

A shared service provided by Bracknell Forest Council, West Berkshire District Council and Wokingham Borough Council.

BUSINESS PLAN

An outline of the arrangements designed to guide service delivery.

2017

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1. BACKGROUND AND INTRODUCTION

Since 2010 Wokingham and West Berkshire Councils have been working together in delivering joint services and they have been considered to be successful, both in terms of financial savings and protecting valuable frontline public protection services (Trading Standards, Environmental Health and Licensing). This arrangement expired in January 2017.

Following discussions between Bracknell Forest, West Berkshire and Wokingham Councils there was general agreement between officers and members that a new joint service could be formed which assimilated best practise from a range of other successful joint services and help deliver further efficiencies and provide professional resilience.

During 2016 a business case) was developed to evaluate the need for an expanded joint Public Protection Service ('the Service'). A Project Board was set up consisting of senior officers from Bracknell Forest, West Berkshire and Wokingham Councils ('the Partners') and a series of meetings led to the production of this business plan which is designed to give direction to the new service.

The legal mechanism which binds the Partners is referred to as the 'Inter Authority Agreement' (the Agreement) and this business plan expands on the details required to ensure a healthy working relationship – it is the primary schedule attached to the Agreement and any changes to it requires approval from all the Partners.

The complex nature of the various statutory responsibilities this new service will be required to undertake does require a great deal of explanation. Given the challenges facing local government resources, it is vital that the Partners understand how the new service will meet these requirements and appreciate how the various priorities are balanced against the resources that are available. These priorities will be established through the evaluation of evidence, information and professional judgement. This business plan will communicate how decisions will be made, why they are made and how the risks attached to those decisions will be managed.

The governance arrangements of the new service, which will be discussed in more detail later on in this document, aim to provide fairness, equity and transparency to the Partners through a Joint Committee and to the public these organisations serve. There should be no loss of local input and community needs will be a vital part of any decision making.

2. VISION

To protect and support residents and legitimate business through the successful use of information and intelligence, delivering safe and healthy neighbourhoods.

3. MISSION

The purpose of the service is to: -

- Provide people information to enable them to make informed decisions and understand their rights and responsibilities.
- Create an atmosphere where legitimate and compliant businesses can thrive and not have their interests undermined by those who choose not to comply.

- Preserve the health, wellbeing and safety of the communities we serve.

4. VALUES

Our values have a major influence on the way we want to be seen:

- Objectivity in decision making.
- The desire to meet the needs of the community.
- An approach to service delivery which is professional on every level.

5. AIMS

Schedule 5 of the IAA outlines the strategic aims:

- The sharing of expertise and best practice.
- The creation of greater resilience and robustness to cope with unforeseen challenges such as disease outbreaks, large scale investigations or loss of key personnel.
- Sharing and developing resources to drive efficiency and effectiveness including systems and areas of specialist knowledge such as legal, finance and investigative skills.
- Eliminating duplication by needing to do things only once across all locations and elements of the service for example procedures and standard documentation.
- Building on the success and innovation of the partners to agreement and learning from each other and implementing that learning.
- The effective use of communication to protect communities and enhance the reputation of the Partnership and the Councils.
- Reduce costs by operating jointly.
- Making effective use of partnership funding, service specific grants and monies received from the Proceeds of Crime Incentivisation Scheme.
- Development of the Service in ways which drive further efficiencies and service improvements.
- Playing our role and enhancing our reputation on a regional and national level.

6. SCOPE OF THE SERVICE

Each area of work carried out by the Service originates from a legal requirement placed on local authorities. It is stated in the Constitution of each local authority Partner how these functions can be

delegated, and the Agreement sets out the mechanism by which this delegation of powers has been achieved.

6.1 Relevant Functions

Below is a list which provides a general guide to the regulatory and public protection functions which will be delivered by the Service (definitive list is at Schedule 2 of the Agreement):

- Air quality management
- Animal warden
- Animal welfare
- Contaminated land
- Communicable diseases
- Community education
- Community mediation
- Consumer advice
- Environmental nuisance protection
- Fair trading
- Financial investigations
- Fraud and counterfeiting
- Food and Feed safety, standards and hygiene
- Gambling
- Health and safety at work
- Health promotion
- Industrial pollution
- Licensing
- Metrology
- Overloaded vehicles
- Pest control
- Petroleum and explosives
- Primary Authority
- Private sector housing
- Product safety
- Public health
- Rogue trading
- Scams
- Taxi licensing
- Underage sales
- Water supplies

7. GOVERNANCE

A defining feature of the Service will be the open and transparent way for each of the Partners to come together and make decisions, understand the complexities of the functions being delivered and appreciate the rationale for service priorities. There will be 3 distinct layers of governance (see below), allowing for a good balance between flexibility and oversight, encouraging discussions between officers and members and keeping a firm set of priorities at the heart of everything the Service does.

7.1 Joint Committee ('The Committee')

This is the top tier of governance consisting of each Partners Executive Member covering the full range of Environmental Health, Licensing and Trading Standards. In addition each Partner nominates a second Member and a substitute Member

The purpose of the Committee is primarily to determine on matters of policy and strategic direction for the partnership, including considering and determining applications to be part of the Partnership or the services provided by it. Additionally the Committee will have financial oversight to ensure that budgets are being well managed, to understand any risks that may arise during the term of the agreement, keep under review the agreed percentages and proposing a fee structure for the three Councils.

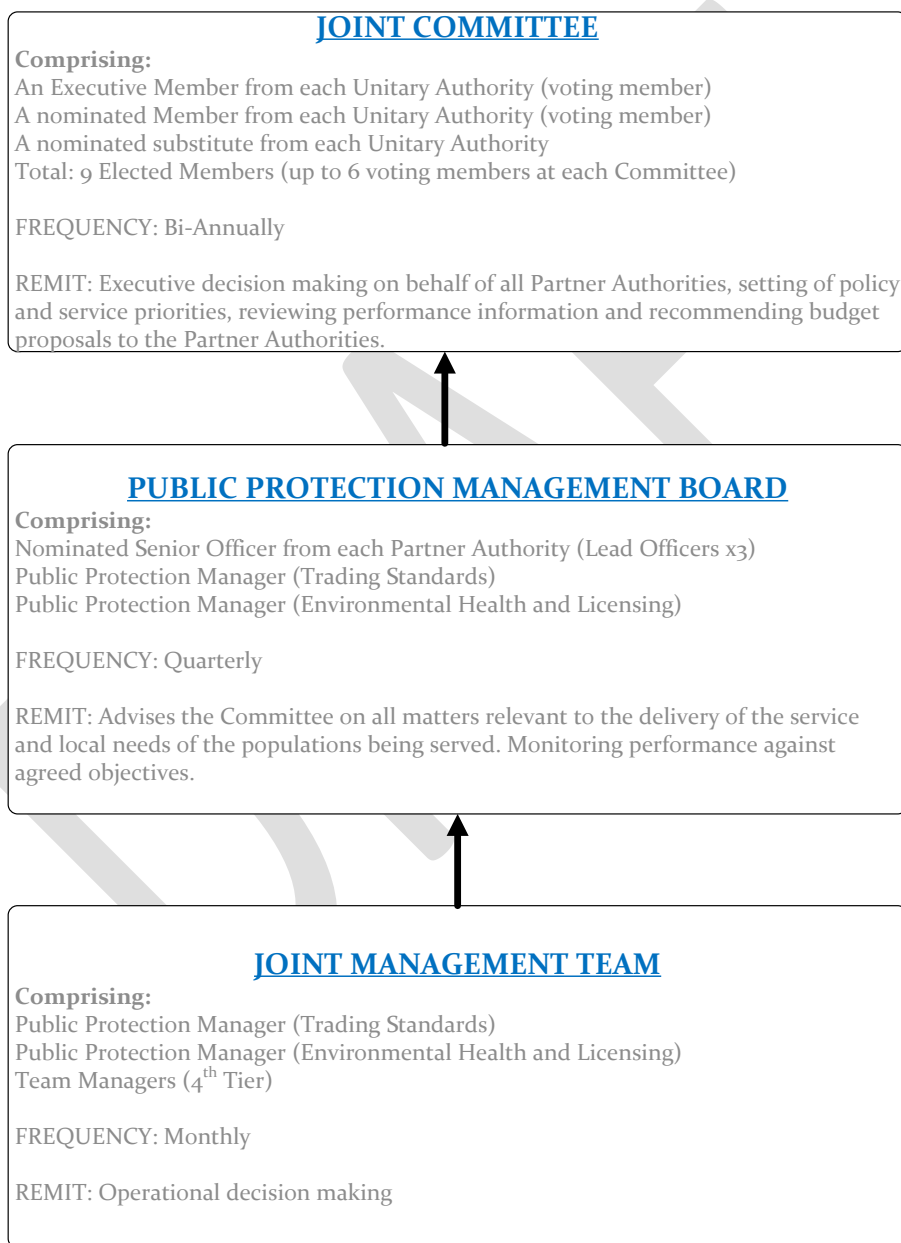
7.2 Joint Management Board ('The JMB')

The JMB advises the Committee and consists of nominated Lead Officers (LO) from each of the Partners.

Each Partner must have a LO on the Management Board, which assesses a variety of criteria to ensure the good health of the Service, monitors its performance against agreed objectives and chooses the items considered most relevant to update the Committee every 6 months.

7.3 Joint Management Team ('The JMT')

This team will consist of the Public Protection Managers (Third Tier) and Operational Team Managers (Fourth Tier). This team will consider the application of the operating model (see section 8.3) and ensure that the appropriate level of information and intelligence is provided to the JMB.



7.4 Licensing Committee

Each Partner will continue to have a distinct Committee for the purposes of licensing decisions and the setting of the following policies:

- Licensing Policy – for the purposes of the Licensing Act 2003.

- Gambling Policy – for the purposes of the Gambling Act 2005.
- All Taxi and Private Hire Matters.
- All other policy matters which are delegated to each of the Partners' Licensing Committees as part of their Constitution.

Constitutional and procedural advice to the Licensing Committee will remain the responsibility of each Partner's legal and associated democratic services. This is to maintain the in-house knowledge and consistency that members expect and that is appropriate for local accountability. This is also the case for any associated meetings in the delivery of the Licensing Committee.

For Sub-Committees, local members will have full control of their delegated functions. The Service will ensure that each and every case referred to the appropriate Sub-Committee is properly made and in accordance with the requirements of the relevant legislation.

Appeals and challenges to Licensing Committee decisions will be managed and defended by each Partner in line with their own policies. Any technical licensing advice required in the process will be provided by the Service. This is to ensure that Members who make decisions are held to account by their own legal and financial services and it does not become a matter for the Board. For example, an appeal to the Magistrates against a decision by a Partners licensing sub-Committee will be represented by the Partners own legal team and any costs incurred will be met by the Partner outside of the Service's legal agreement.

8. APPROACH TO GENERAL POLICY AND DECISION MAKING

In line with the legal agreement and the appropriate delegations, the Service will develop its own distinct set of general policies. In the early stages of the agreement, the Service will aim to adhere to the Partners existing policy, which may be different across the different administrative boundaries but over time it will be a primary aim to reduce these local variations.

The Committee will set any policy for the Service, ensuring each Partner can contribute to the way the Service interacts with the community.

8.1 Public Protection Operating Model - Application of the National Intelligence Model¹

The Service will be managed by the JMT using an approach which firmly links the development of local knowledge, professional risk management and the gathering of information to generate intelligence. This operating model is considered very effective in explaining why, on a daily basis, officers follow a particular course of action. This is vital in the current financial climate and ensures that Members are well briefed on the service priorities, staff receive better tasking and direction and that public protection matters are more clearly defined.

There are specific products that are generated as a result of this operating model:

- **Strategic Assessment** – The Committee will be briefed annually (or more frequently if appropriate) on the status of the assessment which provides Members the best

¹ Referencing the Practice Advice produced on behalf of the Chief Police Officers by the National Centre for Policing Excellence (2007)

overview of current, emerging and long-term issues and leads to setting service priorities.

- **Tactical Assessment** – The JMT will focus on the more immediate issues being dealt with and review their priorities and resource allocation on a monthly basis.
- **Problem profile** – Under the guidance and direction of the assessments, Team Managers (4th Tier) will set up projects to deal with a specific type of problem (i.e. under-age sales or noise nuisance) and which may be defined to a particular geographical area. This may be prevention, intelligence gathering or enforcement.
- **Subject profile** - Under the guidance and direction of the assessments, Team Managers (4th Tier) will set up projects to deal with specific individual or groups of people. This may be prevention, intelligence gathering or enforcement.
- **Tasking** – This is the process where Team Managers (4th Tier) will agree how to use resources to deliver the projects. This will always relate to the priorities and the availability of resources at the specific point in time.

The Service will take some time to evaluate the information it has available to settle on some common strategic priorities. Within the first year of operation, the service will produce a strategic assessment for the Committee to decide the priorities. The service will be guided by the JMB on Partner service levels until the first assessment is produced; this will maintain a 'business as usual' experience for residents and businesses.

8.2 Content and Approval of the Strategic Assessment

The production of a Strategic Assessment is the responsibility of the JMT and submitted to the JMB for first review. Once the JMB is satisfied that the product is ready for publication and submission to the Committee it is raised as an agenda item for it to consider at a meeting to be held in the first month of the financial year e.g. April.

The Strategic Assessment should include²:

- Executive Summary
- Introduction
- Performance Review
- Complaints and Intelligence Summary
- Current Control Priorities Analysis
- Emerging Issues
- Organisation Issues
- Cross Cutting Issues
- Future Control Priorities Recommendations
- Intelligence, Prevention and Enforcement Recommendations

8.3 Public Protection Control Strategy

This strategy is owned by the Committee and is a publically available document. It is the culmination of the various intelligence based assessments and published annually to communicate the service priorities. To view examples of how other authorities use these [click here](#).

² National Trading Standards Board – TS Intelligence Operating Model Reference Material Appendix 6

8.4 Evaluation of Information and Intelligence to Inform the Strategic Assessment

'Information' is data of any description and in the context of the Service might be:

- Details of businesses operating in the area.
- Residents' details.
- Previous interactions with businesses.
- Open access data from the internet.
- Data passed to the service from partner agencies.

'Intelligence' is the gathering of information and processing it, this could include:

- Evaluation of information to identify links between people and places.
- Analysis of enquiries (includes service requests and complaints) made by residents to target hotspots of criminal behaviour.
- Review of complaints about businesses to generate a list of inspections and audits.
- Conduct a 3 year historical survey of all noise investigations to identify communities at risk from noise.
- Produce risk profiles for individuals who may be targeted by criminals e.g. rogue trading.
- Organising data collected into ward level profiles to engage with local members, town and parish councils etc.

8.5 Risk Profiles

In addition to the production of the assessments and the control strategy, the JMT will ensure that each function (see 6.1) of the Service, and any other relevant issues such as management capacity or availability of technical expertise will be evaluated for the following risks:

- Public Safety
- Public Health
- Finance (internal/public)
- Reputation
- Political

The evaluation will be a professional judgement based on accumulated knowledge, current data and predicted trends from a wide variety of sources (including the Partners Lead Officer, Members, Residents and Businesses). The JMT will employ a matrix system to monitor service controls and regularly review control measures. Where 'red' risks are identified i.e. where one is considered significant and requires management intervention, an action plan will be issued to guide the Service back towards a more tolerable level of risk. This usually identifies a change in resource allocation, work pattern/methodology or an injection of new resource based on successful bidding.

Scores are ranked 1-4 in both impact and likelihood, with gross and net ratings stated (before and after controls are implemented). Each functional team is then monitored for progress and trends, based on the demands on the service and any change in local situation.

| | | | |
|---------------------------------|-----------------------------------|----------------------------------|--|
| Extreme Impact - Rarely 4 | Extreme Impact - Moderate 8 | Extreme Impact – Likely 12 | Extreme Impact - Almost certain 16 |
| High Impact - Rarely 3 | High Impact - Moderate 6 | High Impact - Likely 9 | High Impact - Almost certain 12 |
| Medium Impact - Rarely 2 | Medium Impact - Moderate 4 | Medium Impact – Likely 6 | Medium Impact - Almost certain 8 |
| Low Impact - Rarely 1 | Low Impact - Moderate 2 | Low Impact - Likely 3 | Low Impact - Almost certain 4 |

The JMT will update the JMB on the risk profiles of the Service at each of their meetings.

9. STRATEGIC PRIORITIES

In advance of the first Public Protection Partnership Control Strategy (to be published April 2018), officers have produced an initial list of priorities to maintain a ‘business as usual’ approach for residents, businesses and Members.

9.1.1 Year 1 Priorities (in no particular order)

Schedule 5 of the IAA outlines the initial priorities under the following headings:

- Community Protection
- Protecting and Improving Health
- Protection of the Environment
- Supporting Prosperity and Economic Growth
- Effective and Improving Service Delivery

9.1.2 Conclusions

These strategic priorities for year 1 do not change the overall nature of the Service or the relevant functions it is expected to deliver – see section 6.1. There will always be a level of risk to the Partners when resources do not allow for all statutory services to be delivered at any one time. However, it is the intention that the operating model together with the publication of a control strategy, should maximise transparency of why certain areas of work have been prioritised; thus helping to ensure that any work carried out has the most beneficial outcome for the community.

10. Effective Internal Systems

In addition to the Service delivering a quality operating model for its relevant functions, there are a number of areas where development should take place to ensure that staff are well managed, the Service runs smoothly and has a healthy, positive relationship with each of the Partners. Over the term of the agreement the JMT will develop the following themes:

- Ensure service management is consistent and good quality across all functions.
- Deliver quality financial information to managers and members.

- Develop online services to improve engagement with residents and business.
- Use clear professional decision making to target enforcement action against those who demonstrate a disregard for the law and the consequences of their actions.
- Regularly review operating procedures to reduce duplication.
- Protect the selection of services available to residents and businesses by charging for them.
- Develop a service specific ICT Strategy which focuses on reducing duplication, integration and cost reduction.

10.1.1 Case Management

The Service will manage the case management process to ensure that investigations and legal proceedings 'relevant functions' identified within the agreement comply with law and good practice. In general terms this would be:

- Evidence collection and preparation.
- Witness management.
- Disclosure.
- Case review.
- Production of case files
- Conduct and management of Proceeds of Crime investigation and proceedings

11. Enforcement

11.1 Enforcement Policy

In line with the Agreement the Service will operate in accordance with the enforcement Policy as follows:

- The Regulators Code will form the basis for the general approach to the delivery of the service.
- The Code for Crown Prosecutors (as amended from time to time) will be the policy basis for decisions on institution or otherwise of legal proceedings.

11.2 Age Restricted Products - Enforcement Approach

There is a legal requirement for the Councils to consider their approach to the enforcement of the age restriction requirements relating tobacco, tobacco products and aerosol spray paints. The Policy set out at **Appendix A** will apply to all age restricted product enforcement.

12. PERFORMANCE MONITORING

The Committee will set any performance targets for the Service to meet. It is intended that the performance monitoring will be presented in the following way:

- Monthly report to the JMB which includes:
 - Team news; this outlines personnel matters, complicated or high profile cases, specific political or media issues.

- Agreed measures of volume; this is a collection of relevant total numbers to demonstrate scale and demands placed upon the service.
 - Risk profiles.
 - Structure charts – to identify the teams and how they are resourced.
- Quarterly performance data which reflects the service priorities. These are currently in Schedule 5 of IAA under the Service Specification.
 - Annual report to the Committee, which includes year on year comparison data to identify trends throughout the term of the agreement between the Partners.

13. WORKFORCE PLANNING

The service will report annually to the Committee summarising the following issues:

- Recruitment and retention.
- Quality and quantity of applicants.
- Unfilled vacancies.
- Results of employee attitude surveys.
- Turnover rate.
- Feedback from exit interviews.
- Organisational development.
- Flexible working.
- Structure.
- Skills development.
- Learning and development.
- Skills resilience.
- Leadership and management development.
- Pay and reward.
- Regional benchmarking.
- Agency, Casual and Contractor use.
- Overtime.
- Use of the job evaluation process.

14. PROFESSIONAL WORKING GROUPS

The Service will support officers to participate across the wide range of professional working groups required to provide an effective service. The terms of reference and evaluation of benefits received from such participation will be assessed by the JMT, these include (but not exclusively):

- Safety Advisory Groups
- Regional specialist groups – e.g. Berkshire EH Managers, LGA Focus Groups
- Trading Standards South East Ltd
- National Groups – e.g. NTSB / NEHB, FSA Focus Groups
- Thames Valley Police Licensing Liaison
- Thames Valley Police LPA Tasking
- Corporate ICT focus groups
- Data Security
- Emergency Planning and Business Continuity
- Corporate Health and Safety
- Equalities and Diversity

Where there are concerns over the resources required to meet expectations from professional working groups this will be escalated through the governance model.

15. SERVICE LEVEL AGREEMENTS - INTERNAL SUPPORT SERVICES

15.1 Legal

Each Partner will provide legal support to the Service as instructed by the Service. In general terms this would be:

- Constitutional advice, including attendance at any relevant Committees e.g. Licensing
- Criminal and civil litigation
- Defend claims, liabilities and costs applications which may arise during the delivery of the service.
- Assist with legal interpretation matters arising from elected members.
- Attend working groups to determine enforcement policy and procedures.
- Liaise on matters relating to data protection, corporate complaint and Freedom of Information requests.

Instructions to the Partnership legal teams will be at the carried out by the Head of Service, Public Protection Managers or Case Manager. We will seek to draw upon the expertise of the various teams and instruct accordingly.

15.2 Finance

The Host manages day to day financial matters, as stated in the agreement, but it is considered necessary for each Partner to retain a degree of support for both the Client Officer and their Members.

15.2.1 Advising Members

In order to ensure that each Partner has the ability to advise its own Members on financial matters that may arise over the term of the agreement the following activities should be considered from time to time:

- Availability to attend Committee meetings.

15.2.2 Advising the Lead Officer

In order to ensure that each Partner has the ability to advise its own Lead Officers (or 'Client') on financial matters that may arise whilst operating the service the following activities should be considered from time to time:

- Facilitate the transfer of money processed by any cash office hosted by a Partner authority.
- Liaise with the relevant service manager on the calculations required to understand inflationary changes to transactions between Partners.
- Information on the service cost centres to inform decision making process at the Committee and the JMB.

15.3 Information, Communication and Technology (ICT)

Each Partner will provide suitable and sufficient ICT services and equipment in line with current agreements and standards. Areas to be included, but not exclusively are:

- Laptop's, PC's and telephones.
- Connections and network support to all hardware utilised at local sites.

- Advice on development opportunities.
- Maintenance of all hardware and software.
- IT Helpdesk facilities.
- Data security advice (this will include a policy review to align practices where possible and agreed through the JMB).

15.4 Property

Each Partner will provide suitable and sufficient accommodation, maintenance and repair for all staff located within the local offices. All existing standards should be maintained and any proposed changes to the accommodation allocated to the Service should be notified to the JMT by the Lead Officer as soon as is reasonably practicable.

This should include:

- Storage for evidence.
- Filing space.
- Equipment cupboards.
- Personal storage lockers for staff equipment and belongings.

15.4.1 Car Parking

Each Partner will provide facilities for staff to park their cars in close proximity to the local offices and any proposed changes to the parking allocated to the Service should be notified to the JMB as soon as is reasonably practicable.

15.4.2 Security Passes

Each Partner will provide facilities for staff to access the local offices and any proposed changes to the passes allocated to the Service should be notified to the JMB as soon as is reasonably practicable. Once in place, the Service will assume responsibility for the management of these issues and liaise with the appropriate Lead Officer.

15.5 Media Liaison

Each Partner will provide the Service with access to resources to process media enquiries relevant to the Service. This will include:

- Logging all media enquiries relevant to their area.
- Liaising with relevant elected members.
- Provision of advice to the service when requested.
- Assistance in promotional campaigns.

The Client Officer will advise the Service of any local procedures and facilitate where appropriate.

The Communications Strategy for the PPP is set out at **Appendix B** to this Business Plan.

15.6 Customer Services

Each Partner will provide the following:

- Local reception facilities for customers of the Service.
- Main switchboard facilities to direct calls to the Service.

- Web support for hosted pages relevant to local services.

15.6.1 Corporate Complaints

The Service deal with any direct Stage 1 complaints (defined as complaints directly relating to the delivery of the service and/or its staff) and then each Partner authority will remain responsible for Stage 2 complaints (defined as the Stage 1 complaint review process) in liaison with the Service. This also includes liaison with the Ombudsman and any MP involvement.

15.6.2 Data Protection

The Service will keep records of any DPA requests and provide them to any Partner authority who requests them.

15.6.3 Freedom of Information

The Service will keep records of any FOI requests and provide them to any Partner authority who requests them. Where multiple FOI requests are made to each Partner authority, a protocol will be agreed.

16. EXTERNAL CONTRACTS

In line with the Agreement, the Committee will consider any new external contracts on behalf of the Service or delegate to an appropriate officer. Existing contracts will be monitored by the JMT as part of normal business activity.

17. FUTURE OPPORTUNITIES

Whilst this business plan outlines the way the initial Partners will operate together, it should be noted that there will be an embedded aspiration to grow the Service to improve economies of scale, reduce duplication and generally look for opportunities to save money.

Given the highly technical and specialist areas of intelligence, investigation and case management and the relative scarcity of this expertise in the public sector, the Service will look to encourage other public bodies to consider using them to deliver these functions.

It is not the intention of the Service to produce extensive marketing to seek out commercial opportunities but, as part of ongoing service delivery, if there are enquiries as to the availability of services it is intended that such enquiries will be followed up.

The Committee will be kept informed of all enquiries that progress to viable business opportunities to grow the Service.

APPENDICES

A. AGE RESTRICTED PRODUCTS – ENFORCEMENT APPROACH

B. COMMUNICATIONS STRATEGY

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