

22<sup>nd</sup> November 2017

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Head of HR Scotland  
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**Gordon Donaldson**

*Vice Chair, FES Staff Council*

Dear Rosetta

**FORESTRY COMMISSION TRADE UNIONS (FCTU) RESPONSE TO THE CONSULTATION ON LAND MANAGEMENT AND COMMUNITY AND VISITOR SERVICES FUTURE STRUCTURES PROJECT**

**Introduction**

The FCTU welcomes the opportunity of full consultation on the proposal for the Land Management and Community and Visitor Services Future Structures Review. We would also like to take this opportunity to thank all who volunteered their time to the review process and fully acknowledge the effort that has been put into the final extensive body of work that is the Business Case (BC) and its associated appendices.

Change within Forest Enterprise Scotland (FES) has been talked about for some time. Past Communication Meetings have highlighted the move to Scottish Government (SG) as a requirement following formal agreement between the SG and Westminster. This target has been accepted by FCTU, while anticipating the potential uncertainty for our members, the scale of change and the quantity of work that will have to be accepted and undertaken to achieve this target. National discussions currently underway with FCTU make it increasingly clear that the work required has been under-estimated and is currently running behind the schedule required to complete on time.

Understanding this and recognising that the internally generated, but much delayed Land Management and Community and Visitor Services Future Structures Project is being run alongside all the work required for the move to SG leads the FCTU to question the timing of the Review. Almost every member who has commented on the proposals or spoken with the FCTU has asked 'why now' and has not been convinced in any way by the Key Drivers as outlined in the BC or the information provided at Communication Meetings.

**The FCTU requests** that management acknowledge the level of work and deployment of resources required to achieve the move to SG, agree to delay any significant internal restructure until after devolution and recognise the need to include all pay grades in the one restructure project.

## Executive Summary

In addition to FCTU concerns about timing there are a number of other issues that call into question any requirement for change of this scale and the assumed benefits that a re-structure along these lines is claimed to make. (Further information on each of these points below is included in Appendix 2).

1. Recent communications meetings highlighted a wide range of success stories delivered by staff under the present structure. Programme and financial targets were exceeded and results from UKWAS audits are excellent. The mismatch in messages from Senior Management has been widely noted.
2. With the Scottish Government Devolution Programme (SGDP) and associated Projects, management and FCTU are only starting to understand the enormous amount of work required to support the move of FES to become an agency of the SG (if that is the final position of the SG). To achieve a successful landing will require significant staff time and energy, which should not be distracted by unnecessary internal reorganisation. Many members have questioned the failure of the FESMB to properly account for the resources required for this change.
3. Reference is made in the documents to the need to align with the FESMB 3 + 2 model, though this is omitted from the drivers for change. This was raised at the Staff Council, as no consultation has taken place with FCTU on this change. The formal response to this does not provide a sufficient answer to the points raised.
4. General comments on the Drivers at both the communications meetings and in FCTU consultation meetings were that these do not have any detail. The sole example offered in five drivers, to demonstrate the need for change, is simplistic and does not support the statement requiring an improvement to management capability. Members felt that these were assertions or 'management speak' with no evidence.
5. The resources included in the BC as needed to support this proposal are inadequate and if properly calculated would reduce the savings claimed and show it to be undeliverable in parallel with the need to arrive in SG on 1/4/19.
6. The timetable for implementing the proposals at PB1-4 would have been almost unachievable even if begun in September. It is now impossible. The proposal for review of PB5-7 to be delegated to the Regional Managers shows the compromise required from the original process in order to meet an artificial deadline. This also calls into question the claim to seek consistency in delivery.
7. Major change like this impacts on the stability of the organisation. This has been clearly seen during the Decentralisation of Shared Services, where many staff who were expected to move across to the countries have chosen to make alternative choices, including leaving FC. The result is a significant loss of skills and experience. Impact on colleagues is likely to be serious with effects on delivery. This shows further the failure of the FESMB to account fully for the impact of the compulsory (SG) move in choosing to implement change under their own control.
8. It is not yet clear whether changes will be required to priorities and organisation once we arrive in SG. To make major change such as this, before that is clear, is pre-emptive and potentially wasteful.
9. If Community and Visitor Services requires additional resource, standard Business Plan processes following agreement at FESMB will allow for that implementation.

10. For Option Appraisal, the BC claims the options have been scored with objective criteria. There is no evidence given to support this. Criteria have been selected with no justification for the choice. They are subjective criteria which have simply had figures applied to them.
11. Regional staffing proposals is an area that has generated deep dissatisfaction among TU members. The proposal for a uniform structure across all five regions is viewed with disbelief.
12. Widespread comments from members have refuted the claim that increased travel will impact only the Regional Managers (RM). All PB 2, 3 and 4 staff will need to undertake significant extra travel to cover their wider areas and others could be impacted, too.
13. The present structure for FES staff, created by management selectively upgrading groups of staff in specific roles, has always had an element which has been criticised by the FCTU. It has reduced opportunity for progression for staff within their areas of competence by increasing the level of grade skipping required. When the decision was taken by the FESMB to undertake this project it was expected that this would be an area where the situation would be addressed. The proposals, however, make matters worse.
14. The BC suggests that there will be benefits on staff Wellbeing following implementation. At present the statistics produced by HR around Health and Wellbeing would suggest that this is already in decline. These proposals will increase this problem as a result of fewer staff being asked to maintain the same output resulting in increased stress.
15. Without evidence, the proposal claims that a wide range of apparently required improvements will be achieved. The FCTU do not accept that it is possible to achieve consistency with less process, and greater flexibility in delivery to adapt to priorities, with fewer staff.

## Conclusion

**The FCTU reject** the proposals as drafted. There is hardly any support for the move to Regions, nor the development of a tentatively linked specialist Visitor Services function, either to a 5 region or 10 district set up.

**The FCTU recommends** that to deal with current issues raised in the BC, the following action should be taken.

The communication issues, although not highlighted at delivery level, can be dealt with by providing clear and unambiguous statements from the FESMB of direction to all FDMs and AOMs in the area of H, S & W management.

In addition, the area commonly described as scope of control, specifically in this case for the Head of Land Management, should be resolved by either:

1. reverting to the pre 1<sup>st</sup> April 2016 structure at Board level, or
2. retaining the existing structure at Board level and extending or making permanent the existing Transition Manager's post.

It is also recognised that there are a number of staff, members and non-members who have for the past two years or more operated on TRA. It should be acknowledged by management

the work they have put into maintaining the organisation going forward and their efforts rewarded.

**The FCTU recommends** that all staff on TRA for more than 6 months should have their position confirmed at the higher grade on a permanent basis.

**The FCTU recommends** that if management, following the successful move to the SG, are still of the opinion that structural change is required, then a full review, fully supported by the FCTU, is undertaken covering all pay grades, after it is determined exactly what the agency Forestry and Land Scotland (assuming this is what is agreed by the SG) is tasked to undertake and where.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gordon Donaldson', with a stylized flourish underneath.

Gordon Donaldson  
**Vice-Chair, FES Staff Council**

Appendix 1 – FCTU Consultation process

Following the publication of the BC to all staff and the conclusion of the subsequent Communication Meetings run by management, the FCTU held a series of meetings around Scotland to canvas opinion from TU members on the proposals. At these meetings representatives of the FCTU asked those attending to take part in a ballot at the start of each meeting, before any discussion had taken place, on a range of five options. Those options were:

1. Accept the proposal as outlined;
2. Accept the bulk of the proposal but seek additional posts in agreed key areas;
3. Reject the detail of the present proposal but agree the principle of the two tier structure based around a National Office and 5 Regional Managers;
4. Reject the proposal in its present form while accepting some form of change is required but retaining the present national office and 10 district set up;
5. Reject the proposal in its present form outright and seek a continuation of the present structure.

These initial votes informed the discussions at the meeting. For example, as most of the voting was for Option 4, members were asked to identify areas they thought required some change. The voting around Scotland from TU members who attended the meetings was fairly consistent across the country:

Option	1	2	3	4	5	Totals
Votes	3	16	19	147	36	221
Percentage	1	7	9	67	16	100

Over 80% of those attending not only opposed the proposal but also wanted to remain within the existing 10 district set up. The FCTU recognise the call (67%) for some required change within that 10 district structure.

In addition to this a number of TU members were unable to attend the meetings and chose to email their opinions. Overwhelmingly those comments were opposed to the proposals.

## Appendix 2 – Additional information

1. Response to the Communication Meetings has been universally negative. Although the messages of the widely enjoyed success of FES were relayed to staff, no attempt was made to show how the re-structure would continue to build on that success. Questions were asked on job security, future responsibilities and improved communications. Throughout all meetings the members' perceptions of the answers given were that these were evasive or meaningless platitudes. One pertinent quote to the FCTU was 'if this is the answer, what was the question?'
2. FCTU has been pressing for many months for clarity on plans for the move into SG and accepts that FES management has also been unable to discover the detail required. However, we have received advice from full-time Union officials on what has been involved in previous moves of this kind and have made the point on many occasions that there is a lot more to consider than is often expected at the start. In particular, assumptions have been made about when changes to Terms & Conditions will be considered and, until that is clear, the workload cannot be determined. We have recently had an invitation to meet Bridget Campbell to discuss these matters, and we hope this will start in late November.
3. The BC does not highlight the 3+2 model as one of the drivers for change. This is a key omission as **Section 2.2 Forest Enterprise Scotland – Organisational Redesign** states that '*A previous review of functions by the FES Management Board had determined that the organisation would be structured around a 3+2 model*' with further references to the model elsewhere in the BC, again significantly in relation to the need to review structures in **3.1, Objective 1 - Implement a streamlined, adaptable and affordable structure across Land Management and Community and Visitor Services which will reflect the 3+2 management structure**. Also **Appendix 2 Issues Analysis - The "3+2" structure currently only exists at national level**. At no time would the FCTU look to prevent the CEO or the FESMB from making decisions which impact on the Board, however there is an expectation that the consequences of any decision taken at Board level regarding their structure and how this may impact staff throughout the organisation should be fully consulted with the FCTU. It should be noted that the FCTU are angered and frustrated by the inaction to consult on this change and its consequences, which calls into question the agreement that exists between Management and the FCTU to fully consult at the outset of any proposal. It is unacceptable for consequential changes to be presented some years later and only when the alterations made at Board level are perceived to impact negatively on Board members.
4. Drivers - Staff were particularly disappointed with both the quality of presentations at the Communication Meetings and responses from senior management, which simply continued to assert that it would be better, with no further justification. We have noted above (Point 3) the failure to include the 3+2 structure as a driver as this is clearly a major factor in the development of the proposals.

### a. Management Capability

The FCTU fail to see how the proposal can possibly result in improved management capability. The proposed reduction in staff is designed to create a simplification of structure which, as there is no evidence provided, can only be claimed will increase management capability. To improve or increase management capability requires support and training of existing staff through the recruitment of additional staff or those with the skills that are deficient. It is also the case that reducing staff where decisions are being

made could potentially reduce capability, as those removed from the structure take skills and experience with them. No real evidence of any reduction in workload has been produced other than the presumption that some former AOM/AAOM roles will have less work in compiling BP's, BMR's and discussing through programme changes. These minimal savings do not justify the loss of 12 posts.

#### b. Staff and Resource Management

In 2004/05 the initial Operations structure was set up. Over the intervening years there followed the addition of posts, adjustments from functional to beat delivery for some and various grading reviews. This has resulted in the bulk of the apparent concerns described in the BC. At the time the FESMB informed a resistant FCTU that an Operations structure was essential to address concerns from the private sector around the transparency of our accounting and the number of individuals the trade were dealing with at districts across Scotland. This new proposal would retain the present level of communication for the trade. However the creation of the Head of Land Management post and the addition of Stewardship to the Land Management role at Regions would clearly impact on transparency of accounting. This proposal reverses a key driver for change at the time of the setup of the Operations structure. As a result, we question both the need for this restructure and that the consequences have been fully thought through. Yet again the proposed solution to one perceived problem, creates new issues elsewhere.

The existing structure does have some over-stressed specialists and the moving of 4 PB4's into the Land Management function is noted. However what is the price of this action? The addition of Stewardship and all that entails to the individuals in those roles will create over-stressed generalists. In addition, reduced quality and quantity of work delivered on environment and recreation projects. The stewardship model will not reduce confusion nor improve management accountability. It will do the opposite by adding a layer of communication between specialists and delivery managers and make it more likely for delay or omission through lack of ownership.

#### c. Statutory Duties and Risk Management: Health, Safety and Wellbeing

The proposed structure would result in an individual with overall responsibility across a significantly increased geographic area and number of staff. Consistency of delivery from staff across the region will then become the issue and will load the Regional Manager's role. Any lack of clarity in H&S responsibilities with the present structure can be dealt with through the Local H&S Policy and its communication to staff.

Procurement, finance and contract management have recently become major elements of delivery. To tackle this, increased resources, support, training and advice is what is required at a local level within the existing structure. FES has concentrated resources in recent years on improving capability at the centre, with little regard to also improving local delivery.

No individual at present is minded to carry out their work in a manner that does not achieve what is required. Moving the existing staff into a new structure without guidance and support will not improve the quality of their work but will severely and negatively disrupt existing delivery. If that support and guidance is to be given it should be used now in the existing structure to gain immediate improvements that will take the organisation forward.

#### d. Efficiency, Quality and Stakeholder Experience

The development of the Operations structure was designed to clarify how we operate for staff, the timber trade and merchants, providing increased focus on quality of delivery and service for the FM and H&M roles. Environment and CRT teams in FDs further enhanced that clarity for both internal and external stakeholders.

The proposal to include Wildlife Management, Environment and Stewardship delivery in the Operations Delivery Manager role and their FM, H&M and Stewardship Managers loses that clarity. Fewer individual staff working across a larger area will have to deal with a range of competing priorities and competing external pressures as individual members of the public, community groups, merchants, companies, contractors and stakeholders press for their attention.

The suggested move to Regions greatly increases the number of stakeholders within any Region. The proposed Regions would produce a more difficult experience for some closely aligned stakeholders such as Forestry Commission Scotland (FCS) and the National Parks, whose existing management boundaries would not align.

e. Flexibility and Resilience

There is little if anything in the proposal that provides clarity on how the proposed structure will improve flexibility and resilience to changing policy and economic priorities. The best way to achieve a fast and consistent response is to have clear direction and resources to deliver. This proposal sets out a reduction in staff and a move to more generalists, which will increase the chance of a change in policy delivery not being tackled due to competing priorities or a lack of ownership of the issue.

The existing structure with its clarity of delivery on mainly a functional basis assures that any policy change will be delivered by specific staff that have a vested interest in the area of work and have few distractions from the work in hand.

- 5** The level of resources estimated to support the changes required to underpin the proposal are inadequate. It is impossible to believe that the level of HR support will equate to 1 PB 6b member of staff for a year. The trawl, interview administration, appointment process, assimilation and possible redundancy management will be ongoing for much of 2018 as the 80-90 staff impacted by the proposals are managed through. No account has been taken of the costs incurred already, except for the meetings of the project team.

It is openly admitted in the BC that IT support to underpin financial management of any new region will not be in place and that some if not all of the proposed boundary changes would not be dealt with for the first three years. This backs up our contention that this is not the right time to consider major change such as this.

In criticising the proposals, members have raised considerable concern about the Change Management posts. The elements of their job description are essential to the smooth and complete running of any unit. It is impossible to think that these posts or the work they do would not be required on an ongoing basis.

The FCTU notes that no additional costs due to staff movement to fill posts have been calculated as part of implementing the plan. Careful consideration by the FCTU of the potential options for assimilation, suggest it is highly likely that some staff will be required to relocate. If this is the case then the costings are inadequate. Costs have been identified in the proposals that only cover the transition process. At the Communication Meetings, it was accepted by management that additional overnight stays would be required. This cost will be annual, not one-off, and is not included in the figures.

- 6** The original timeline for the completion of the BC was in June 2017. This was delayed until September 2017 some 3 months late. Following the publication of the BC and its associated papers management rightly held a series of Communication Meetings. A change of this scale could not be expected to meet the minimum 30 day consultation period and the Project and Programme Boards were informed of this well in advance of publication of the proposals. Management also took 20 days of the consultation period to complete their own staff briefings, with the chance for questions to be asked and answered face to face before staff could take a considered view of the proposals. It is noted that management are now suggesting that if agreement were forthcoming about

the proposal that the PB1-4 post filling will now run further into FY 18/19. No clarity has been provided on the impact on review of PB 5-7 in 2018. This is not achievable and post placements would take up unacceptable amounts of management and HR time from the main area of work, the move to SG.

- 7** Major change such as this will always have a detrimental impact on staff. If the proposals are clear for all to see and understand, even though some of the messages are difficult for individuals, it is the case that the majority of staff will buy into the change. As a group of staff, most within FES have embraced change before and made things work. In this proposal the reasons for change are not clear. The most tangible thing is that by suggesting the removal of posts, money will be saved. At the Communication Meetings, under questioning, the Board said the proposal was not about saving money, but did not take the opportunity to expand on why it was being done. The BC makes this no clearer and as a result most of our members are finding their loyalty to the organisation stretched, for some to breaking point. Others recently, of course, have left. Many of the dependencies in Appendix 13 have already been missed. Some apparently have been delivered, but in reality communications, for example, have not worked as intended. The FCTU would also suggest that proposing a structural change, the detail of which leaves out the majority of staff, while that group of staff know that dependent reviews such as the Civil Engineering, Harvesting and Deer are either underway or to start, does not build confidence with that group of staff. The dearth of information whilst the over-riding belief for staff that change is likely, creates the perfect situation for a wide range of negative speculation. This has resulted in a large and important group of staff who are now disillusioned, frustrated, worried and with very low morale.
- 8** It is fully acknowledged, and in the main welcomed by staff, that FES is to move to the SG in 2019. At this time staff are aware that there is a planned name change. With the addition of 'Land' to that name there is understandable interest in what changes this may mean to how and what we do at present. There is therefore a significant view that is asking why changes are being proposed now, when there is no knowledge of the scale or breadth of work we may be asked to take on in future. Our members are amazed that we are not concentrating our efforts and resources solely on the move to the SG. When there, and bedded in as the New Agency, there would be a case to seek discussions with the SG to establish what is expected of the New Agency and only then build the structure from PB7 to PB1 (or further if required). By doing this we would have time to establish improved procurement, finance and contract management, complete reviews on Deer, Civil Engineering and Harvesting so these can inform our delivery model and staffing.
- 9** The aim to increase income generation from Visitor Services (VS) and the development of a dedicated team to achieve this is understood. However we do not believe this can only be achieved via a 5 region set up, or that every region or district is best placed to deliver on increased income. The FCTU propose that targeted management resources and training for management staff in those areas where the greatest income increase could be made, would resolve this. Doing this within the existing set-up would maintain the strong links for VS managers to their field staff rather than moving to a structure that un-necessarily increases the complexity of delivery for the VS manager. The FCTU views that the proposed changes will not materially enable improvement. If implementation of the structure was to take place as proposed, these gains will not be achieved as the proposal does not create the simpler structure, with the Land Management and Visitor Services functions maintaining that complexity.
- 10** The analysis of the four options included is barely credible. Disparity between the lists of benefits and risks for each has caused widespread comment. It is obvious that benefits for Option 3 have been emphasised beyond their value, with many being assertions and hopes, backed up with no evidence. Notably absent from the Risks is potential failure to

deliver due to the significant reductions in staff, or any effect of the changes on the move to SG.

With little scrutiny it can be seen that apparently more than 55% of the perceived scored benefit of implementing option 3 rather than option 2 (the next highest scored) is attributed to 'Flexibility to Change' and 'Capacity to Deliver Organisational Priorities'. The increased score for Option 3 across these two areas and the size of the differential created to Option 2 is based, in our view, purely on hope.

The score for 'Wellbeing – Effect of Change on Staff' has understandably, if subjectively, been scored lower for option 3 than for Option 2. This is how the scores should align due to the issues for staff moving to a new structure. However the level of Wellbeing of staff remaining in an existing structure with the reversion to Operations within a district (as Option 2 offers), clearly should score significantly higher than is attributed here. Subjectively, the FCTU contend that increasing the differential here and reducing as it should be for Flexibility and Capacity would almost certainly negate the created differential in the BC that has led Option 3 to be selected as preferred.

An alternative way of considering Benefits and Risks would be to look at the effect of each one on each Option and compare the effects.

- 11** With very few exceptions there are no differences in structures for each Region. Members are incredulous that a BC that has taken so long to develop can fail to recognise the programme variations across Scotland. **LM CVS Job Specs** in Option 3 sets out the potential variations across a range of programmes for a number of those new posts common to every proposed Region. However no attempt has been made to recognise this difference between Regions with appropriate staffing mirroring programme variations. The FCTU believe it cannot be assumed that larger programmes in one function, such as harvesting will be offset by smaller programmes in others. On the contrary, it is likely that one large programme will lead to other large programmes. Programmes can vary significantly from year to year, for example, the figure for peatland restoration programme in NH FD for 2017/18 is currently 2000ha while the Job Spec quotes a maximum of 200ha. This is recognised as a one off funded programme, but is typical of the ability of FES to deliver SG priorities, due to its flexibility and a passionate, committed staff. Our feedback is that this commitment is now under severe strain. It is disappointing that the Appendices included in the paper are not up to date. Despite the delay of publication to September, Appendix 1, Risk Register, was last updated in July. Use of the Register seems deficient, too, in that none of the Risks are deemed sufficiently of concern to raise with FESMB, despite scoring red even after mitigation.
- 12** The fact that significant travel time is already the experience of senior managers, as described at the communications meetings, is not a good reason to accept this across a wider group of staff and as a model will not lead to higher levels of efficiency. With the increased area to manage, the Regional Manager will spend an increased time travelling. This simply leads to the increased downtime due to extra travel etc costing more per hour. The answer should be to work within the present structure to manage this out, so resolving any issues with management of the existing staff at PB2. Comments elsewhere in the document alluding to an interest in wellbeing do not match with a structural model that reduces productive working time while most likely impacting on health by increasing workloads, through the overall reduction of staff and the increase of travel time. Concerns have been raised about the potential impact on staff with family responsibilities, which is acknowledged to affect female staff more than males. Management stated at the Communication Meetings that they want to encourage younger members of staff to join FES, but policy such as this will be a disincentive for applicants and potentially discriminatory. We would like to see an EqIA on this aspect.
- 13** The answer to staff progression appears to be to reduce the number of PB4s so there are fewer to progress. Despite the comment from senior managers that the opportunity to

grade skip is available this is perceived as a real barrier to staff and has already resulted in demotivated staff. It has been suggested that the route to progress is to seek posts in FESHO, many of which are specialists. The proposal to create VS posts with essential qualifications in hospitality and tourism rules these out of contention for the majority of staff seeking promotion, so staff will have to relocate, if they can reach agreement with family. This has demonstratively proved more difficult in recent years and has a disproportionate effect on those with family responsibilities.

- 14** There is reference that the proposal will improve staff Wellbeing . This area of work is a specialism with little experience in FES. Advice we have is that the effect of this sort of change will increase stress significantly. We draw attention to the absence statistics presented at the recent FES SC, showing a significant rise over the last few years. The effects of the Communication Meetings has been severe, with widespread disillusionment reported, questioning of why members should remain loyal to the organisation and a feeling of disconnect between management and staff.

**15** How Would the Proposed Changes Enable Improvement?

a. A more joined-up organisation

The proposed restructure will not provide the integration suggested. The development of separate Land Management and Visitor Services functions will ensure that. The FCTU contends that reverting to the delivery of operations from a district set up (now only 10) would not only provide the straightforward lines of communication from national to local teams but it would also ensure that local joined-up delivery was achieved at a scale which is more recognisable to the public and community groups.

b. Simpler, more consistent and easier to work with

Any complexity with the existing structure is a result of changes at Board level. The proposal makes great play of removing this self-inflicted position. However no solution is found as the proposal clearly results in continued complexity although in a different area. By removing the apparent Board difficulties around the Operations/District relationship it creates a Land Management/VS complexity that the Regional Manager will be tasked to deal with, while having no influence on the Region's VS staff. So the suggested difficulties and deficiencies of the existing structure which only the Board perceive, will not be removed via implementation - at best the issue moves. We note also that the title of Head of C&VS would need to change under the current proposals, as responsibility for Communities would move to Land Management. We question the claim that communication would improve in a Regional structure. This may apply to national office to RM, but over-stretched staff below this will not improve further spread of information. We have feedback that communication is more clearly understood and taken on board when coming from people seen regularly, with whom good relationships have been built. The unreasonable geography of these regions will prejudice those relationships.

c. Well Balanced

The suggested balance is not apparent to the FCTU within the proposal. With specialists concentrated to Deer, Civil Engineering and Visitor Services the increasing reliance on generalists to deliver the wide ranging scope of Land Management will almost certainly result in quantity and quality control issues while staff struggle with onsite prioritisation due to the pressures of day to day delivery and the competing interests of merchants, contractors, neighbours, visitors, community groups and other stakeholders. The lack of any detail and subsequent assurances at the Communication Meetings around the capacity to increase both the scale and the development of resources to the front line has

caused grave concern to members, who report widespread demotivation and demoralisation.

d. Clear roles and responsibilities

The FCTU find it surprising that there is apparently a lack of clarity around the responsibilities on H&S, team leadership and financial control after 11 years of this structure. This is not what members at district level report to be the case and the FCTU can only believe this is as a result of the implementation at Board level of the 3+2 model.

e. Operating at larger scales

There is no doubt that moving to 5 regions would result in working across wider bio-geographic zones. Work is underway on a Spatial Strategic Plan, which is believed to inform work on this matter. Making early judgements on where this may lead devalues the work, which may inform geographic focus, skills required and resulting management structures.

However this would not automatically result in a significant increase to the strategic approach to land management. There are few woodlands that exist on the boundaries of the existing district set up. Where this is the case such as at Ballachullish or Tyndrum the Planning Managers/FDMs and Conservators are aware of this and ensure collaboration across the boundary. Moving to 5 Regions would not negate this requirement, plant health, wind blow and other catastrophic events do not respect boundaries and the simplistic merger of pairs of FDs, with a few tweaks of boundaries, shows little attempt to truly consider issues which may bind areas together.

The proposal is indicating a reduction of staff which amounts to approximately 14% of all the PB1-4 posts. However, at the point of delivery in the proposed regions this would amount to an almost 20% reduction in those PB1-4 staff. This is an unprecedented cut in resources and resulted in incredulity amongst members. The proposal is expecting incorrectly that the existing quality and quantity of Environment and Visitor Services delivery will be met through a more complex line of delivery managed by fewer staff. Nothing in the proposal provides confidence to the FCTU that this is possible.

The flexibility to adapt to priorities exists within the present set up. Staff already work across district boundaries if required, for example when fighting fires. In the past at times of wind blow, both machine operators and management staff have volunteered to be re-deployed. Travel now, although daily commutes should be minimised, is much easier to achieve. In many cases travel to the next district is not insurmountable to deal with a challenging situation, so we do not have to restructure to get this to happen.

f. Capability to improve visitor services

The sole example of improvement is to increase income from recreation. This fails to recognise the work of most FDs, whose current focus is on delivering the many outcomes required of a range of SG policies. Increasing use of forests for mental and physical improvement, BAME groups, education, community involvement and informal recreation, are core to the high value placed on FES by SG. None of them is about increasing income, but deliver a sustained future for the organisation, with political support. Members have been deeply hurt by this undervaluing of their core work.