



CONSULTATION RESPONSE

Civil Service Commission Consultation: Proposal to establish a Public Services Commission

ISLE OF MAN GOVERNMENT
AN AGENDA FOR
CHANGE



**Isle of Man
Government**

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Response to the Consultation on the proposal to establish a Public Services Commission

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1. Introduction and Executive Summary

- 1.1 This consultation exercise was designed to invite comments on the proposal to establish a Public Services Commission (PSC) as employer of not only civil servants but also other categories of employee including manual and craft workers employed by Departments and Boards, under Whitley Council Terms and Conditions, and some other employees across central Government; principally those whose terms and conditions are analogous to the Civil Service or the Whitley Council.
- 1.2 A total of 489 responses were received, 385 written responses and 104 responses via the online survey. Of the total number of responses, 466 were from individuals, with the remaining responses coming from Departments, Local Authorities, Unions/Staff Associations and external individuals and organisations.
- 1.3 Of the 466 individual responses received, 52 were from civil servants and 386 were from staff employed under Whitley Council Terms and Conditions. The remaining 28 individual submissions came from staff under terms and conditions other than Civil Service or Whitley Council and from individuals external to Isle of Man Government.
- 1.4 It should be noted however, that the majority of the 386 responses received from individuals under Whitley Council Terms and Conditions were identical which suggests that a standardised response to this consultation had been prepared. These respondents were opposed to the establishment of a PSC, citing that Whitley Council 'works well' and that this proposal is a 'waste of time and government money'. It is evident from the responses received that answers to all four questions posed had been made on the assumption that Whitley Council Terms and Conditions will automatically be changed by the creation of a PSC, despite this not being the case.
- 1.5 In addition, whilst approximately 80% of responses came from Whitley employees, it is noted that following a request from the Employees' Side of the Whitley Council, approximately 2000 blank response forms were provided to encourage Whitley employees to participate in the consultation. However, less than 20% of manual and craft workers responded to this consultation. The reasons for such a limited response are not known but perhaps suggest that the strength of opposition of a minority, to the creation of a PSC, is not indicative of all manual and craft workers.
- 1.6 Any changes to terms and conditions for existing staff would require consultation and negotiation. Many also assumed that the PSC would become the sole decision maker regarding terms and conditions of employment. This again is a misapprehension as negotiating mechanisms regarding terms and conditions will still be required upon the establishment of a PSC with representatives from both the employer's and employees' side being present at the appropriate negotiating forum.
- 1.7 With the exception of the responses mentioned in 1.4 above, the majority of respondents were supportive of the move to create one employer for civil servants and manual and craft workers, seeing this move as a sensible way forward. There was also a strong view that the creation of this single employer for civil servants and manual and craft workers was long overdue with the need to reduce bureaucracy and improve consistency in the management of staff through the harmonisation of policies and procedures, such as discipline, capability, sickness absence etc.
- 1.8 All comments or suggestions received have been considered and captured in the response spreadsheet. A copy of this spreadsheet may be viewed on the consultation website at www.gov.im/consultations.gov

2. Consultation Process

- 2.1 On 22 April 2013 the consultation document was published on the Isle of Man Government website and was also issued direct to consultees. Responses were initially invited to be submitted by Friday 31 May 2013. To accommodate consultees this deadline was extended to 14 June 2013.

3. Consultation Results – summary of responses to questions posed

3.1 Question 1:

Having regard to the intended scope of employment groups to be included, which employment groups do you think should be included within, or excluded from, the remit of a PSC and if so, why?

Of the 7 Government Departments, Boards or Offices that responded, 6 were supportive of the establishment of a PSC with some of the benefits being described as:

- the opportunity to ensure fair and equitable treatment for all employees
- helping to promote a fully inclusive team
- harmonisation of policies and procedures
- improving efficiency and effectiveness of key staff management processes such as payroll and absence management

One Department stressed the need for the PSC to have flexibility to accommodate unusual employment contracts such as seasonal, casual, term time only and training posts. Another stated that dealing with multiple terms and conditions, procedures and allowances creates confusion and tension between employee groups particularly when delivering cost improvement programmes.

A quarter of responses (excluding those from manual and craft workers) suggested that all groups which are paid by the public purse should be included within the PSC even those employment groups which have links to the UK for pay and terms and conditions. Several respondents suggested that unless all government employees were included the exercise would not be worth pursuing.

The introduction of consistent terms and conditions for both Civil Service and Whitley Council was seen by some respondents as beneficial as frustration continues to be expressed with the time spent adhering to multiple terms and conditions of employment in respect of discipline, capability, grievance, annual leave and sick leave provisions. In addition, the potential to rationalise allowances, review out of date agreements and introduce a single job grading system was seen as positive.

Other benefits to be gained from the establishment of the PSC were stated as the freedom of movement for succession management purposes, consistent and fair processes for negotiation of pay and effective control of headcount.

346 respondents (staff under Whitley Council terms and conditions) opposed the establishment of the PSC - citing these main reasons:

- Whitley Council works well already and there is no need for a new body.
- A waste of tax payers and government money.

Many of these respondents alluded to the fact that they believed their terms and conditions would be changed as a result of the establishment of a PSC in an attempt to cut costs. As mentioned in 1.4 above this is a clear misunderstanding of the remit of the PSC.

A number of exclusions were suggested by those who were in favour of the PSC and are:

- The Wildlife Park - citing that any further erosion of terms and conditions would negatively affect animal welfare and indeed the quality of the public service currently provided.
- Estates Maintenance Health, Operations Division of the Department of Infrastructure - should be excluded as it works very well as it is and with a few administrative tweaks, could be great.
- Social Workers and Health Workers as it was felt it would be more difficult to attract these professions to the Isle of Man.

The Department of Education and Children and its respective Union indicated that Teachers, Lecturers and Education Support Staff should all be excluded for a variety of reasons including its current flexibility to structure its operations within tight budgetary timescales and redeploy staff as required.

In its response, the Public Sector Pensions Authority (PSPA) indicated that it does not believe that it would benefit its future plans to be part of a PSC. This belief is based on the PSPA's requirement to be impartial in determining and advising on future pension policy, its work being specialist and technical in nature resulting in it having very different recruitment needs to other parts of the Public Service and it having its own year-end review, training and disciplinary procedures and processes which suit its business needs.

In terms of responses from Trades Unions, Prospect/GOA stated that it was broadly in agreement with the scope of the text set out in the consultation document under 'Membership, Functions and Scope' on page 12. However they stressed that it was virtually impossible from this document to decipher what the practical arrangements and impacts would be or what is envisaged, and sought an assurance that unions are provided with a decisive say in the future elements of a PSC as outlined in this section.

There was, in fact, some concern expressed by a number of respondents that the consultation document did not provide sufficient information to allow any determination of practical arrangements and impacts that would be envisaged by the creation of the PSC, making it difficult to comment on which groups should or should not be included in the scope of the PSC.

It is important to emphasise however that the consultation was aimed at exploring the principles and not the detailed arrangements of a PSC. The detailed arrangements will be subject to full and open dialogue with relevant Trades Unions.

Unite the Union (Regional Officer) stated that it was important that all established groups remain involved due to the specialist knowledge they have acquired, which could circumvent unseen repercussions any changes to terms and conditions could invoke, and therefore none should be excluded. The response of the Employees' Side of the Whitley Council to this question was that all should be excluded, none included.

3.2 Question 2:

Do you support the development of a single Joint Negotiating Committee for employees of a Public Services Commission? If not, please indicate possible alternative arrangements.

48 respondents were in favour of the development of a single Joint Negotiating Committee (JNC) for employees of a PSC.

However, it was also suggested that the negotiation of existing terms and conditions should be dealt with by separate sub forums with equal numbers of representatives from each Union or staff association with stronger provision for management representation being seen as advantageous and allow for more relevant management engagement in the negotiating process.

The Department of Infrastructure has a number of different structures and mechanisms for employing staff which invariably means that at any one time the Department is dealing with a number of different employing bodies, representatives, differing terms and conditions and also local service agreements. To this end a single employment body would be helpful in ensuring equality in dealing with all employee terms and conditions. The Department also believes that a much stronger provision needs to be made for management representation on the negotiating committee. It went on to add that a wide ranging structure should be considered such as the establishment of sub-committees with delegated responsibilities from the main committee but would allow far more relevant management engagement in the process. The sub-committees could be given the remit to develop, implement and monitor the effectiveness of various areas.

Examples of sub-committees suggested were:

- Pay and Incentives
- Disciplinary Procedures
- Performance Management General
- Capability
- Culture
- Local Agreement Monitoring
- Advice and Guidance on the Setting of Precedent

It was suggested that these sub-committees could be responsible to prepare regular reports that would be published to the PSC and to management to help disseminate an understanding of issues and to compare and contrast performance against a broad range of metrics in different areas.

Concerns raised with the establishment of a single JNC were the domination of one Union over others as a result of size of membership and the differences in the terms and conditions of civil servants and Whitley Council manual and craft workers are too great for one JNC to be able to manage these 2 distinct groups.

The Department of Education and Children commented that currently, the collective bargaining arrangements it has in place are education focussed and enable it to be pro-active in relation to educational drivers for change in negotiation/consultation with unions and staff representatives working mainly in the educational field. A PSC which included any educational staff groups would inevitably mean that such education specific changes would not be as straight forward to achieve in future as such changes would have to be consulted upon/negotiated across a wider non education focussed group. Hence, issues on which the Department can be pro-active at

present and which can currently be achieved within a very tight timeframe may take many months in future which would be of considerable detriment in a service subject to frequent change.

One respondent commented that the greatest saving in time and effort will be the abolition of Whitley Council which is archaic, cumbersome, duplicitous and of no purpose when national unions can provide the required input at JNC level.

The majority of manual and craft worker responses (98%) did not support a single JNC stating that they were happy with Whitley Council and that Whitley Council was not broken and therefore, should not be changed.

The Employees' Side of the Whitley Council stated that the Whitley Council served its purpose. Unite the Union (Regional Officer) stated that 'one size fits all' approaches to problems always caused contention to some part of the establishment, and therefore the JNC arrangements should be left as is.

Prospect stated that it would be supportive of a forum which reflects current membership of unions and provides a balance, whereby representation on such forums would have to follow an equalised approach. In terms of pay, Prospect indicated it would see advantages in this approach but it would seek balanced and equal membership in such a forum. Prospect also stated, however, that existing terms would be better handled via the existence of separate sub forums set up solely to negotiate terms and conditions for the groups suggested in the document. Such sub groups would need more weighted membership from unions to reflect the balance of membership which currently exists in current forums.

3.3 Question 3:

Please indicate your preferred arrangements for determining the terms and conditions of service for manual and craft workers employed by Local Authorities who would not become employees of a PSC?

With the exception of the manual and craft worker responses, which indicated their wish to keep the Whitley Council Memorandum of Agreement, the preferred arrangements suggested by respondents were:

- That local authorities adopt whatever terms and conditions are agreed by the PSC, by analogy.
- That local authority representatives be present at a PSC negotiating forum.

The 'by analogy' basis was considered the most appropriate way of determining terms and conditions, thus removing the need for separate negotiating bodies and the costs and administration associated with them.

However there was also some support for the following arrangements:

- All local authorities employing manual and craft staff form a single negotiating body to offer analogous terms to those determined by the PSC, but with the flexibility to negotiate local agreements where necessary.
- All manual and craft staff employed by Local Authorities to form a single collective negotiating body to determine their terms and conditions.
- Individual local authorities to negotiate terms and conditions independently, therefore making local authority members accountable to rate payers.

It was highlighted by one respondent that the current method of negotiating with Unite representatives for manual workers followed by the involvement of another 'union' Whitley Council as the negotiating body is time consuming and wasteful. With civil servants, negotiations are carried out with one union (Prospect) who are represented at the relevant JNC. With manual workers there is too much duplication of effort in agreeing/negotiating with Unite, then further negotiations/agreements required with Whitley - there is no logical reason why negotiations cannot be concluded with Unite representatives on a JNC, thereby negating the need for the continuation of a Whitley Council.

There were 374 responses from staff under Whitley Council Terms and Conditions who were against new arrangements for determining the terms and conditions for manual and craft workers employed by Local Authorities. Many of these responses stated:

- To leave as is - Whitley Council Memorandum of Agreement.
- The division of a group shows the proposal is no good.

Unite the Union (Regional Officer) stated this is clear evidence that the concept has already failed because groups covered by Whitley in Local Authorities cannot be included. The Employees' Side of Whitley Council stated the Whitley Council was perfectly good as is for local authorities.

3.4 Question 4:

Which particular terms and conditions do you believe should be changed for new starters?

The view of many Departments, Boards and Offices is that changes should be made for new starters in a number of areas.

In particular, the introduction of a flexible working week enabling any five days out of seven to be worked as required by the employer was suggested as a way forward, reducing the need to pay premium rates for weekend working.

In addition to changes to the working week, the following changes were also considered by many to be appropriate for new starters:

- Significantly reduced sick pay entitlement. Sick pay should be reduced to three months full pay, three months half pay.
- Reduced annual leave entitlement.
- Only statutory annual leave should accrue (as per Employment Legislation) when staff are off on long term sick.
- Elimination of premium pay for weekend or evening work.
- Flexible rostering without payment of a premium.
- Confirmation that capability to be progressed irrespective of sick leave. Staff should be subject to capability dismissal at any time - not until all sick pay entitlements have expired, which could be after 12 months - as is the current practice for Whitley staff.
- Provision of simplified dismissal procedures, particularly for Civil Service roles.
- Weekday overtime should be paid at flat rate or time off in lieu.
- Weekend overtime/call-out overtime should either be at flat rate or a maximum of time and a half.
- New staff in all areas to be on a revised all encompassing grading system - irrespective of whether current staff are moved over to a revised grading system.
- Removal of final salary pension schemes.
- Realistic notice periods and compensation for termination of employment in line with private sector.

Other areas suggested for review were as follows:

- 'plussages'
- substitution pay
- acting up
- variations over sickness and disciplinary/grievance procedures
- a new structure for standardised grievance/disciplinary procedures
- performance related pay or piece rate opportunities
- overtime and conditioned overtime – variations amongst employment groups
- annual leave allowances
- recruitment and retention allowances if found to be no longer appropriate
- payment of allowances when on annual or sick leave
- accrued time for manual workers
- flexible working
- the concept of set break times

Disagreements over some of the above areas were considered to be demoralising and time wasting for all concerned. It was suggested that Government should be seeking to pay people for what they do and when they do it, rather than risk having to pay an increased rate throughout someone's career, because on a very occasional basis they may do something higher than their normal grade or working hours.

A comment that flexibility needs to be built into all role descriptions to avoid concern over requests to do work that appear outside of what is written down was made although the commentator thought this should be a matter for Departments to address.

A greater use of annualised contracts was considered appropriate in aligning pay to private sector practices and could achieve many of the financial savings which would typically be achieved by outsourcing.

Several respondents considered the matter of terms and conditions for new starters to be a matter for the PSC to bring forward for negotiation.

The opinion that there should be no changes to terms and conditions for new starters was unanimous amongst the manual and craft worker responses. Many cited that any attempt to change conditions for new starters would be discriminatory and unfair and may lead to discontent and resentment amongst groups of staff undertaking the same role, yet being paid a different rate for doing so.

The Isle of Man Chamber of Commerce's view is that for new starters, the Isle of Man Public Sector needs to consider its current pay and conditions against those that prevail in the Isle of Man Private Sector, as the Manx labour market is a competitive one. Opportunities to review key areas of: hours; leave entitlement; pay rates (standard and enhanced); and pension contributions should be taken and applied to new starters. The Isle of Man Chamber of Commerce stated that it has been campaigning for 4 years to close the current pension scheme to new members, and indicated that it would expect this matter to be dealt with at the outset of the life of a new Public Sector employment body.

Prospect stated that it did not 'believe' any particular terms and conditions should be changed for new starters, but as is consistent with its ongoing approach, remained open to dialogue and negotiation on the issues. Unite the Union (Regional Officer) stated that to disadvantage prospective employees is creating a vessel for future unrest and invokes a race to the bottom culture that will have repercussions on the local economy.

3.5 Any other comments or observations you may have regarding this proposal to establish a Public Services Commission?

A suggestion was made that phasing in the new terms and conditions over a period of time say 3 years should also be a consideration for existing employees with new terms and conditions being mandatory for all new recruits from a set date.

One respondent was of the view that this is an opportunity to make the current system much simpler and fairer as well as providing a chance to give better value for money to the general public. They went on to elaborate that in recent years the Civil Service Commission has created a standardisation of terms and conditions for Civil Service jobs but the Whitley Council's negotiating format has caused major imbalance across other public service staff dating back many years. In the respondent's opinion 'local agreements', including different agreements within the same Department, have created a real inequality amongst Whitley Council staff. Finally a suggestion was made that all wages, for both Civil Servants and Whitley Council staff, should be reviewed.

It was suggested that the different terms and conditions between the two main employment groups is divisive and damaging to the Public Service. The opinion being that harmonising terms and conditions at this difficult time would improve morale and team building within the Public Service. In the respondent's Department they stated that there is too much of an 'us and them' attitude.

The feeling of many of the respondents is that as public servants they should all be treated fairly and equally.

Several respondents stated that the establishment of a PSC will reduce the number of negotiating bodies for pay and terms and conditions, improve the ability to move staff, remove anomalies between pay groups doing similar tasks and remove 'Spanish' customs.

It was also suggested that the focus of the PSC should be on establishing flexible working arrangements that reflect the differing needs of the various Departments. However, the establishment of this body should not be used as an opportunity to save money by eroding the terms and conditions of existing employees.

It was the view of one respondent, that the role of the PSC, as the unitary employer, should encompass responsibility to ensure that an effective human resource strategy is developed for the Isle of Man Public Sector which minimises dependency on off-island skill pools.

Another respondent commented that the establishment of a PSC should not be a means to making workers, especially at the lower end of the scale make sacrifices while others higher up the food chain keep their privileges. Any system must allow protections for employees and the means of effective and reasoned representation by their respective unions or associations. Failure to deal with this properly could lead to a great deal of industrial unrest after years of relatively peaceful labour relations in the Island. Such industrial unrest could prove more costly both financially and socially should it not be dealt with properly. The workers at the lower end of the pay scale need to know that they have access to a fair and competent negotiating body.

The view of one civil servant is that as a long-term objective, a PSC should be able to simplify negotiations processes and to develop more consistent terms and conditions and this should provide the opportunity for simpler employee representation arrangements. They went on to comment that all this is precluded by the need to have constructive relationships between staff and employees; policies that are consistently and fairly applied; management and leadership

training; decisions on what services Government actually provides (by following through the Scope of Government Review) and crucially, determining the number of staff actually required. The belief of this individual is that the PSC is merely the mechanism for applying what falls out from this and is the answer to nothing, in itself.

The Isle of Man Chamber of Commerce stated that it supported the creation of a Public Services Commission and that the cost and cumbersome nature of our Public Sector cannot be allowed to impact the competitive advantage of the Island and the ability of our businesses to drive economic growth. The Chamber said it was concerned about the disproportionately high costs of providing the Public Sector on the Island and supported any government action that enabled the retention of a competitive edge in such difficult economic times.

The Department of Community, Culture and Leisure stated that it supported the introduction of a single employing body for those employees not linked to off-Island pay arrangements, and that as an employer of a number of different employment groups, moves towards harmonisation of core entitlements for the Department's employees could assist in the overall management of the Department. The creation of a platform for the establishment and implementation of fair and equitable staff policies which could be implemented across not only the Department's different business areas and employment groups, but wherever possible across other Departments, Boards and Offices, would be clearly beneficial. Matters such as sick pay, grievances, discipline and other core employment matters should be consistent across the Government. The Department of Community, Culture and Leisure also stated that the opportunity should be taken to ensure that whatever policies are adopted by the new Commission are as fair to the employer and taxpayer as they are to the employee.

Unite the Union (Regional Officer) stated that the sole purpose of establishing a PSC was to dismantle Whitley Council based on misconceived ideas within the Council of Ministers and Tynwald and managers who cannot be bothered following the Memorandum of Agreement guidance; and that it was expensive overkill. The Employees Side of the Whitley Council stated that a PSC would be undemocratic and as Whitley has joint signatory rights and employee side input, Whitley works.

Whilst not specifically asked for in the consultation, there were several views given regarding Local Authorities in the Isle of Man and these are detailed below:

- There was a feeling that there should be fewer Local Authorities in the Isle of Man particularly as the overheads of retaining Commissioners in all the parishes is unsustainable and makes no sense.
- Local Authorities should give up their responsibilities and such staff and responsibilities should be amalgamated to shared services. Local Authorities should only be elected members and administrative staff who manage/liaise on behalf of clients/users and elected members' decisions.
- There are too many property/maintenance/land management teams for a small island, working against each other or not uniting resources, validating management roles. This is not cost effective or efficient use of resources.

4. Conclusions

4.1 Summary of Responses

There was considerable support for the establishment of a PSC, despite the number of negative responses received from staff employed under Whitley Council Terms and Conditions. Many respondents, including individual civil servants, Local Authorities, Departments and union bodies identified benefits to be gained by the establishment of a PSC although caution was expressed in terms of how any such proposal is progressed.

A simplified mechanism for the negotiation of terms and conditions was considered advantageous with appropriate union and management representation. The majority view of those commenting on future arrangements for Local Authority employees, following the creation of a PSC, was that the terms and conditions agreed through the PSC collective bargaining machinery should be applied by analogy.

The harmonisation of policies and procedures was welcomed and the majority of respondents (excluding those from staff under Whitley Council terms and conditions) saw merit in considering revised terms and conditions for new starters.

4.2 Civil Service Commission Conclusions and Recommendations

The Civil Service Commission has concluded that despite the opposition of some staff employed under Whitley Council Terms and Conditions and by their representatives, the proposal to establish a PSC is broadly supported and should be progressed further. Having regard to the responses received, it has recommended to the Council of Ministers that:-

- a) A Bill should be drafted to enable the establishment of a PSC and that, following consultation, the Bill should be introduced into the Branches during the 2013/14 Parliamentary Year;
- b) The Bill should provide for the Council of Ministers to prescribe, by Order, which groups or classes of employee or office holder would be employees of the PSC. In the first instance this should be limited to civil servants and those members of staff employed by Departments and Boards under Whitley Council Terms and Conditions of employment. Once the PSC is established, more detailed consideration should be given, following consultation, to extending its remit to other employees;
- c) The Bill should provide for the PSC to establish joint negotiating and consultative machinery for its employees. Whilst the PSC should seek to quickly establish a single negotiating body for all employees, particularly in respect of pay negotiations, it is acknowledged that the retention of sub-groups for Civil Service and Whitley Council staff may be necessary on at least an interim basis, whilst harmonisation discussions proceed;
- d) The Bill should provide for the PSC to determine terms and conditions of employment, through collective bargaining and consultation, as appropriate. As part of these processes, the establishment of new terms and conditions for new entrants should be progressed with a view to creating harmonised terms and conditions for all new appointments at the earliest opportunity;
- e) The Bill should provide for the PSC to delegate authority for the performance of its functions to Departments, Boards and Offices, to enable them to manage their staff

directly, with local arrangements being put in place to meet operational needs, where appropriate.

- f) Local Authority employees should not become employees of the PSC, as it would be restricted to central government employees. However, the terms and conditions of employment for central government manual and craft workers, determined by a PSC, should be adopted for Local Authority workers on a 'by analogy' basis. It will therefore be a matter for Local Authorities, individually or collectively, to determine the most appropriate arrangements. This is consistent with the arrangements which exist already for professional, managerial and administrative staff within Local Authorities.

4.3 Council of Ministers' Conclusions

The Council of Ministers has agreed the recommendations of the Civil Service Commission and has requested the Commission and the Office of Human Resources to progress the matter in conjunction with all relevant parties. The implementation timetable agreed by the Council of Ministers is as follows:

Date(s)	Tasks
Sept – Dec 2013	Legislative Drafting
Jan – Feb 2014	Consultation on Draft Bill
Mar – July 2014	Progression of Bill in Keys/Legislative Council
July 2014 – April 2015	Royal Assent Appointed Day Orders Appointment of Commission Establishment of Collective Bargaining Machinery Revocation of existing Collective Bargaining Machinery Establishment of Schemes of Delegation Transfer of Employees to PSC

	List of Respondents
1	Department of Education and Children
2	Department of Environment, Food and Agriculture
3	Public Sector Pensions Authority
4	Department of Community, Culture and Leisure
5	Department of Infrastructure
6	Department of Social Care
7	Manx National Heritage
8	Lonan Parish Commissioners
9	Onchan District Commissioners
10	Patrick Parish Commissioners
11	Maughold Parish Commissioners
12	Malew Parish Commissioners
13	Douglas Borough Council
14	Peel Town Commissioners
15	Association of Teachers and Lecturers (ATL)
16	Prospect/GOA
17	Unite the Union (Regional Officer)
18	Employees' Side Whitley Council (Chairman)
19	Isle of Man Chamber of Commerce
	466 responses from individuals