

Remodelling public protection

The future of councils'
public protection services

Introduction

The fundamental purpose of public protection services (here defined as trading standards, environmental health and licensing) is just that – to protect residents, consumers, businesses and communities. They provide public protection in relation to a range of environmental and health issues – such as air quality, noise, the food chain, and alcohol – and from businesses and rogue traders who unwittingly or deliberately breach acceptable standards set down in legislation. Public protection services have a long established role within the functions of local government.

More recently, there has been increasing recognition that for business-facing public protection services, an important role is to support local businesses and boost local economic growth. Public protection services support businesses by helping them to understand and comply with controls, and also by tackling rogue businesses that undermine reputable businesses and consumer confidence. They also have a role in directing local businesses to other support that councils can provide. Alongside the de- and better regulation agenda, this has been an important driver of public protection services in recent years.

But public protection services are facing significant challenges. They are small services in comparison to other council functions and (with the exception of licensing) are largely reliant on general council funding, that is, council tax and government funding, which has been cut by central government by 40 per cent over the lifetime of the current Parliament. The resulting cuts to public protection budgets have led to a notable reduction in staff numbers, and a significant loss of expertise. Concerns have been raised

about our national resilience in the event of a major public protection incident – for example, a foot and mouth outbreak of the scale of 2001 – and about the long term sustainability of these services with further cuts to local government funding still to come.

It is understandable that the risk to public protection services arising from local government cuts has not received the same level of attention as cuts to other services both small (eg, libraries) and large (eg, social care): these are higher profile services with a more obvious impact on peoples' lives. However there is an equally pressing need for serious thinking, both locally and nationally, about how we can ensure a sustainable future for public protection services over the next decade. This discussion document sets out some of the key issues, challenges and possible solutions: we invite all those with an interest in these services – from councils, businesses, local communities and the professions themselves – to share their views.

Public protection services in 2015

A broad range of responsibilities – and reduced funding

Public protection services encompass a wide and diverse range of activities. Environmental health and trading standards in particular cover a huge array of different responsibilities, some of which have limited relevance to each other beyond the core connecting theme of public protection. Licensing is a more contained service – effectively a particular approach to public protection – but again covers a diverse set of activities. This breadth of activity across public protection could be said to contrast to the functions of, for example, a children's services directorate, which are more obviously linked together and centred on a specific section of the population.

This broad range of responsibilities can make it harder to explain all that these services do. Equally, the fact that for the most part these services are successful when something doesn't happen – because relevant requirements and controls are complied with – means they may only really be visible when things go wrong. This makes it difficult to demonstrate their impact and value.

Examples of public protection activities		
Environmental health	Trading Standards	Licensing
<ul style="list-style-type: none">• housing• food safety• health and safety• pollution – air / noise• animal welfare (dogs, animal licensing controls)• pest control• cooling towers	<ul style="list-style-type: none">• product safety• consumer protection – e-crime, doorstep crime• food standards• animal health and welfare (infectious animal diseases, food chain animal issues)• weights and measures• age-restricted sales (tobacco, alcohol, knives, fireworks etc.)	<ul style="list-style-type: none">• alcohol• taxis• gambling• other (special treatments, street trading etc.)

Trading standards' expanding set of responsibilities

In 2014, the Trading Standards Institute (TSI) commissioned detailed research on the number of statutory functions enforced by trading standards.¹ This highlighted **an overall total of 263 functions**, over 200 of which have been created since 1990. The diversity of the list is as noteworthy as the total number, ranging from regulations governing consumer credit, estate agents, and a variety of infectious diseases linked to animals (anthrax, avian flu) to age restricted sales and various food labelling requirements. The range of responsibilities undertaken by council environmental health officers is equally extensive and diverse.

In recent years, the trend in business-facing elements of public protection services has been towards a more business friendly approach. More broadly, public protection services have also sought to take a more proactive approach to supporting strategic objectives such as public health and economic growth - for example, through the creation of healthy eating, or business accreditation schemes. This contrasts to a narrower regulatory focus on overseeing and enforcing specific legislation and related controls.

However, cuts to local government funding have had a significant impact on these services' capacity both to support the full breadth of their responsibilities and to take a more proactive approach to them.

There has been much less consideration of the impact of local government cuts on

smaller services such as this, despite the fact that they have been afforded less protection than other services that have been prioritised through smaller budget cuts. Research² for the Local Government Association (LGA) has indicated a number of effects:

- Staff resources – the major component of public protection budgets – have fallen significantly in environmental health and trading standards³, on average by around a third.
- There has also been a significant loss of skills and expertise, with early retirement and voluntary redundancy schemes often leading to the departure of more experienced officers.
- Organisationally, overall numbers of directorates and / or management tiers have reduced, leading to public protection services being joined in larger directorates with groupings of other services, and heads of services typically being at a lower management tier than previously. This removes them further from strategic decision making by chief officers and councillors and compounds the challenge of providing a coherent narrative of their diverse responsibilities.
- Anecdotal evidence suggests that there has been a shift away from proactive to reactive work that extends far beyond a risk based approach. Many experienced professionals have expressed concern that as interventions are targeted solely at high risk or non-compliant businesses, overall levels of compliance with important regulations will start to reduce even among responsible businesses.

1 The list identified statutory duties (where there is a mandatory power to enforce) and powers (where there is a power to impose but no mandatory duty) imposed on: weights and measures authorities (ie trading standards functions); local authorities; food authorities and feed authorities (ie local authorities and typically trading standards functions); or otherwise likely to be enforced by trading standards teams. See: <http://www.tradingstandards.gov.uk/jobs/statutorypowers.cfm>

2 http://www.local.gov.uk/web/guest/regulatory-services-and-licensing/-/journal_content/56/10180/6840465/ARTICLE

3 Licensing is largely funded by income from licensing fees, so appears not to have experienced the same level of impact.

Public protection services have always had to prioritise workloads; for example, even before recent cuts to local government funding, it would not have been possible – or necessary, or desirable – to actively support all of the trading standards functions outlined above at any one point in time. But the onset of public sector ‘austerity’ brings into sharp focus the question of how wide and diverse small services can really be, and what core public protection priorities should be given the funding available.

The local / national dimension

Historically, public protection services have been very localised, dealing primarily with local businesses/premises and localised issues such as housing or pollution. In many respects, this remains the case: licensing officers continue to work with local licensed premises; environmental health teams support local food businesses; and trading standards teams tackle doorstep crime and confiscate unsafe products from local shops and markets.

But with food and other product supply chains increasingly globalised, some of the challenges for public protection services are now significantly less local than they once were. The 2013 horsemeat scandal demonstrated that local consumers and businesses are impacted by the activity of businesses from across the whole of the continent. Similarly, the perpetrators of the internet and other e-crime that trading standards teams now routinely tackle may be

located anywhere in the world. Even among responsible and locally based businesses, a larger number than would once have been the case may now be part of national chains, thus bringing them into contact with multiple different council public protection teams.

Public protection services have begun to respond to these challenges. The home and primary authority schemes were set up to create lead authorities for national business chains, with the intention of embedding a consistent public protection approach across the multiple council areas in which a business might operate. More recently, National Trading Standards (NTS) was established in 2012 and is responsible for leading regional and national trading standards work on issues such as illegal money lending, scams, e-crime and safety at ports. The NTS model reflects the fact that it is unrealistic for all councils to develop and retain specialist expertise to deal with the serious criminality and other significant issues that cross boundaries.

A further local / national dimension to public protection services is the existence of a number of national regulators that rely on councils as the local delivery agents for some of their functions, notably the Food Standards Agency, Health and Safety Executive, Environment Agency and Animal Health and Plant Agency. These agencies, rightly, have very limited powers of direction in relation to council activities, which are determined by locally elected politicians.

So far, there appears to have been a pragmatic recognition among these regulators of the difficult decisions facing councils and why public protection services are being cutback. But that notwithstanding, there is undoubtedly concern about the extent to which some of these services have been reduced, and the national regulators will certainly have a view about the impact

of further council cuts and decisions to pare back public protection still further.

Finally, it needs to be recognised that there are inevitably some tensions between local decision making and national resilience in these services, arising again from the fact that these are small services with a diverse range of specialisms.

Councils are rightly making individual decisions to prioritise different elements of these services based on local circumstances and need. Officers increasingly cover a broad range of work within their particular profession, and sometimes at the margin of others.

Yet while such decisions make sense locally, there is a risk that our overall national capacity and resilience in some specialisms is being reduced as officers lose experience of working in certain areas. And there are real challenges for the bodies that educate and train the public protection workforce⁴ when there are question marks over the future of these services and a significantly reduced pipeline of officers entering the workforce. The research undertaken for the LGA included a number of suggestions about the need for flexible training and qualification approaches at both technician and officer level – something that applies across the whole of local government as the overall workforce reduces - but it may be difficult to introduce this without more certainty about the future direction of these services.

In the context of substantial funding cuts, all local government services are under pressure. However, there are additional challenges specific to public protection services, which have a huge range of statutory responsibilities, a relatively low profile, and have not been prioritised or protected.

There is an increasingly urgent need for councils to think seriously about the key priorities for these services, and the most effective ways of delivering them in the future, given the likelihood of further budget reductions in future.

⁴ Chartered Institute of Environmental Health; Trading Standards Institute; National Association of Licensing and Enforcement Officers; Institute of Licensing

Moving forward: the future of public protection services

This section of the report outlines some of the key issues that need to be considered in developing sustainable public protection services. These can be grouped into four key themes:

1. Clarity of purpose and strategic prioritisation
2. Joined up / streamlined local delivery
3. Alternative management models
4. A new balance of responsibility

1. Clarity of purpose and strategic prioritisation

At local level...

There is a need for greater understanding of the core purpose and key priorities within public protection services, and how they fit with broader council objectives such as public health and economic growth. This will not remove the need for some difficult decisions about how to prioritise these services, and which elements councils can no longer afford to undertake. But it will help ensure future national resilience in important areas.

There will inevitably be some local variation between councils as regards the most important specialisms within these services, reflecting local circumstances; a rural county, for example, is likely to have a much greater need for expertise in animal health and feed issues than a London borough. It is for this reason that the LGA believes that regulation should be rooted firmly in local circumstances.

However, there is scope for sector-wide consideration about the core elements of public protection services and how this translates to council service provision, before local circumstances are factored in.

...and centrally

There are also implications beyond the sector, in particular for the Whitehall departments churning out national and European regulations that small local enforcement teams cannot feasibly expect to oversee.

Alongside greater local understanding and clarity about public protection services, there is an equal need for a more realistic approach nationally about the extent to which new responsibilities can be placed upon already stretched local services. The TSI work highlighted the extent to which new statutory duties and powers have been created in recent decades, but the trend is simply not sustainable.

Departments may intend for these newer responsibilities to be implemented on a light touch basis (as with the new plastic bag charge enforcement responsibility); or argue that they are not having an impact because they are not being actively enforced (as with the requirement for trading standards to enforce the display of energy performance certificates in public buildings). However, collectively, these responsibilities add up, and they detract from the core purpose of public protection.

This is not an issue unique to public protection services. There is a fundamental issue to be addressed when civil servants focused on a single issue generate work for councils with little concept of the capacity available to actually deliver it. In the context

of significantly reduced funding and future devolution, we need a much more open debate about whether we have the right balance between the funding / resources at central government level and the funding / resources available locally.

Actions

Councils / LGA / professional bodies

- Support greater understanding and strategic prioritisation of services through the development of a core narrative / core elements approach for public protection services.

Government

- Review and streamline statutory duties and powers in public protection services, including considering a '1 in, 1 out' approach to local enforcement responsibilities.

2. Joined up, streamlined local delivery

Local government has long been recognised as the most efficient part of the public sector, and has worked extremely hard to contain the impact of substantial cuts through innovation, greater efficiency and new ways of working. However further budget cuts in the next Parliament dictate that more still needs to be done, and public protection services will need to explore the extent to which different ways of working can stave off service reductions.

Joining up public protection services and roles

Research for the LGA in 2014 considered the issue of whether in future there may be single 'public protection officers' undertaking a broad range of services cutting across environmental health, trading standards and licensing and other elements of public protection, such as fire prevention. The majority (although not unanimous) view among those who participated in the research was that this was unlikely. The common view

was that while there are core skills across public protection services⁵ and common agendas, some elements of the different professions – for example an in-depth trading standards investigation into e-crime, or a very technical environmental health assessment linked to fracking – are and will remain too diverse for a single role.

This may be the case, but there is much more that can be done to join up related aspects of public protection services and the roles of those working within them. This is particularly the case in relation to businesses or local premises. When visiting or advising these businesses, officers who are competent in one aspect of public protection should be in a position to identify issues in or provide basic advice on other public protection issues straddling licensing, environmental health, trading standards and fire prevention. This joined up approach would be of more use to businesses, as well as maximising the use of resources.

There is evidence of this already happening and some good examples of joining up working; but there is certainly room for this to become more systematic. Professional distinctions are likely to remain – but this should not prevent greater fluidity where this is beneficial and achievable. There may be scope for a combined discipline, or even qualification, in public protection / public protection enforcement, as services and roles change. In the meantime, as resources contract and officers are required to multi-task in different areas, officers and professional bodies should consider what more can be done at council level, and in terms of training, to enable them to proactively address a wider range of public protection issues.

Lead authority models

With further budget cuts, it is unrealistic to expect all councils to continue to offer the range of public protection services and specialisms they once did. Lead authority

⁵ Highlighted in the Better Regulation Delivery Office's Regulator's Development Needs Analysis tool: <http://rdna-tool.bis.gov.uk/>

models may offer a route to ensuring councils can continue to access expertise across a range of different areas despite reduced resources.

Research for the LGA in 2014 found that there is already widespread use of informal sharing of staff with particular areas of expertise, particularly in environmental health (where the number of possible specialisms is much wider than a single authority can carry). The National Trading Standards Board has led to the creation of lead authorities for particular areas of trading standards work (such as Birmingham on illegal money lending, or the Yorkshire and Humberside trading standards group's e-crime unit) and as referenced above, the primary authority model is an established and funded route that designates lead authorities for national businesses with sites in different areas.

National Anti-Fraud Network (NAFN)

NAFN is a shared service hosted by Tameside and Brighton councils that provides data, intelligence and best practice support for councils and other public sector organisations / linked outsourced providers. Currently almost 90 per cent of councils are members and this figure is likely to increase following a government decision in 2014 to mandate all councils wishing to access communications data to do so via NAFN.

Established in 1997, NAFN's track record of innovation and success demonstrates that the lead authority model can be effective in providing specialist services across the whole of local government. This can remove the need for all councils to maintain specific types of expertise; in this case, their own intelligence and support structures.

There may be scope to utilise this type of approach further, both formally and informally, through greater coordination across groups of councils in different areas.

Digitisation / channel shift

There is more that can be done to increase the efficiency of some elements of public protection services through shifting to electronic applications and processes. In Rewiring Licensing, the LGA called for the creation of a single business licence to reduce burdens for both councils and businesses. Government has responded by calling for the creation of a single online application process for licensing by 2018, and the LGA will be working with both councils and the Better Regulation Delivery Office to help implement this. There is also scope for further progress on electronic payments for licensing fees, including the use of direct debits.

Councils face the challenge of how they can continue to provide proactive support to local businesses as funding for public protection services reduces and resources are increasingly focused on high risk areas or enforcement. Critical to this will be the provision of simple, 'off the shelf' advice that is easily available on council websites, many of which are currently better geared to the needs of residents than businesses. Improving the accessibility of council websites to businesses – in line with the requirements of the statutory Regulator's Code – is one simple way that councils could ensure they are assisting all businesses despite the cuts.

Finally, councils should also consider whether public protection services are fully equipped for mobile working, in terms of IT provision, given the role of visits and inspections as part of these services.

Joint sector working on key issues

Councils must be ruthless about ensuring they are not reinventing the wheel but are taking advantage of best practice work from other councils. Where there is scope to collaborate on areas of work, this should be the default approach. As an additional benefit, this may also help to reduce some of the inconsistencies that businesses often complain about when dealing with different councils.

A joint approach to gambling licensing

Westminster, Birmingham, Manchester and Brighton councils are working together in relation to local gambling regulation. The aim of the work is to pool the experience and expertise of all four councils in order to develop a joined up approach to licensing policies and processes.

Other areas of licensing would appear to offer scope for this approach. Following revelations last year about the role of taxi and Private Hire Vehicles (PHV) in child sexual exploitation (CSE) scandals, councils need to review their existing processes and understand how to identify and address the risk of CSE through the licensing process. Again, there is scope for councils to utilise the best of the existing work that has already taken place in this area, through adapting other councils' work to suit their local areas.

With reduced resources available, it is more important than ever that officers are able to share good practice and jointly tackle common challenges. But increased resource and time pressures can make it harder to do so; there is an important role for the LGA, professional bodies and officer associations in supporting this as much as possible.

Outsourcing

It would be unusual, in a section focusing on the efficiency of how local services are delivered, not to reference outsourcing and new models of delivery, and it may be that they have a part to play in ensuring a sustainable future for public protection services. However, at the current time, the evidence does not support this conclusion. Compared to other services, there are relatively few instances of councils entering into public-private partnership arrangements to deliver regulatory services and all are part of a wider outsourcing package rather than a specific approach for regulatory services.

To date, only a few councils have taken up the option of outsourcing or created a mutual to run public protection services and there does not appear to be a developing market for outsourcing these services in their own right. Put simply, it appears that public protection services do not currently appear large or profitable enough for widespread outsourcing other than through much wider partnership arrangements or until such time as private providers sell some elements of these services from a base in one authority to other authorities. This is demonstrated by the difficulty in finding a private sector partner to run the Worcester Regulatory Services contract.⁶

Actions

Councils / officers

- Think about further scope for joining up relevant aspects of these services internally
- Consider scope for further use of lead authority approaches
- Ensure services are enabled to make full use of digitisation, eg mobile technology, websites etc

LGA

- Support pilot work across a range of areas
- Share good practice and case studies
- Facilitate joint working across groups of councils

Professional bodies / national regulators / Better Regulation Delivery Office (BRDO)

- Continue to develop and align qualifications / training where possible
- Consider scope for developing training / learning materials for non-professionals in core / basic aspects of the service

6 <http://www.ehn-online.com/news/article.aspx?id=13352>

- Maintain forums for sharing good practice and case studies

Government

- Remove nationally imposed obstacles to joining up, eg prescribed forms in licensing

3. Alternative management models

Alongside prioritisation and efficient delivery approaches, there is a need to think seriously about the appropriate management models for public protection services.

It has been argued in some quarters that there are elements of these services – although by no means all – that might be more appropriately managed differently, for example, at a regional level. That is not to suggest that shared services are the answer to the challenges in this area. This is belied by the fact that creating and sustaining them is incredibly difficult and – again as evidenced in Worcestershire – would not by any stretch remove the need for difficult decisions and hard thinking about the services themselves.

But the argument does recognise that aspects of these services are changing, and that the appropriate response to this might be to rethink traditional ways of managing them. Are nineteenth and twentieth century structures the right way to deal with the twenty first century problem of crime perpetrated over the internet? Is there scope to take further the regional models of delivery created by National Trading Standards; or to create more national units of the type the Elliot review into the horsemeat scandal envisaged will in future play a role in tackling food crime? Are some aspects of public protection services so important that there is a rationale for them to be managed independently of the pressures that councils will continue to face in other higher profile council services, when further cuts are still to come?

These are difficult questions, and there are no easy answers. But a pragmatic, realistic assessment of the future of these services should include at least some consideration of this issue. When aspects of these services are no longer very local at all, and councils are under growing pressure to manage specifically local challenges and services, it is worth asking the question: are our structures right?

Devolution

The heightened awareness of the case for devolution to English local government following the Scottish referendum is relevant here. In many ways, the legal framework for public protection services already affords a significant level of local control, as evidenced by the limited powers of direction available to national regulators and degree of local decision making. There is also, however, an unnecessary level of central prescription and micro-management, in relevant legislation, and in key areas (for example, betting shops) councils lack meaningful powers to respond to local concerns and take decisions that are right for local communities.

With some relatively minor changes, the existing framework could provide a solid basis for a devolved approach to public protection. Devolution does not offer a panacea to the funding challenges that councils face in any service area. In public protection, in contrast to some other areas, it does not even offer the prospect of unlocking centralised funding streams that can be used more effectively locally. However, what devolution would do is allow councils the flexibility to tailor their approaches to best address local issues and circumstances. The flexibility to scale up some aspects of these services or decision making, potentially to combined authority level, could well offer one way of better supporting these services into the future.

Actions

Councils / LGA

- Ensure smaller services do not get lost in negotiations over devolution

Councils / national regulators / LGA / government / businesses / stakeholder groups

- Consider the need / scope for alternative models in some aspects of public protection services

All of these could help reduce the pressures on public protection services. But given the scale of cuts still to come, and a general upward trend in demand for all types of public services, all this will probably not be enough: public protection services will be unable to do everything that they used to. A radically different approach may still be required, supported by a fundamental shift in the perception of responsibilities in this area. Put simply, what is the right balance of responsibility – across consumers, residents, businesses and the public sector – in a post-austerity state?

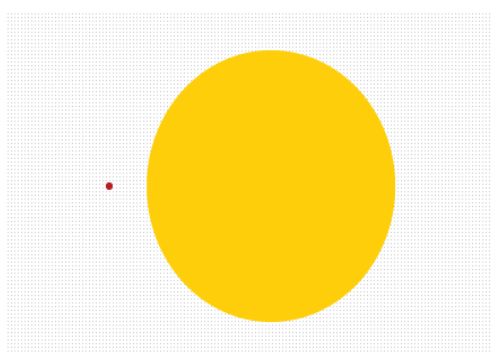
The Food Standards Agency (FSA) is the government agency responsible for food safety and hygiene across the UK. In developing its strategic approach for the next five years, the agency has very usefully illustrated the extent to which the resources the FSA and councils have to meet this responsibility are dwarfed by the resources of the UK food industry:

4. A new balance of responsibility

The sections above have explored the scope for greater clarity and prioritisation of public protection services, increased joining up of services, and different management models.

A small piece of a big picture

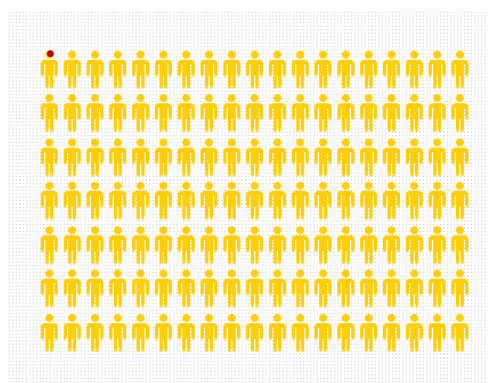
Expenditure makes up 0.08% of Food Sector Turnover



FSA and LAs Food Sector

Sources: FSA annual accounts 2012-13, FSA estimates of LA Food Safety and Food Standards expenditure 2012-13, Annual Business Survey 2012

Staff make up 0.12% of people working in the Food Sector



FSA and LAs Food Sector

Sources: FSA annual accounts 2012-13, FSA estimates of LA Food Safety and Food Standards expenditure 2012-13, Annual Business Survey 2012

Food Sector Food Product Manufacturing, Food and Drink Wholesale; Food and Beverage Services; Food/Beverages Retail Sales. Does not include Agriculture

In thinking about different approaches to public protection, we should start from the fundamental point that businesses themselves are responsible for food safety and hygiene - and indeed all other public protection requirements. If the traditional public sector model of enabling and enforcing this responsibility is being undermined as available resources reduce, there appear to be at least two alternative approaches to consider.

The first is to examine different ways of funding the existing model, so that businesses are responsible for picking up more of the cost rather than the state. In licensing, it is an established principle that businesses which benefit from a licensing regime should fund it; in other areas of enforcement, local government will seek to recover the costs of enforcement action against rogue businesses (although this is frequently unsuccessful). There is certainly scope for this principle to be extended more widely – and indeed there are active discussions at European level about extending a fee-based approach to oversight of food controls. Many councils have already considered the scope for recovering the costs of their work through fees or charges, and it is likely that more will do so in future. While this might not always sit comfortably with councils' business support / economic growth objectives locally, it is nevertheless an important issue to consider.

The second alternative would be a shift in ownership of some of these activities. Could some functions that are currently the responsibility of councils be overseen by businesses with a stake in them, rather than by the state? Should we move on from the recent trend towards de- and better-regulation and instead focus on a self-regulation mode? This would reflect the reality of constrained public funding and the fact that if councils cannot afford to support these services to the same extent, other parts of the public sector may be similarly constrained. Is there scope to make risk based judgements about the public protection issues that could reasonably be left to businesses to oversee, and those that are so important that the state

should always have a role? What personal responsibilities are incumbent on residents and consumers, alongside businesses and the state? What scope is there to learn from the very different models that exist in comparable Western democracies?

These are hugely challenging and contentious issues that society as a whole has a stake in. But again, a forward thinking attempt to create sustainable services over the next decade should include consideration of these issues.

Action

Councils / national regulators / LGA / government / businesses / stakeholder groups

- Consider the existing balance of responsibility and funding for public protection, and what can be learnt from other countries

Conclusion and next steps

This report highlights some of the challenges facing public protection services, and sets out some possible responses to these challenges. Some of these councils can, should be and are acting on now. Others are more difficult, and will require much more thought and discussion in order to establish if they are the best way forward.

What is clear is that doing nothing is not an option. There is very limited room for further cuts in these services without some hard thinking about both their core purpose / priorities and different ways of supporting them. It is incumbent on councils and local government, led by the LGA and supported by partners at national level and in business, to drive this forward and ensure public protection services are placed on a sustainable footing in future years. As we start a debate on how to do so, we welcome all thoughts on this via:

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