross reference search - previous system worked better
- ECM - reporting issues, unsure whether to phone or enter - no log in some staff ECM
- Relevant compliance documents on Intranet
- Finding information - consistent training
- Officer accountable for record keeping
 - Investigate a simpler more user-friendly record keeping process
 - Decisions made about where things are stored - on ECM or other systems.
- Training for compliance
 - Sometimes we don't realise that we are not compliant with legislation
 - Need to be accountable
 - Timely training
 - More ownership from management - at team meetings have information trickled down
 - Recognise issues relevant to other departments
 - Induction programs and checklists
- More training for staff in compliance e.g. pool inspections
- Solution training - rate importance of issue
- Working together to tackle compliance issues
 - Sharing policy/legislative change
 - Trends
 - Sharing knowledge
- Getting help to meet compliance obligations
 - Contract out - e.g. RLSS for pool inspections
 - Diversify current positions - looking at current resources, particularly seasonal employees who might tackle compliance tasks in the off season or job share roles.
 - Draw on cross functional knowledge to complete diverse tasks
- Lack of integration - need system integration - Tech One might be able to help
- System improvement - one platform as a business tool
 - Tech One
 - Ensure systems talk to each other - integration
 - Advise staff of integration
 - What is the cost of introducing a single platform?
 - Need a maintenance schedule built in to ensure that it is kept up to date
 - Electronic trigger/built in reminder for inspections etc. so that officers have a date for follow up
- System suggestions
 - Share point - e.g. City of Nedlands
 - Whole of systems approach
- Digital inspection software to enable input from iPad/mobile infringement devices across the organisation
 - Create reports

- Solve in a timely way
 - One step - reduce duplication of effort
- IT - Compliance solutions - modules updated iPad - mobile inspection units i.e. pool - current systems out of date
- IT re complaints or issues/applications tracking number (ref Aus Post)
- Use common templates/cheat sheets
 - DLGC and WALGA
 - Clear guidelines of compliance and why we do it
 - If any Act or policy updates occur, provide updates in bi-monthly newsletter and toolbox meetings for all staff
- Swimming pool inspections
 - Contract out
 - Vehicle to retain staff
 - Compliance business unit (internal compliance audit)
 - More staff required
- Unregistered animals - drones also for pool fence inspections (drone would need to be registered or the service outsourced)
- Enforcement public spaces - more training and better guidelines
- All vehicles should be pooled and available
- Vehicles - all compliance officers in field should have vehicle, impossible to work in around managers usage
- Cars/vans for use over weekend events and functions
- Create a department for compliance
 - Rangers/Health as one team
 - Coordinate responses back to customer
 - Cross functional and easier to deal with multiple issues
 - For example City of Stirling fast track response
- Complete compliance unit for building/development
- External auditor across all branched and/or internal
- High workloads impact ability to do compliance issues - restructure, more staff (building unit A knowledgeable person in each unit/branch on compliance)
- Depot understaffed to do compliance i.e. road side inspections - need more staff
- Restructure based knowledge and experience
- Inconsistencies on compliance- restructure on staff dealing customer service officer - other councils do this
- Compliance built into all staff PD's
- Need defined process re compliance
- Less warnings, more infringements
- Better use of time to start early
- Public announcements - events - increase density builds more people, generally better behaviour
- Policy and legislative changes - create awareness with staff, residents and councillors - requirement necessary and has to be actioned

- Councillors should not interfere with compliance issues
- Complaints in writing - those received via email - these can be sent from a 'dodgy' email address so that the complainant remains anonymous. To alleviate this issue, have a compliance complaint form for completing that incorporates the: who, address, impact, pictures etc. and a statement that the complainant is willing to be a witness in court.
- Customer service - have a central customer service team trained to provide information as a first point of contact.
- Customer service - have a 'bible' / knowledge management system in place so that they:
 - know who does what in the organisation,
 - can provide information and direction to the caller in the first instance,
 - filter calls so that the unnecessary/information gathering phone calls are not placed through to the wrong officer/or officer for that process,
 - reduce phone calls to officers, which in turns improves efficiency
- Look at having a Verge Licence System for new developments (similar to City of Stirling) - inspection fees are charged, street trees attract bonds, and refunds on bonds are dependent on conditions met/not met and ensure consistent treatment of builders/owner builders in relation to being infringed for noncompliance.
- Street Trees - cannot protect reactively (due to evidence), look at protection proactively - introduce a tree protection zone within the Verge Licencing System to protect the tree during development and on final inspection.
- City to review relevant Local Laws and policies for compliance
- Inspections for street lights - any non-working lights to be reported to Western Power. Educate staff and public to approach Western Power in the first instance.
- Change the non-consistent approach to compliance so that all departments act/respond/enforce in the same way to alleviate double handling.