

PPP – CONROL STRATEGY: PRIORITY CODES

CORE

- CP1 Community Protection
- CP2 Protecting and Improving Health
- CP3 Protection of the Environment
- CP4 Supporting Prosperity and Economic growth
- CP5 Effective and Improving Service Delivery

Cross Cutting Issues

- CC1 Vulnerable persons
- CC2 Serious and Organised Crime Groups
- CC3 eCrime
- CC4 Modern Day Slavery

Strategic Assessment

- SA1 Doorstep crime and mass marketing
- SA2 eCrime (including Intellectual Property)
- SA3 Second hand car sales and car repairs
- SA4 Health promotion amongst the young (tobacco and alcohol focused)
- SA5 Product Safety
- SA6 Air Quality
- SA7 Development Control
- SA8 Commercial and Environmental Noise (Statutory Nuisance)
- SA9 Housing conditions, including mobile and static homes
- SA10 Statutory Nuisance impacting on Environmental Living Conditions
- SA11 Health and Safety in the work place
- SA12 Food Safety at businesses premises and in the home

SA PRIORITY: SA1		Doorstep crime	CORE PRIORITY: CP1	CC IMPACT: CC1/CC2/CC4
Prevention	Promotion of successful prosecutions, interventions and the value of those interventions via press releases and social media to increase public awareness			
	Expand reach of partnership working with non-enforcement bodies to improve education to potential victims			
	Ensure those at risk are referred to the appropriate agencies to reduce the likelihood of them becoming victims			
	Improve public awareness regarding Doorstep Crime and consumer rights via open events, social media and website			
	Promote Trader approved schemes to improve consumer choice			
Intelligence	Further develop our relationship with TVP to enhance the training of their officers on consumer issues			
	Improve relationships with our legitimate traders to encourage them to report incidents of suspect rogue trading			
	Improve victim profiling to better target both our intervention and preventative activities.			
	Further develop our relationship with the CTSI NIH and RIO and GAIN network to increase understanding of the OCGs operating in our area			
	Improve reporting gateways for public and trade to increase amount of intelligence flowing into the PPP			
Enforcement	Improve our response protocol with TVP through the development of the Response team			
	Develop use of alternative civil sanctions alongside those already deployed against these traders.			
	Review witness care protocols to ensure appropriate support is provided to victim, ensuring they are confident to support our court actions			
	Enhance participation in national operations (i.e. Rogue Trader week) to increase detection of perpetrators			
	Increase our resources to ensure best evidence is captured in accordance with ABE principles			
SA PRIORITY:		eCrime (including Intellectual Property)	CORE PRIORITY:	CC IMPACT:

SA2			CP1/CP4	CC3
Prevention	Promotion of successful interventions via press releases and social media to increase public awareness.			
	Improve public awareness regarding eCrime via open events, social media and website particularly in relation to copycat websites and online scams			
	Encourage better awareness particularly from smaller traders of the potential dangers regarding eCrime			
	Overt membership of selling forums and active engagement with potential sellers of IP related goods			
	Engage with and inform vulnerable consumers who have been identified as victims of online scams			
Intelligence	Further develop our relationship with TVP by including IP awareness with their officers			
	Improve relationships with our legitimate traders to encourage them to report incidents particularly in relation to IP related offences			
	Improve reporting gateways for public and trade to increase amount of intelligence flowing into the PPP			
	Use of alternative information platforms to gain intelligence regarding the nature and prevalence of eCrime in particular market sectors			
Enforcement	Enhance participation in regional projects (i.e. TSSEL) to increase detection of issues and effectiveness of projects			
	The use of intelligence guided projects to target problem product types and sales environments			
SA PRIORITY:		Second hand car sales and car repairs	CORE PRIORITY: CP4	CC IMPACT:

SA3				CC1
Prevention	Promotion of successful interventions via press releases and social media to increase public awareness			
	Improve public awareness of consumer rights regarding via open events, social media and website			
	Enhance knowledge of the trade in relation to consumer law, particularly with regard to the 'sales practice' type offences			
	Promote Trader approved schemes to improve consumer choice			
Intelligence	Improve reporting gateways for public and trade to increase amount of intelligence flowing into the PPP			
	Improve relationships with our legitimate traders to encourage them to report suspected problem traders			
	Use of alternative information platforms to gain intelligence regarding the nature and prevalence of issues in particular market sectors			
	Analysis of targeted interventions to better understand the effectiveness of those interventions and improve future operations.			
Enforcement	The use of targeted interventions against traders generating a disproportionate number of complaints for the size of operation			
	The use of intelligence guided projects to target specific problem areas of the market sector			
	Enhance participation in regional projects (i.e. TSSEL) to increase detection of issues and effectiveness of projects			
	Consider the use of alternative enforcement regimes (i.e. assurances, post conviction orders) to tackle persistent offenders			
SA PRIORITY:		Health promotion amongst the young	CORE PRIORITY:	CC IMPACT:

SA4		(tobacco and alcohol focused)	CP2	CC1
Prevention		Improve awareness amongst the young regarding the dangers of smoking and alcohol using a range of delivery methods including e-learning, presentations in schools, theatre performances etc.		
		Work with partner organisations to ensure the robustness of the adopted drugs and alcohol control strategy		
		Proactive engagement with traders, partners and young people through Community Alcohol Partnerships		
		Engage with parents and target groups to influence their behaviour around vulnerable groups such as young people		
		Work with our partners in the local Tobacco Control Alliance to reduce levels of tobacco consumption across the area		
		Reduce proxy purchasing and general supply of age restricted to those under the relevant age		
Intelligence		Conduct school attitudinal survey across the PPP area to monitor the impact of adopted strategies		
		Improve reporting gateways for public and trade to increase the amount of intelligence flowing into the PPP regarding the illegal sale of age restricted products to young people		
		Engage with partner organisations (i.e. Police , HMRC, educational establishments) to ensure that all intelligence regarding sales of age restricted products is shared with the PPP		
Enforcement		Engage in a programme of test purchasing to ensure that age restricted products are not easily available		
		Where offences are detected, liaise with partner organisations to ensure the proportionate and necessary action, such as licence reviews, suspensions and/or prosecutions, is deployed in a consistent manner		
		The use of intelligence guided projects to target problem product types and sales environments		
		Enhance participation in regional and national projects		
SA PRIORITY:		Safety	CORE PRIORITY:	CC IMPACT:

SA5			CP1 / CP4	CC1/CC3
Prevention		Promotion of successful interventions via press releases and social media to increase public awareness		
		Improve public awareness regarding product safety via open events, social media and website		
		Encourage better awareness from the traders in our area, particularly from smaller importers, of the potential dangers regarding product safety and goods, particularly from outside the EU		
		Engage with national awareness days to raise consumer awareness particularly in relation to goods imported from outside the EU		
Intelligence		Improve relationships with our legitimate traders / importers to encourage them to report incidents		
		Improve reporting gateways for public and trade to increase amount of intelligence flowing into the PPP		
		Use of alternative information platforms to gain intelligence regarding the nature and prevalence of product safety issues in particular market sectors		
		Investigation of alternative selling platforms to identify small scale traders based in the PPP area		
Enforcement		The use of intelligence guided projects to target problem product types and sales environments		
		Enhance participation in regional projects (i.e. TSSEL) to increase detection of issues and effectiveness of projects		

SA PRIORITY: SA6		Air Quality	CORE PRIORITY: CP2 (CP3)	CC IMPACT: CC1
Prevention	Liaise with the relevant Local Planning Authorities (LPAs) during their current review of Local Development Plans to ensure that Air Quality is high on the agenda and is a main consideration when bringing forward new development.			
	Work with the relevant LPAs on publishing a 'Planning and Air Quality Document' to provide guidance on how developers should assess the potential impact of a development on air quality and provide advice on minimising impacts. The document will also assist planners and developers in assessing the potential 'damage' to air quality in terms of the financial cost and identify appropriate measures to offset the impacts of this damage.			
	Work with the PPP Communications Manager to ensure clear advice and information on Air Quality is available on the PPP web site. Including information on events such as 'Air Quality Week' and advice on what individuals, schools and businesses can do to limit the impact of their activities on air quality, improving air quality and reducing their exposure to air pollution.			
	Promote the air quality monitoring undertaken, publishing the results so residents are better informed about the air quality where they live.			
	Develop a PPP Air Quality Strategy which will set out how we intend to contribute to the protection and improvement of local air quality across the three areas. As part of the Strategy we will facilitate actions to protect air quality/ reduce exposure to air pollution with other stakeholders including Highways, Transport, Public Health and the Public Health and Well Being Board			
	We will continue to make positive progress with the various Air Quality Action Plans established for each AQMA. An annual progress report on the planned activities will be produced and published along with the annual ASRs submitted to Defra for approval			
Intelligence	On-going collection of real time and passive AQ monitoring data across the three authorities to monitor air quality concentrations and measure the impact of air quality mitigation measures and help us to identify potential areas of concern that may require attention in the future			

	Collection and use of data including, for example, results of air quality modelling and assessments carried out by developers		
	We will respond to information from residents and other stakeholders about areas of concern that may require monitoring and assessment		
	Respond to complaints from residents, about emissions from potentially polluting industrial processes		
	Assess and respond to intelligence /complaints about possibly polluting industrial processes provided by the public and various agencies (e.g. EA, RBFRS etc) and by PPP district officers and other Council officers		
Enforcement	Enforcement of industrial processes that are or should be operating under a PPC permit including, for example, prosecution for breach of conditions on a permit, for operating without the benefit of a permit In the extreme this could lead to revocation of permits to stop polluting businesses from operating		
	Carry out investigation and enforcement under the statutory 'smoke nuisance' provisions of the Environmental Protection Act 1990 and under the Clean Air Acts.		
	Perform compliance monitoring and inspections of industrial processes permitted under PPC Regulations. The frequency of inspections will be based on the level of risk posed by each process and their compliance history to maximise the impact of our actions. Ensuring compliance with permit conditions will help prevent incidents that could cause significant localised air pollution		
SA PRIORITY: SA7		Development Control	CORE PRIORITY: CP2,CP3, CP4, CP5
			CC IMPACT: CC1

Prevention	Provide timely responses to planning consultations that focus on the protection of the health, the environment and the general amenity of future residents and of exiting residents and businesses in the vicinity of proposed new development. This could include recommendations relating to noise, air quality, land contamination, odour etc. and where necessary, recommend refusal.
	We will assess condition discharge applications to ensure that the conditions that we have recommended have been applied, complied with and have been effective
	We will liaise on a regular basis with colleagues in each Local Planning Authority and provide assistance, where necessary, at planning committee and appeal hearings to help ensure the best outcomes for residents and local businesses.
	We will develop a number of planning related guidance documents in conjunction with the LPAs relating to noise, air quality and the development of potentially contaminated brown field sites. This will help to ensure a consistent approach to our assessment of planning consultations across the three authorities.
	We will work with the PPP Communications Manager to ensure that informative and clear advice and information on EH planning matters is provided on the PPP web site including, for example, FAQs and advice to developers on key issues such as noise, air quality and the development of brownfield sites
	We will respond to Local Plan consultations from each local authority on proposed future development sites to make sure they are sustainable in terms of the protection of health, well-being and the environment and the general amenity of future residents and businesses in the vicinity.
	We will seek to develop a single standard set of planning recommendations acceptable to each LPA and which can be used to improve the efficiency of our responses.
Intelligence	Where appropriate we will provide assistance and support to planning enforcement teams as and when required and will share any relevant intelligence with them

	Regular liaison with the Development Control Management teams in each authority to share intelligence on sites and emerging issues
	Sharing information with other PPP teams about proposed future development that may have an impact on their activities e.g. house conversions to HMOs, new food businesses, businesses run from residential properties (car repairs etc.)
Enforcement	As a consultee to each LPA our enforcement activity is limited. We will refer matters of concern to the three planning enforcement teams and when appropriate, assist with their investigations

SA PRIORITY: SA8		Commercial and Environmental Noise (Statutory Nuisance)	CORE PRIORITY: CP2, CP3	CC IMPACT: CC1
Prevention		Work with the PPP Communications Manager to provide information and advice on the PPP web site about commercial noise to help empower customers to resolve commercial noise issues without our intervention. Information will be provided to assist commercial businesses minimise their noise impact on the community		
		We will liaise with the local planning authorities to ensure that appropriate conditions are imposed to minimise the impact of noise from or affecting new developments both during the constructions and operational phases (see above)		
		As a Responsible Authority for the public nuisance licensing objective, we will liaise with licence holders and local residents to ensure that noise and disturbance from licenses premises and activities is minimised. We will also, on a 'risk assessed' basis, monitor various major events that happen throughout the year		
		We will work with businesses to secure compliance in the most cost effective manner, including developing noise management plans where appropriate, including approval of Section 61 applications for large construction projects.		
Intelligence		Assessment of information provided by residents / complainants. Intelligence already gathered by other PPP teams		
		Sharing of information / intelligence we gather with other agencies / teams		
		Feedback from business will be analysed to promote best practice and to ensure continuous improvement.		
		Feedback from customers will be analysed to ensure continuous improvement.		
Enforcement		Service of abatement notice under s 80 of Environmental Protection Act 1990. Prosecution for breach of abatement notices. Carry out works in default		
		Call for review of premises licences or participate in reviews called by others if we consider it appropriate and the issues relate to PN		
		Carry out pro-active risk based monitoring of commercial activities e.g. major events and providing feedback to the relevant enforcing authority.		
		Complaints about more technical and complex commercial and environmental noise requiring longer term interventions will be undertaken; applying best practice to ensure a consistent approach across the three authorities.		

SA PRIORITY: SA9		High Rise Property Fire Safety	CORE PRIORITY: CP1, CP5	CC IMPACT: CC1
Prevention	Participation in strategic and operational meetings involving multiple agencies across PPP			
	Support promotion of successful interventions via wider public access groups such as press releases and social media			
	Participate in practical visits to certain types of buildings providing safety advice and reassurance to the residents of those buildings			
	Increase team member experience & existing knowledge to ensure best use of appropriate legislation.			
Intelligence	Further relationships with internal and external partner agency's to enhance the training of their officers and own officers on Residential team (and broader) PPP issues.			
	Improve reporting gateways for public, partner agencies and other operational teams to increase the amount of intelligence flowing into the PPP.			
	Develop information that would inform a programme of inspection prioritising higher risk premises.			
Enforcement	Increase our resources to ensure best evidence is captured in accordance with ABE principles.			
	Use of alternative civil sanctions alongside those already in existence.			
	Adoption and implementation of a memorandum of Understanding across the PPP for enforcement purposes			

SA PRIORITY: SA9		Licensing Activity	CORE PRIORITY: CP2	CC IMPACT: CC1
Prevention		Ensure officers are equipped to share knowledge with businesses, tenants and partners in a continually changing environment		
		Support promotion of successful interventions via wider public access groups such as press releases and social media to ensure awareness and compliance		
		Use opportunities during programmed visits to certain types of buildings to provide safety advice and reassurance to the residents and managers of those properties		
		Improve relationships with our legitimate businesses to encourage them to seek above minimum standards. E.g. consider LL forums webinars, approval schemes etc.		
		Undertake a programme of inspection to provide on-site advice		
Intelligence		Improve the standard of reporting to capture outcome focused data such as hazards and quantifiable frequency of inspection data		
		Participate in the tasking process and information sharing from the all PPP teams		
		Utilise existing data reporting and tasking process to identify incidents of suspected non-conformity.		
		Participation in strategic and operational meetings involving multiple agencies across PPP		
		Utilise a programme of inspection to inform on the profile of relevant person or area		
Enforcement		Introduce a process of ensuring Council obligations are met, e.g. post site rules on the PPP website, maintaining public registers, processing licensing applications.		
		Carrying out a range of sanctions available where non-conformity or non-compliance with appropriate conditions or legislation		
		Enhance participation in local operations to increase detection of perpetrators		
		Review FTT and appeals protocols to ensure appropriate support is provided to all concerned in enforcement matters		

SA PRIORITY: SA10		Animal Warden and Pest Control	CORE PRIORITY: CP3	CC IMPACT: CC1
Prevention	Support promotion of successful interventions via wider public access groups such as press releases and social media to ensure awareness and compliance.			
	Utilise the opportunity of survey to raise awareness in rodent control			
	Present community fairs to raise awareness in dog control matters across PPP			
	Roll out mapping of complaints in rodent activity and dog fouling across PPP			
	Review the provision of animal warden services across PPP			
Intelligence	Participation in strategic and operational meetings involving multiple agencies across PPP.			
	Carry out community surveys to ascertain issues around problematic rodent control			
	Roll out on-line reporting and mapping system across PPP			
	Utilise data capture from UNIFORM and FLARE to identify trends in stray dog incidents			
	Analysis of PPP on-line reporting portals to improve targeting of resources			
Enforcement	Carry out enforcement of relevant legislation using a range of sanctions available to secure positive community and public health based outcomes.			
	Provide a review of the fee and charging regime to ensure consistent cost recovery sanctions within PPP			
	Standardise response to service requests received by PPP			

SA PRIORITY: SA9		Unlicensed regulated activity	CORE PRIORITY: CP2	CC IMPACT: CC1
Prevention	Support promotion of successful interventions via wider public access groups such as press releases and social media to ensure awareness and compliance			
	Ensure officers are equipped to share knowledge with businesses, tenants and partners in an ever changing environment			
	Use opportunities during programmed visits to provide safety advice and reassurance to the residents and managers of those properties			
	Increase officers awareness through training and experience in identifying and reporting safeguarding issues for the authority's represented by PPP			
Intelligence	Participation in strategic and operational meetings involving multiple agencies across PPP			
	Utilise existing data report and tasking process to identify incidents of suspected rogue landlords.			
	Participate in the tasking process to identify and develop problem profiles			
Enforcement	Carrying out implementing a range of sanctions available where non-conformity or non-compliance with appropriate conditions or legislation			
	Enhance participation in local operations to increase detection of non-conforming premises and/or individuals.			
	Review FTT and appeals protocols to ensure appropriate support is provided to all concerned in enforcement matters			
SA PRIORITY:		Public Health matters, including Anti-social	CORE PRIORITY:	CC IMPACT:

SA10		behaviour and well being	CP3	CC1
Prevention		Support promotion of successful interventions via wider public access groups such as press releases and social media and on-line reporting to ensure awareness and compliance		
		Supply owners of land supporting materials and advice for those affected by community dispute involving such areas as Japanese knotweed, high hedge, dangerous buildings etc.		
		Update officers knowledge to allow the provision of signposting mediation services in private disputes		
		Ensure resilience in knowledge and duty of care with regard to safeguarding issues.		
		Update officers knowledge to allow the provision of signposting mediation services in private disputes		
Intelligence		Participation in strategic and operational meetings involving multiple agencies across PPP		
		Invest in providing all relevant officers with an ability to carry out searches within land registry database		
		Monitor wider health needs and JSNA's priorities that impact on Residential Team's role in PPP.		
		Retain the capacity and resource to maintain and manage relevant public registers		
Enforcement		Increased resource to tackle by enforcement high hedges, assisted cremation, hoarding, boarding and empty property complaints		
		Implementation of legislation powers in premises that are affect community cohesion		
		Review appeals and works in default (local land charging) protocols to ensure appropriate support and funds are retained with PPP.		

SA PRIORITY:	Health and Safety in the work place	CORE PRIORITY:	CC IMPACT:
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SA11			CP 1, CP2, CP4	CC1
Prevention	Participation in national programmes for preventative inspections in high risk sectors or activities to support businesses to comply with legislation, ensuring that employees and members of the public are being protected and non-compliant businesses are not gaining an economic advantage			
	Use of alternative interventions to target high risk sectors and/or activities identified through national, regional or local problem analysis			
	Promotion of successful prosecutions, interventions and value of interventions via press releases and social media to increase public awareness			
	Attendance at Safety Advisory Groups and inspection at high risk / high profile events			
	The use of the Primary Authority (PA) scheme to provide direction to other LA regulators and to ensure our PA partners are operating legally			
Intelligence	Developing problem spotting protocols across the PPP to enable all officers to report on matters of concern when performing other activities			
	Using the Incident Contact Centre RIDDOR reporting of accidents to target interventions / enforcement;			
	Develop pathways to ensure Reportable Accidents are reported, e.g. exchanging information with the injured person through their contact with Doctors or Physiotherapists.			
	Analysing service requests from the public, employees and employers to develop a better understanding of potential issues to better target resources			
	Using existing links with Berks and Oxon H&S Liaison Groups, the HSE, the RBFRS and Public Health Teams, and developing links with TVP			
	Scanning social media and media for emerging risks			
	The use of National Statistics and National Inspection Plans to assist in targeting resources			
Enforcement	Taking proportionate action on detection of Matters of Evident Concern or Matters of Potential Concern			

	Ensure there is resource to participate in the National Inspection schemes
	Training of officers in accident investigation, evidence gathering, decision making and production of case file and Court proceedings to optimise success rates
	Training in occupational health and safety topics and legislation so we can determine breaches and ensure competency in line with S18 HSWA

SA PRIORITY: SA12		Food Safety at businesses premises and in the home	CORE PRIORITY: CP1, CP2. CP4	CC IMPACT: CC1, CC4
Prevention		Undertake a planned prevention programme of visits / alternative interventions of the risk rated food premises across our area to ensure food placed on the market is safe, members of the public are being protected and non-compliant businesses are not gaining an economic advantage		
		All new food premises are inspected to ensure compliance in business practices, that food placed on the market is safe and to assist with the development of the business; ensuring non-compliant businesses are not gaining an economic advantage		
		Promotion of the Food Hygiene Rating Scheme to enable the public to make informed choices relating to food hygiene of the business premises they use.		
		Through the use of Infectious Disease questionnaires, leaflets on food poisoning and developing the PPP website ensure that individuals with confirmed food related infectious diseases are given educative preventative information		
		Participate in national prevention campaigns led by FSA and PHE and develop PPP website		
		Engagement with the Primary Authority scheme to provide direction to other LA regulators and to ensure our PA partners are operating legally		
Intelligence		Sampling campaigns and PHE FW&E reports and emerging risks reports by PHE FW&E		

	Continue to horizon scan for emerging risks within the Food Industry; using FSA intelligence (Food Fraud), intelligence reports to FSA, new guidance and legislation and Food Alerts
	Infectious Disease notifications from PHE and emerging risks detected by PHE
	Using existing links with Berks and Oxon Food Liaison Groups, the National Food Focus Group, the FSA, PHE and PHE FW&E and develop links with other organisations to ensure intelligence is fed back into the PPP
	scanning social media and media for emerging risks and from following leads gained during preventative intervention work
	Analysing service requests from the public, employees and employers to develop a better understanding of potential issues to better target resources
Enforcement	Participation in the National and Local sampling programme to identify unsafe food and ensure it is removed from the market and to contribute to national statistics and local intelligence and ensure non-compliant businesses are not gaining economic advantage
	Use the Infectious Disease notifications from PHE to follow up implicated food premises to ensure unsafe food is not placed on the market and take the appropriate action with regard to the cause of the incident
	Ensure that there are appropriate resources to carry out planned prevention work and sampling and the appropriate intervention can be taken where necessary to ensure non-compliant businesses are not gaining economic advantage
	Development of officers in investigation, evidence gathering, decision making and production of case files and Court proceedings to optimise success rates
	Undertake enhanced interventions with the poorest performing food premises (the Zero and One FHRS score premises)
	Ensuring competency of Authorised Officer in line with FSA COP requirements to ensure any enforcement action taken is legal and uncontested and that the action taken by Authorised Officers is correct and does not cause unlawful economic implications to the businesses or put the public at risk