



Consultation Response

FROM THE RSPCA IN WALES

Consultation response: Reforming Local Government - resilient and renewed

April 2017

RSPCA Cymru welcomes the opportunity to respond to this Welsh Government consultation on reforming local government and have answered the questions relevant to our work. For ease these are questions 1, 2, 3, and 12.

Question 1: The Welsh Government believes that it is appropriate to consider “tests” to frame thinking around regional working. Do you think the “tests” set out are helpful in guiding thinking? What other tests or considerations might also be helpful?

RSPCA Cymru supports the idea of having tests to help understand the motivation behind regional working. One of the major services offered by local authorities that is prominent with members of the public, is the provision of stray dog services i.e dog wardens. Research by RSPCA Cymru has found that the majority of local authorities only offer stray dog services Monday to Friday, 9am till 5pm, with little or no out of hours services, unless they are provided by the private boarding kennels that the council uses. Out of the 22 local authorities, only four retain their own kennels - this is shortly due to reduce to three - with the remaining councils outsourcing to private kennels.

Applying stray dog services to the tests for regional working, we believe can help improve the resilience and viability of the service, which has come under constant budgetary pressures over the last few years, with a number of experienced staff being redeployed to other areas or lost due to redundancy. It is also a key service where members of the public expect the same level of provision irrespective of council boundaries.

However, as referred to in the White Paper, by regionalising services such as stray dog provision this must not be an opportunity for local authorities to cut the budgets for these services any further, but to use it as an opportunity to spread best practice, ensure a continuity of service across the country and, most importantly of all, help to reunite dogs with their owners and ensure improvements in animal welfare.

Question 2: In this White Paper the Welsh Government has set out a number of areas which it believes should be required to be delivered on a regional basis. Do you agree that these areas should be delivered regionally? What practical considerations should we consider in taking these proposals forward? What other ‘ancillary’ powers would be required to ensure the effective exercise of the function exercised regionally?

RSPCA Cymru works closely with a number of council departments, most notably Public Protection. Under the White Paper the Government is proposing for public protection functions to be undertaken regionally, naming environmental health, trading standards and licensing as key components.

The inclusion of these departments is welcome as there is an inconsistency within local authorities in the provision of animal welfare services, such as stray dog provision, where services can come under either environmental health or trading standards and different employees having different job titles and activities, as well as levels of service provision depending on the council. This lack of consistency is spread across the different aspects of animal health, such as equine abandonments and fly-grazing, where in South Wales these issues are tackled by a myriad of departments including Trading Standards, Park Services, Highways, Environmental Health and Animal Trespass Teams. By including these services into regional working we would hope that it would remove these inconsistencies, increase effectiveness and knowledge within the departments.

Regionalising these services will bring greater clarity as to which councils are providing the services for each area, for example Torfaen, Blaenau Gwent and Powys share some, but not all, animal health services. However, the early adoption of joint working by councils outside of the proposed regions will potentially lead to similar problems being discussed under question 12, where some services are shared between Bridgend and councils to the west and other services to the east.

RSPCA Cymru is pleased that licensing will also be included in regional working. Currently each local authority is free to adopt different levels of Model Licensing Conditions (MLCs). These conditions are meant to create minimum standards for licensed establishments to meet however, by enabling the adoption of different MLCs at a local level it can create confusion for businesses (e.g. dog breeding) and members of the public. For example, research carried out by RSPCA Cymru has found that half of councils in Wales do not have licensing conditions for people running home boarding establishments.

One of the Welsh Government's test for regional working is whether or not good practice can be expanded on. Since 2008, RSPCA Cymru has run the Community Animal Welfare Footprint (CAWF) awards which recognises good practice by local authorities, housing associations and contingency planners in relation to animal welfare. The awards cover four categories - Stray Dog services, Housing, Contingency Planning and Animal Establishment licensing - rewarding organisations with either a bronze, silver or gold award. A special recognition award - the Welsh Innovator, which is competitive unlike the other categories - is given to organisations that go above and beyond their daily work to improve the lives of animals. In 2016, South Wales Police were highly commended for their work in improving the welfare of dogs in kennels by reducing the time spent in kennels from months to days by fully utilising the options available to them.

Last year 16 awards, from the main categories, were given to 14 organisations with five reaching the minimum standards for the gold award. The criteria for each award and the full list of winners in 2016 can be found at politicalanimal.org.uk/topics/wales/cawfcymru-2/. These are only examples of best practice where organisations have self-nominated themselves and met the requirements under the CAWF scheme. RSPCA Cymru is confident that other examples of best practice do exist across Wales within local authorities.

Question 3: In this White Paper the Welsh Government has set out a number of areas which it believes could also be delivered on a regional basis. Do you think that Local Authorities should also be required to work required regionally to deliver these functions? Are there any other practical considerations we should be aware of?

One aspect that RSPCA Cymru would suggest can be delivered on a regional basis is the education of the public on responsible dog ownership, through widened Public Services Boards (PSBs). The Well-being of Future Generations (Wales) Act 2015 requires the PSBs to improve the social and environmental wellbeing of the area they cover, RSPCA Cymru believes that a failure of residents to be responsible dog owners, can be detrimental to the social and environmental well-being of an area, with responsible dog owners being wrongly demonised for anti-social behaviour, such as dog faeces and uncontrolled barking, with the irresponsible owners guilty of such actions, not being sanctioned. Improving responsible dog ownership PSBs can meet two of the Wellbeing goals; “a healthier Wales” and “a Wales of cohesive communities”, as well as improving the welfare of dogs locally.

Pet ownership improves the mental health of the owner and increases their physical activity and by increasing responsibility, areas can become more attractive with less dog faeces and decreased noise pollution from barking dogs, as well as increasing positive interactions across the community and ending the divide between dog and non-dog owners and potentially reducing dog attacks/bites. The use of Public Space Protection Orders (PSPOs) are being used across Wales however, differing conditions imposed by councils, such as banning dogs from marked sports pitches, can cause confusion amongst members of the public and negatively impact on the relationship between members of the community.

Another issue that can be included into the work of PSBs is the prevention of dog bites through education. The Review of Responsible Dog Ownership in Wales¹, submitted to the Welsh Government in March 2016, by a working group consisting of police, Dogs Trust, Environmental Health Wales and led by RSPCA Cymru, looked into, as part of the review, dog bites in Wales. From January 2013 to January 2014, 6,740 people required hospital treatment due to a dog bite or strike, and the Review has provided some recommendations on how to tackle the situation. By widening the scope and scale of the PSBs, regions will be better placed to improve education on responsible dog ownership, using best practice from other areas to tackle this problem once and for all and improve the safety of local residents.

Question 12: The Welsh Government believes that in order to put in place arrangements which reduce complexity for Authorities and their partners the position for Bridgend needs to be considered. Although Bridgend is fundamentally concerned in this, other partners including other Local Authorities and the Local Health Boards also have valid interests. We are therefore seeking views on how best to address the issues set out here.

As mentioned above the RSPCA’s involvement with local authorities mainly revolves around key services such as stray dog provision and animal related licensing services. Although we are unable to comment on other partnership working in the Bridgend area for health and social care, we feel it appropriate to mention that the Shared Regulatory Services covering Bridgend, Cardiff and Vale of Glamorgan Councils were awarded two RSPCA Cymru Community Animal Welfare Footprint (CAWF) awards in 2016 meeting the minimum requirements for silver in the Stray Dog footprint and bronze in the Animal Establishment Licensing category. The minimum standards can be found at politicalanimal.org.uk/topics/wales/cawfcymru-2/.

¹ <http://politicalanimal.org.uk/wp-content/uploads/2016/03/Responsible-Dog-Ownership-Review-March-2016.pdf>