

Personnel Committee

Date: Thursday, 19 December 2019Time: 10.10 am (or at the rise of the Executive if later)Venue: Council Antechamber, Level 2, Town Hall Extension

Everyone is welcome to attend this committee meeting.

Access to the Council Antechamber

Public access to the Council Antechamber is on Level 2 of the Town Hall Extension, using the lift or stairs in the lobby of the Mount Street entrance to the Extension. That lobby can also be reached from the St. Peter's Square entrance and from Library Walk. There is no public access from the Lloyd Street entrances of the Extension.

Membership of the Personnel Committee

Councillors - Ollerhead (Chair), Akbar, Bridges, Craig, Leech, Leese, N Murphy, S Murphy, Rahman, Richards, Sheikh and Stogia

Agenda

1. Urgent Business

To consider any items which the Chair has agreed to have submitted as urgent.

2. Appeals

To consider any appeals from the public against refusal to allow inspection of background documents and/or the inclusion of items in the confidential part of the agenda.

3. Interests

To allow Members an opportunity to [a] declare any personal, prejudicial or disclosable pecuniary interests they might have in any items which appear on this agenda; and [b] record any items from which they are precluded from voting as a result of Council Tax/Council rent arrears; [c] the existence and nature of party whipping arrangements in respect of any item to be considered at this meeting. Members with a personal interest should declare that at the start of the item under consideration. If Members also have a prejudicial or disclosable pecuniary interest they must withdraw from the meeting during the consideration of the item.

4.	Min	utes

To agree the minutes of the meeting held on 5 December 2019 5 - 6 as a correct record.

5.	Adoption of Greater Manchester Continuous Service	7 - 16
	Protocol	
	The report of the Chief Executive is enclosed.	

6.	Strategic Commissioning - Additional Capacity	17 - 24
	The report of the Chief Executive is enclosed.	

Information about the Committee

The Personnel Committee is made up of the Leader of the Council, the other nine Members of the Executive, the Assistant Executive Member (Finance and Human Resources), and the Leader of the Opposition.

Amongst its responsibilities, the Personnel Committee considers department staffing and organisational reviews; determines collective and corporate terms and conditions of staff and 'market rate' supplements. The Committee also determines the assignment and re-grading of certain posts and policies relating to local government pensions.

The Council is concerned to ensure that its meetings are as open as possible and confidential business is kept to the strict minimum. When confidential items are involved these are considered at the end of the meeting at which point members of the public are asked to leave.

The Council welcomes the filming, recording, public broadcast and use of social media to report on the Committee's meetings by members of the public. Agenda, reports and minutes of all Council Committees can be found on the Council's website www.manchester.gov.uk.

Smoking is not allowed in Council buildings.

Joanne Roney OBE Chief Executive Level 3, Town Hall Extension, Albert Square, Manchester, M60 2LA

Further Information

For help, advice and information about this meeting please contact the Committee Officer:

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Personnel Committee

Minutes of the meeting held on 5 December 2019

Present: Councillor Ollerhead – in the Chair

Councillors: Councillors Akbar, N Murphy, Leech, Rahman, Richards and Stogia

Apologies: Bridges Craig Leese, S Murphy and Sheikh

PE/19/26 Minutes

Decision

To confirm the minutes of the meeting held on 16 October 2019 as a correct record.

PE/19/27 Recruitment arrangements for post of Strategic Director, Growth and Development

The Committee considered a report of the Chief Executive regarding the intended retirement of the Strategic Director of Growth and Development from April 2020.

The Interim Director Human Resources introduced the report and informed the Personnel Committee of the Chief Executive's decision to exercise her delegated authority to commence appointment to the post.

No Trade Union comments had been submitted for the item. The Committee thanked Eddie Smith for his outstanding service to the City of Manchester and in particular, for the huge impact his work had made on the regeneration of East Manchester. The Committee fully supported the proposal that the Chief Executive exercises delegated authority for the appointment to the post and agreed that the relevant Executive portfolio Members be consulted as part of those arrangements:

Decisions

- 1. To note that the Strategic Director of Growth and Development has indicated he will be retiring from April 2020 and to thank Eddie Smith for his work for the Council over many years.
- 2. To note that the Chief Executive proposes to commence recruitment to the post immediately and has decided to exercise her delegated authority to commence appointment to the post in consultation with the Leader of the Council, Councillor Carl Ollerhead, Councillor Suzanne Richards, Councillor Angeliki Stogia, and Councillor Luthfur Rahman and Councillor Nigel Murphy.
- 3. To note the proposal to recruit to this Non-Statutory Chief Officer role on a like for like basis; title, role and grade remaining unchanged.

4. To note that a further report will be submitted to the Personnel Committee early in 2020 following a review of the wider directorate management team capacity.

PE/19/28 Realign Senior Leadership Capacity in City Solicitor's

The Committee considered a report of the Chief Executive which put forward a proposal to realign senior leadership capacity with the City Solicitor's portfolio in the context of the departure of the Director of Strategic Communications and the need to realign and develop wider leadership and management capacity.

The proposed changes will lead to a budget saving of £18k and are designed to invest in delivery capacity in support of the Council's strategic objectives.

No Trade Union comments were submitted for consideration of the item.

The Committee thanked Jennifer Green for her contribution to the City of Manchester and agreed the proposals.

Decisions

- 1. To note the resignation of the Director of Strategic Communications with effect from 3 January 2020 and to thank Jen Green for her commitment and dedication to organisation for the past 20 years.
- To agree the disestablishment of the Director of Strategic Communications SS3 (£78,715 - £87,217) and the re-establishment of a Head of Strategic Communications role SS2 (£68,526 - £74,175).
- 3. To note the retirement of the Head of the Executive Office with effect from 31 January 2020 and to thank Helen France

Manchester City Council Report for Resolution

Report to:	Personnel Committee – 19 December 2019
Subject:	Adoption of Greater Manchester Continuous Service Protocol
Report of:	The Chief Executive

Summary

To review Manchester City Council's position relating to the adoption of the Greater Manchester Continuity of Service Protocol in support of the continuing further integration of health and social care working, and the attraction of quality candidates to roles within the city.

Recommendations

The Personnel Committee is asked to:

- 1. Approve the full adoption of the Greater Manchester Continuity of Service Protocol for relevant new starters with effect from 1st January 2020.
- 2. Note that the below affected policies will be updated to reflect the agreed position.
 - Annual Leave Policy
 - Recruitment & Selection Policy
 - Contractual sick pay
 - Pay policy statement
 - Voluntary severance.
 - Maternity Policy
 - Paternity Policy
 - Maternity Support Policy
 - Shared Parental Leave Policy

Wards Affected: All

Financial implications for the revenue and / or capital budget

If an individual whose service MCC has recognised as part of the GM protocol were to be made redundant, then there would be increased costs on the revenue budget associated with the recognised service. Risks in this regard are deemed to be currently low.

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Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers overleaf.

Personnel Committee 30 May 2018 - Greater Manchester Continuity of Service Protocol

1.0 Background

- 1.1 The GM Continuity of Service Protocol (the Protocol) was developed by the Greater Manchester Workforce Engagement Board (GM WEB) during 2017 and was subsequently endorsed by the Greater Manchester Combined Authority (GMCA) and Greater Manchester Health and Social Care Partnership (GMHSCP). The purpose of the commitment was to provide a collective commitment to, and common framework for, recognition of continuity of service for the purposes of access to contractual benefits. Its principal aim is to support and encourage recruitment and retention of staff within the GM Health and Social Care system, thereby helping to minimise gaps in workforce and avoid delays and costs of recruitment into core services.
- 1.2 The Personnel Committee considered a report relating to the potential adoption of the Protocol at its meeting of 30th May 2018. The Protocol is attached for reference at Appendix 1.
- 1.3 At that meeting it was agreed that the Council would adopt the Protocol on a discretionary basis to allow continuity of service (across in scope organisations) for individuals in respect of service-based workforce terms, conditions and policies to support flexibility of movement and/or recruitment to difficult to fill posts.
- 1.4 In this regard the Committee also granted delegated authority to apply the Protocol on a discretionary basis to the Director of HROD in conjunction with the relevant Strategic Director. Delegated authority was also granted to the City Treasurer in consultation with the Executive Member for Finance and Human Resources to determine discretionary payments for redundancy in appropriate cases.

2.0 Scope of Continuity of Service Protocol

- 2.1 Statutory continuity of service, used for the purposes of determining access to statutory entitlements (including statutory redundancy pay), is clearly outside the scope of the Protocol as are pension arrangements. However, contractual continuity of service which determines access to a number of contractual benefits (including contractual redundancy pay, annual leave and occupational sick pay entitlement) is within scope. Recognition of contractual continuity of service is generally already accepted by employers on a sector-specific basis, and already applies in the cases of voluntary moves between local authority organisations and voluntary moves between NHS organisations.
- 2.2 It is also important to note that continuity of services is protected by law in the case of compulsory moves between organisations under the terms of TUPE legislation.

3.0 Current Implementation Position across GM and in the Manchester Locality

- 3.1 In line with the MCC decision, the Protocol was also not immediately adopted by public sector health and social care employers in the rest of the Manchester Locality (primarily Manchester Foundation Trust and Manchester Clinical Commissioning Group). This was mainly due to uncertainty and concerns about the transfer of financial risks, particularly those associated with accrued service costs in the event of redundancy. It was also noted at that time that the Protocol was not being uniformly applied across all local authority and NHS employers within GM, with a minority of employers choosing to exclude contractual redundancy rights from the scope of their locally agreed implementation protocols.
- 3.2 Whilst the Protocol was not immediately adopted, Manchester Locality employers have continued to accept the principle of voluntary recognition of previous services on a case by case basis.
- 3.3 The absence of agreement to the Protocol in Manchester has been subject to a number of discussions within the Manchester Locality Workforce Transformation Group (LWTG) and Manchester Workforce Engagement Forum (WEF), and also through other informal meetings.
- 3.4 Increasing concerns have been voiced by trade union representatives at the Manchester WEF about the lack of a consistent position across Manchester and the failure to 'sign-up' fully to the Protocol by major employers. In response to these concerns, the Chair of the Manchester Workforce Engagement Forum met with employer and trade union representatives of the GM WEB in February 2019 and agreed the following steps.
 - GMHSCP would undertake an impact assessment of the Protocol as adopted by local authority and NHS employers across GM and report back to Manchester LWTG.
 - Manchester LWTG would complete a risk assessment based analysis of actual redundancies over preceding 12 months or potential future redundancies.
 - Manchester LWTG to agree a recommendation to be made to individual employing organisations in the Manchester Locality to adopt a collective position on the full adoption of the Protocol (subject to the outcomes of the above analysis).
- 3.5 This analysis has now been completed and whilst it remains the case that some variation still exists in how the Protocol has been adopted in different localities across GM, it is clear that (outside the Manchester locality) the Commitment has been fully adopted by both local authority and NHS employers in the majority of localities and partially adopted in the remaining minority of other localities. Furthermore, no information has been provided by local authority or NHS employers to indicate any recent or potential future

redundancies in the Manchester locality. Therefore, the risks associated with transferring redundancy cost liabilities between organisations are considered to be very low, particularly when viewed alongside the increased opportunities that the Protocol offers to employers in identifying suitable employment across organisational boundaries should redundancy situations materialise in future.

Clearly this risk would increase if MCC needed to introduce a voluntary severance or retirement scheme at any point in the future - and if there were to be a significant rise in those moving between sectors.

3.6 It is important to note that the Continuity of Service Protocol has also now been incorporated as a key pillar of the new Greater Manchester Employment Charter, which has recently been developed by the GM Mayor's Office, and is currently being considered for adoption by local authority and NHS employers across GM.

4.0 Current view of the Locality Workforce Transformation Group

- 4.1 At their meeting on 30th August 2019 the Manchester LWTG reviewed the above position and agreed that the timing was now appropriate to recommend full adoption of the GM Continuity of Service Protocol to their respective organisations not only because the risks appear minimal but because this is the right thing to do in support of the further integration of health and social care working. It will also be the increasing expectation of candidates that this is the case, and we need to be in a position to attract the best from the market.
- 4.2 MFT and Manchester CCG are now moving the proposed adoption through their respective governance processes with the aim to have an aligned effective date of 1st January 2020. The adoption of the protocol by MCC is not proposed to be dependent on approval within partner organisations as it is the right thing for MCC to do at this time and this will mean that all local authorities with GM are signed up and will not place us at a disadvantage as an employer of choice.

5.0 Recommendations

- 5.1 The Personnel Committee is asked to:
 - Approve the full adoption of the Greater Manchester Continuity of Service Protocol within Manchester City Council for relevant new starters with effect from 1st January 2020
 - Note that the following affected policies will be updated to reflect the agreed position:
 - Annual Leave Policy
 - Recruitment & Selection Policy
 - Contractual sick pay
 - Pay policy statement
 - Voluntary severance.

- Maternity Policy
- Paternity Policy
- Maternity Support Policy
- Shared Parental Leave Policy

6.0 Comments of the Interim Director of HROD

I fully support the adoption of the GM Coninuous Service protocol to ensure Manchester City Council can attract the best market candidates, and to directly contribute to the further transformation and integration of health and social care within the locality.

7.0 Comments of the Trade Unions

To follow.

GREATER MANCHESTER CONTINUITY OF SERVICE COMMITMENT

INTRODUCTION

The Greater Manchester Combined Authority and Health and Social Care Partnership Board agreed a GM commitment for Joint Working on Workforce Matters in December 2015.

This commitment recognises that staff play a vital role in the delivery of high quality public services and that high quality employment in public services plays a vital role in the functioning of the Greater Manchester economy and society.

Flexibility of employment across public services is an ambition shared by the organisations and recognised trade unions. Portability of accrued service is a key consideration for employees which must be addressed to secure such flexibility.

There is no reason in law why an employer cannot introduce express terms into its contracts of employment, or do so by means of a change of policy, which are more advantageous than the statutory rights already afforded to its employees, provided it ensures those terms are applied fairly and in accordance with its equalities duty. What it cannot do is seek to limit or take away those rights except in the most exceptional of justified circumstances or where permitted by law.

A public body must also ensure its rationale for such action makes economic, social and environmental sense for them and their communities, and is of benefit to the public purse.

Any change in terms and conditions of employment to employees of a public body would be subject to consultation.

PURPOSE

As a first step this commitment provides a mechanism for recognition of service where an individual employed within local government or the NHS in GM moves employment between those sectors on a voluntary basis.

Adoption of the commitment by the GM local authorities, GMCA and NHS organisations would be voluntary and would be a decision for each individual organisation within their respective governance arrangements.

This commitment applies to the employers listed below and does not seek to extend such an agreement to the wider employer group comprising commissioned providers e.g. third sector parties, at this point in time.

Supporting organisations

Sector	Full adoption	Partial adoption
GM Local	Bolton	Manchester
Authorities	Bury	
	Oldham	
	Rochdale	
	Salford	
	Stockport	
	Tameside	
	Trafford	
	Wigan	
Association of	NHS Bolton CCG	NHS
GM CCGs	NHS Bury CCG	Manchester
	NHS Heywood, Middleton and Rochdale CCG	CCG
	NHS Oldham CCG	
	NHS Salford CCG	
	NHS Stockport CCG	
	NHS Tameside and Glossop CCG	
	NHS Trafford CCG	
	NHS Wigan Borough CCG	
GM NHS	Bolton NHS FT	Manchester
Provider	Greater Manchester Mental Health NHS FT	University NHS
Trusts	Pennine Acute Hospitals NHS Trust	FT
	Pennine Care NHS FT	
	Salford Royal NHS FT	
	Stockport NHS FT	
	Tameside and Glossop Integrated Care NHS FT	
	The Christie NHS FT	
	Wrightington, Wigan and Leigh NHS FT	
Additional	GM Health & Social Care Partnership	
Public Service	Transport for Greater Manchester	
Organisations	Greater Manchester Combined Authority	
	(including GMFRS and GM Waste)	

The accrued service will be used for the calculation of contractual entitlements in accordance with the policies and terms and conditions of the relevant participating employer, except where statute does not permit.

This commitment does not apply to pension arrangements.

DEFINING CONTINUITY OF SERVICE

The calculation of an employee's "continuous service" and/or "reckonable service" is extremely important in determining the qualification for and value of 'time served' entitlements.

It determines access to statutory entitlements such as making a claim for unfair

dismissal at an Employment Tribunal and the application of the statutory redundancy scheme. However, continuous service recognised through this commitment will not be taken into account when determining service for unfair dismissal or statutory redundancy. The recognition of continuous service within this commitment will determine access and value of contractual entitlements such as annual leave, occupational sick pay, occupational maternity pay and contractual severance schemes. Individual employers can decide how their contractual entitlements will be applied.

BENEFITS OF RECOGNISING CONTINUITY OF SERVICE

The benefits of a flexible workforce, facilitated by the adoption of this commitment, are summarised below: -

- Having a geographically and organisationally mobile workforce at a GM level will benefit both organisations and individuals. Employee movement within and between these organisations flexibly can help movement of staff into priority areas ensuring delivery at local level.
- A flexible GM workforce will strengthen cross organisational cultural understanding, enhance professional links and increase partnership working. Learning best practice from each other can only improve the totality of approaches adopted individually by each organisation.
- Employees, in turn, gain opportunities for personal and professional growth which can enhance their career opportunities. This increases staff morale and a motivated workforce, within a potentially shrinking public services sector, which is critical in delivering the challenges of devolution.
- A flexible workforce could support the deployment of staff across sectors during periods of organisational downsizing and service redesigns, increase GM ability to attract and retain staff with specialist skills and improve workforce and succession planning on a wider scale.
- Organisations can cut staff turnover costs and fill specialist roles more easily e.g. social workers moving from local authorities into local integrated care organisations under the NHS.
- Organisations can save on redundancy costs as there would be a wider pool of reasonable, suitable redeployment opportunities.
- Staff with cross-sectoral experience and understanding are essential for delivering new transformed services and redesigned roles in integrated services. The easy movement of staff between the NHS and local authorities will increasingly be needed going forward. A flexible workforce will aid the development of a shared language to describe capabilities required in all roles, with accompanying tools and resources.

CHANGES TO EMPLOYER POLICIES

Organisations who are party to this commitment may need to make amendments to their local employment policies and procedures in respect of entitlement for contractual purposes.

Local Authorities will need to amend their policies in respect of application of the 2006 Discretionary Compensation Regulations to incorporate recognition of

continuous service with NHS bodies and others party to this commitment. Reference may also be included in the annual Pay Policy Statement.

NHS organisations party to this commitment have some flexibilities in national agreements and to act outside the national agreements if they opt to do so. The test must always be one of 'acting reasonably' in relation to resources/ and the use of public money.

CONCLUSION

This commitment marks a significant step for Greater Manchester in achieving reform of public services. A competent, engaged workforce is a key enabler to successful reform and it is important to facilitate not only retention of skills and knowledge but to ensure that the sector is seen as attractive and rewarding to future generations.

The commitment applies in the first instance to the voluntary movement of employees between local government/identified public sector bodies and NHS employers as a proof of concept. The Greater Manchester Workforce Engagement Board will monitor the application and success of this commitment and will make recommendations for any further revisions as appropriate.

Manchester City Council Report for Resolution

Report to:	Personnel Committee – 19 December 2019
Subject:	Strategic Commissioning - Children and Education Services
Report of:	The Chief Executive

Summary

To seek approval for the establishment of a post of Strategic Lead for Commissioning Children and Education Services to take responsibility to lead the development, transformation and delivery of Children's Services commissioning strategy and associated priorities.

This role will be part of the leadership team within Children's and Education Services and work in close partnership with Manchester Health and Care Commission and regional and other commissioners in Greater Manchester. The primary aim of the post holder will be to nurture effective relationships in provider market, develop effective commissions that deliver tangible outcomes for children that are value for money; a key element of the Directorate's budget strategy.

Recommendation

The Committee is requested to approve the creation of a new role of Strategic Lead for Commissioning Grade SS1 (£60,857 - £65,865).

Wards affected: All

Financial implications for the revenue and capital budgets:

The financial implications of the proposals in this report are estimated to be £85k which are included in the 2020/21 budget proposals for the directorate's commissioning strategy.

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Background documents (available for public inspection): None

1.0 Background

- 1.1 Manchester is a large, diverse and complex local authority region with high demand on social care services and in addition a growing school age population, increased needs and a complex education system/family of schools. Since 2014, significant progress has been made within Children and Education Services in improving the services Manchester's children and young people receive. This has seen Ofsted judge Children's Service no longer to be 'inadequate', school attendance across the school system better than national averages and the percentage of primary schools judged to be good or better increased.
- 1.2 Despite the significant progress, Manchester City Council has over 1,300 children and young people that are 'looked after' and the cost for their care is rising. Ensuring there is sufficient and appropriate placements that offer value for money and meet the needs of our children and young people is critical to their future development and wellbeing.
- 1.3 An independent review into the Children's Services looked after sufficiency arrangements concluded that there is insufficient strategic commissioning capacity to develop and deliver a set of commissioning priorities designed to ensure the needs of 'our' children and young people are met and the Directorate is better enabled to successfully deliver its budget strategy.

2.0 Children's Commissioning

- 2.1 Children's Services commissioning expenditure accounts for £50m of the Council's revenue through the commissioning of a broad range of services which contribute to and meet the needs of our children and young people; including those who are 'looked after' by Manchester City Council. However, the increase in demand, cost of care and lack of suitable care placements within the market has seen costs increase by 60% in the last 2 years. This is placing significant pressure on the Children's Services budget. Subsequently an analysis and review has been undertaken to consider our commissioning and procurement arrangements, which identified there is insufficient commissioning capacity to build effective relationships/partnerships within the provider market, work in partnership with other commissioners to develop purchasing frameworks/contracts and restricts the ability of the service to maximise its position in the children's care market; thus reduce placement costs.
- 2.2 Children's and Education Services has a commissioning, contracts and placements function which provides operational support to the Directorate with commissioning arrangements, contract management and assurance and placement finding. The function is comprised of commissioners and contract managers with the primary focus of providing operational expertise to the directorate which ensures services are commissioned in accordance with the commissioning framework, ensures value for money and contracts are managed effectively. The service is managed by a Commissioning Manager (Grade 12) who reports directly to the Strategic Director of Childrens and

Education Services and has overall responsibility for this service area including the management, governance, effectiveness and outcomes.

2.3 For the past two years the Directorate has focused on building a safe, effective and efficient commissioning function that is able to support and respond to the needs of our children and young people by offering sufficient range of placements and securing value for money, where appropriate. A review into the effectiveness of the Directorate's commissioning arrangements and capacity has concluded that whilst there has been success in building sufficient operational capacity to manage commissioning arrangements and contracts effectively, there is a gap in strategic capacity which is required for the service to become a more strategic and influential commissioner across Greater Manchester that is able to secure the best possible improvements and outcomes for our children and young people.

3.0 Strategic Commissioning

- 3.1 Following an internal review of the commissioning/contract arrangements and the findings from the independent review which were carried out to ensure that there are sustainable arrangements for the future which enable the service to deliver a specific commissioning priorities, and secure improved outcomes for our children and young people, it is recommended that a Strategic Lead for Commissioning is established to provide strategic capacity and commissioning leadership/direction to the Children's Leadership Team. The main focus of the role will be to:
 - Set strategic commissioning and contract management priorities for the Directorate;
 - Improvement market management and relations;
 - Develop a Children and Education Services commissioning strategy;
 - Define/develop a recruitment and retention strategy for internal foster carers;
 - Ensure services are strategically relevant, aligned and integrated with a broader range of public sector partners;
 - Provide sufficiency and stability within the market place and support personal choice;
 - Improve the quality of life and health outcomes for Manchester Residents;
 - Improve health inequality;
 - Increase employment outcomes for Manchester Residents; and
 - Achieve and increase value for money for the public purse.
- 3.2 The delivery of these priorities and outcomes will contribute to the Council's Corporate Plan, Children and Young People Plan and Budget Strategy.
- 3.3 The Strategic Lead for Commissioning will work in partnership with MHCC to build effective and sustainable commissioning arrangements, lead system wide commissioning and deliver integrated health and social care services to secure improved outcomes for children and young people within Manchester.

4.0 Conclusion

4.1 The proposal outlined within this report is designed to ensure that there is sufficient strategic commissioning capacity in place to support the Directorate of Children's and Education Service to effectively delivery its priorities, to meet the needs of the increasing number of looked after children, and secure value for money for the public purse.

5.0 Comments from Trade Unions

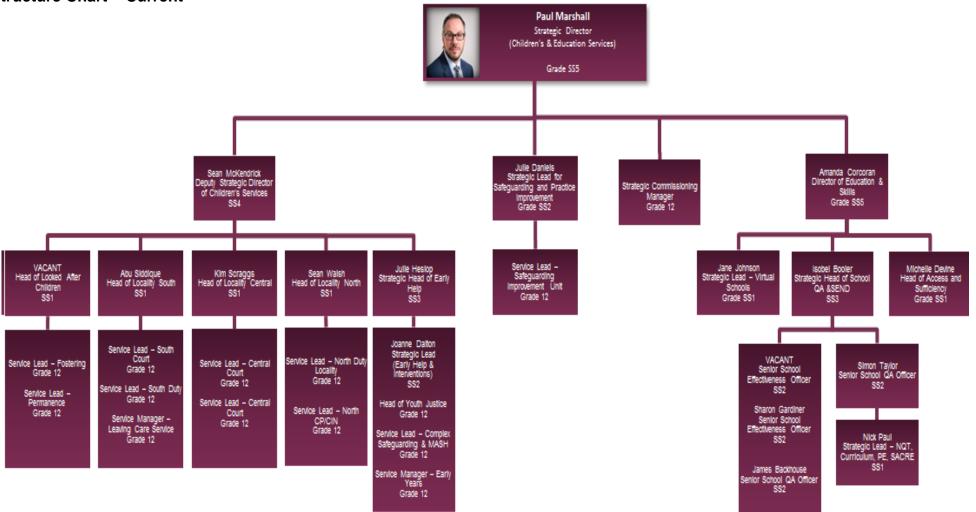
5.1 To follow.

6.0 Comments from the Director of HROD

In establishing the grade and salary for the role the Council's Job Evaluation Process has been applied.

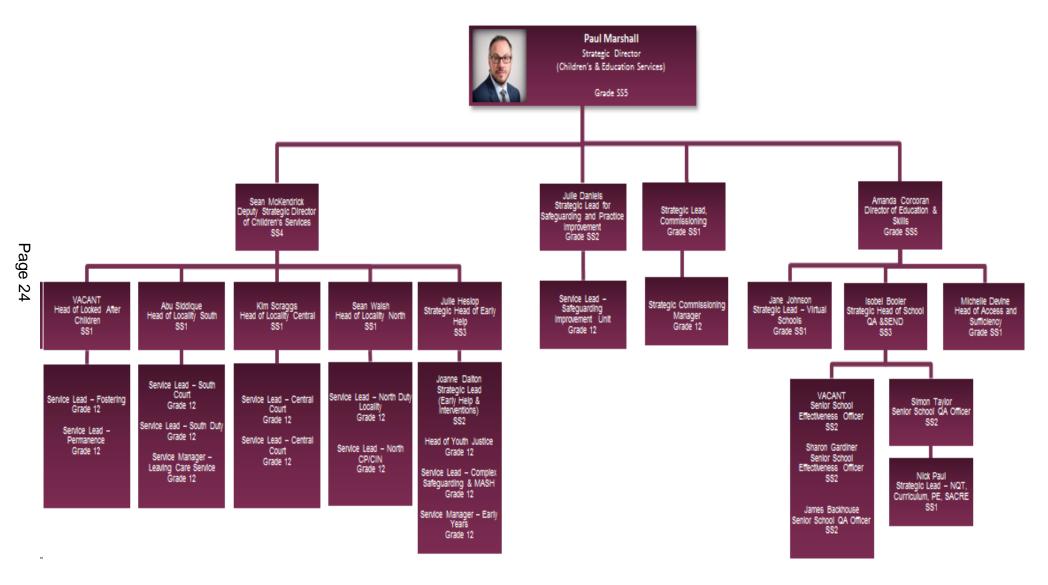
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Structure Chart – Current



Appendix 1, Item 6

Structure Chart - To Be



Appendix 1, Item 6