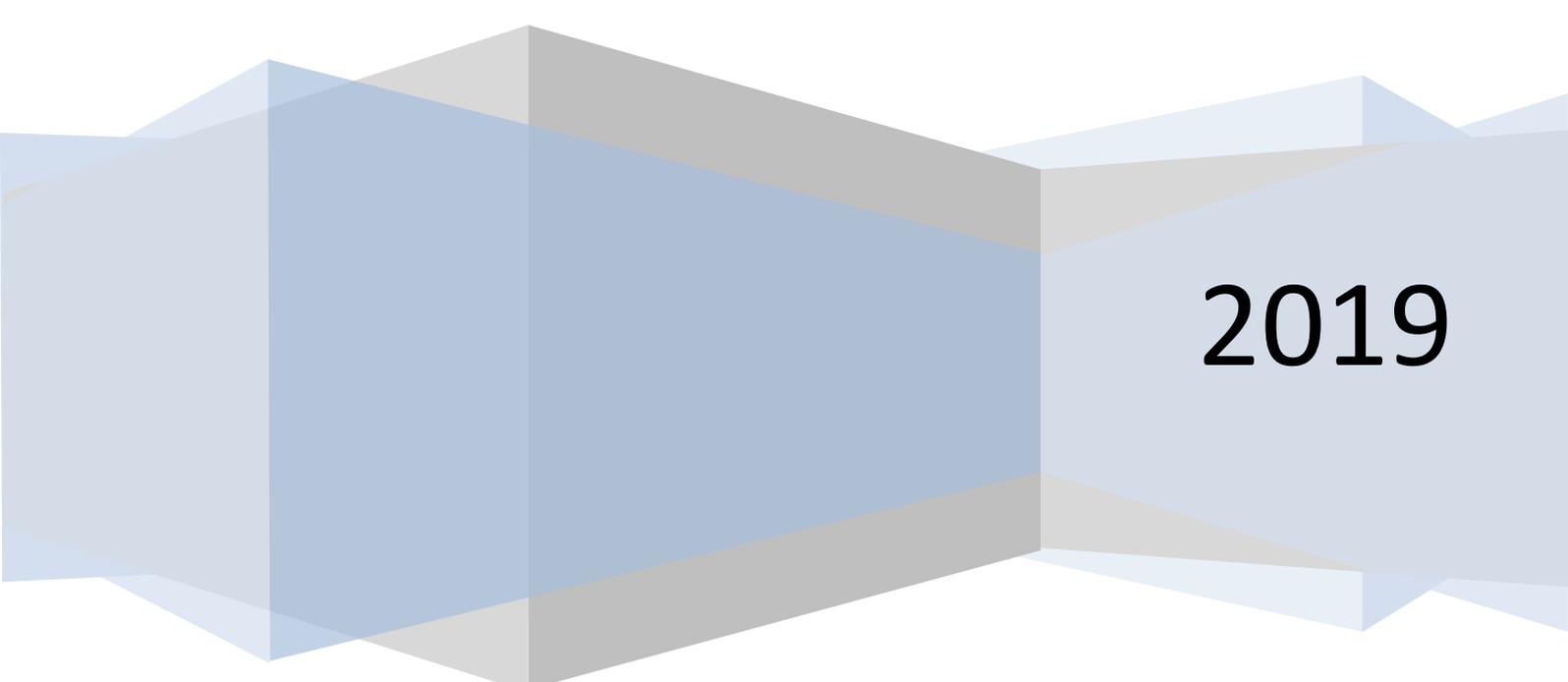


PPP WORKPLAN

Developed by the Staff and Managers, with
support from the Board and Committee
Members

June 2019



2019

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Foreword

The key strength of the Public Protection Partnership has been the ability of each partner to share common goals and recognising the need for compromise to deliver a good service to the public.

There have been many operational difficulties in bringing three Councils together, some still to overcome, but the ability to scale up expertise in the professional fields of Environmental Health, Licensing and Trading Standards has led to dramatic changes in the way criminal behaviour is dealt with in the local area.

In a very difficult financial environment, information is now available to officers which previously would have been lost or never collected, helping vulnerable residents against unscrupulous traders, the physical and mental health of communities is being protected using a broad range of interventions and effective communications and the local environment is being monitored to minimise any risk of harm or contamination.

It is vital that the partnership evaluates its use of resources on a regular basis, and makes the right decisions using the best available evidence. Some significant staffing changes have been required over the last twelve months and inevitably this has had an impact on both the staff and the public facing service. What is clear from the work carried out over the last year is that the ability to focus on the most important issues, the most vulnerable people and the most serious cases is absolutely essential.

This workplan is designed to help provide some clarity about the work of the partnership and build on the hard work of the excellent and dedicated staff who deliver these important roles for the community.

Public Protection Partnership Joint Management Board

(Damian James – Assistant Director – Bracknell Forest Borough Council, Clare Lawrence – Assistant Director – Wokingham Borough Council, Paul Anstey – Head of Service – West Berkshire Council)

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

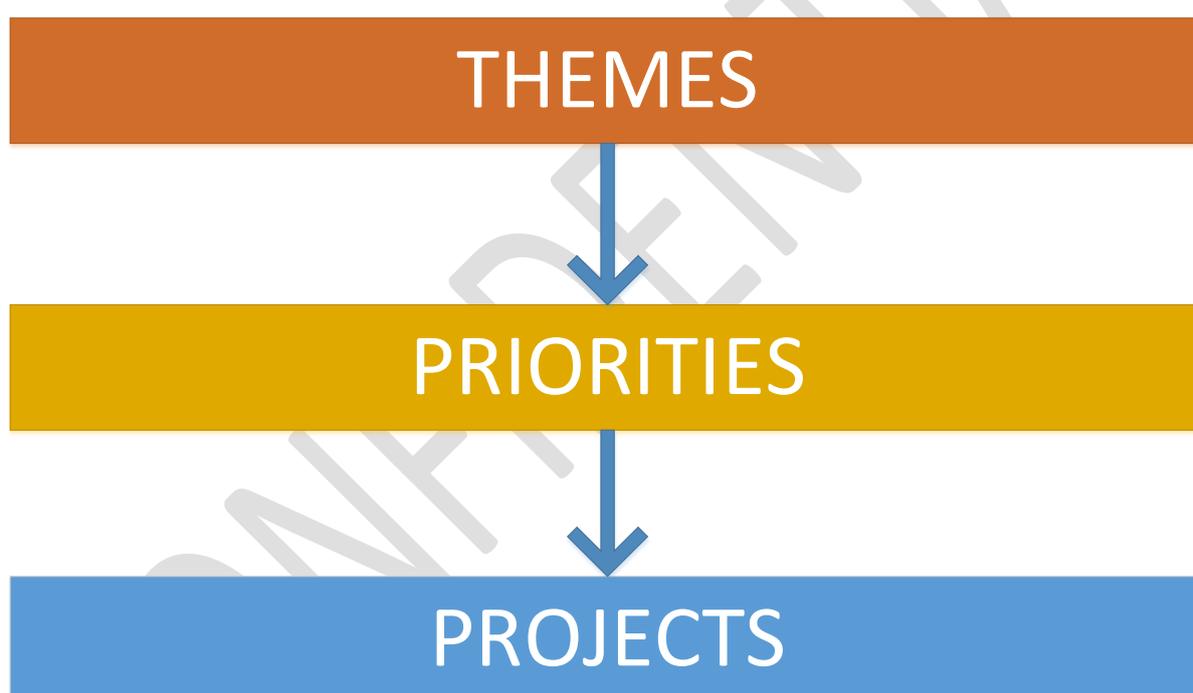


1. Introduction

This workplan, previously referred to as the ‘Strategic Assessment’, is produced each year to help communicate the way in which the service brings together national, regional and local information to decide the areas of work which will have the greatest positive impact on the communities it serves.

If successful, the workplan will show a clear path for how the service will operate over the next 12 months, explaining how it arrived at its conclusions.

There are three key elements to the workplan:



Themes are designed to be top level, broad subject headers which match up with the most important and relevant areas of the three partner Council's Strategies. It is also important to be mindful of the many organisations that work in related fields and what they consider to be their priorities.

Priorities are the more specific areas of work that have been shown to be most important to the areas of Bracknell, West Berkshire and Wokingham.

Projects are the way the service will deliver the priorities, bringing together the expertise of the staff to solve problems which affect the communities we serve.

2. Executive Summary

The partnership is responsible for ensuring an appropriate level of service across a very broad range of topics, including the compliance with, and enforcement of hundreds of pieces of legislation. This combines with a significant amount of preventative and educational work designed to minimise the impact of crime, poor health and a polluted environment.



3. Key Findings from 2018-19

There are three broad types of workload the partnership handles:

- Reactive (responding to and investigating complaints and requests for service).
- Projects (defined pieces of work that are linked to the Themes and Priorities).

- Planned Work Activity (PWA – routine audits, inspections, investigations etc. - this is a workload described in more detail at section 12)

3.1. Reactive

The partnership monitors trends in both demand and activity to assist in the effective deployment of resources but also to provide useful data on what issues are affecting their local communities.

It is characteristic of the demands placed upon the partnership that issues affecting peoples finances, their immediate local environment and a heightened sense of protecting the vulnerable in society appear most frequently. This is the first opportunity the partnership has had to evaluate its demands and share with a wider audience how it intends to try and manage these with the resources that are available.

The total level of demand on the partnership is varied but some examples have been listed below to help give some context:

Requests for service (all types) from residents and businesses = 12,287

- In terms of resources this can range from a short telephone call to a complex investigation involving multiple professional officers' e.g. online counterfeit goods, allegations of nuisance, neighbourhood concerns, complaints about taxi drivers, unsafe working conditions, poor food hygiene standards etc.

Planning Applications (requiring technical input) = 828

- Each application can create complex casework to review technical documentation and produce reports for planning decision. This is a highly political area of work and inevitably there are long term harm implications for residents, businesses and the Councils themselves.

Workplace Accidents = 173

- This can range from simple paper exercises through to detailed criminal investigations under health and safety legislation. The harm can range from individual health through to business efficiency.

Infectious Disease Notifications = 760

- This work may lead to outbreak investigations of individuals or communities and liaison with Public Health England on potential enforcement if linked to food businesses.

Road Traffic and Weight Restriction Investigations = 61 total (22/39 respectively)

- Many rural communities are affected by heavy goods vehicles and the impact of overloaded vehicles on public safety and the road network can be significant. Complaints often lead to site visits, investigation and court action.

Doorstep Crime Incidents = 299 (to end of March 2019)

- Total money paid out in Doorstep Crime Incidents - £988,370
- Total Money saved as a result of interventions - £50,295
- Total number of interventions when offender at premise – 39
- Total number of sanctions detections - 18
- This can often lead to complex investigations involving multiple professional officers. There is an increasing demand on supporting victims of such incidents, particularly to minimise the risk of them become a repeat victim.

Investigations into taxi drivers = 6

- This work includes enforcing requirements under the Equality Act 2010 and ensuring taxi drivers carry passengers using wheelchairs. These issues can harm an individual's mental health and local businesses.

Unlicensed Houses in Multiple Occupation Investigations = 8

- Landlords who rent out properties to people/families without a licence creates complex case work for officers and potential enforcement which can lead to appeals at the First Tier Tribunal (like magistrates courts but for property and land issues). These cases can result in significant harm on individuals and communities.

Cases which involved complex money laundering investigation = 12

- A growing trend in partnership workloads is the identification of criminals who find elaborate ways to generate financial gain from their victims. This requires a more detailed level of investigation by accredited officers with the aim of returning money to victims and sometimes identifying money that can be confiscated.

Cases which involved confiscation under proceeds of crime = 9

- Where complaints (or other partnership activity) identify criminal offences that involve people who have gained financially from others it is stated policy to make every effort to recover their assets. This is complex and specialist work which takes a long time to investigate.

Cases managed on behalf of clients = 104

- The partnership manages legal actions for RBFRS and Oxfordshire County Council TS and FRS. Most common are overseeing fire safety investigations and enforcement, fraud, unfair trading, road traffic, smuggling, animal welfare and counterfeiting investigations.

3.2. Projects

The partnership selected 64 projects in 2018/19, examples of those completed include;

- Air Quality Action Plans
- Licensed Caravan Sites

- Doorstep Crime – no cold calling zones
- Counterfeit goods sold online
- Unsafe goods sold online
- Pet animals sold online
- Unlicensed waste carriers
- Outdoor events
- Zero and one star rated food premises
- Communications Strategy and Action Plan
- Health education
- Age restricted sales e.g. think 21 and vaping
- Surveying areas for Houses in Multiple Occupation
- Standardising planning conditions

3.3. Planned Work Activity

Local authorities are required, through a variety of legislative mechanisms, to undertake a range of activities. Some examples have been listed below to help understand the context:

Food Establishments = 3,006

- The more there are the more inspections, audits, samples and complaints are likely to be required.

Taxi and Private Hire Drivers = 1,091

- The more drivers there are, the more administration and compliance audits are required to ensure the public are suitably protected.

Private Sector Housing Inspections (using the Housing Health and Safety Rating System and includes Houses in Multiple Occupation) = 85

- These are often very complex, involve vulnerable people and can lead to enforcement against landlords, some lead to appeals in a First Tier Tribunal.

Private Water Supplies = 322

- The more there are the more administration, risk assessment, sampling and potential enforcement may be required to ensure poor water quality does not lead to illness/outbreaks.

Licences Issued (total number) = 10,671

- The more licenses that are issued increases the levels of administration, investigations, compliance audits, site visits, enforcement, and committee hearings which can lead to court action.

Freedom of Information Requests = 655

- These can vary from a short and quick response, to a detailed audit and lengthy response to a complex question. Officers from across the service can be involved and requires careful co-ordination to avoid reputational issues.

In conclusion, there remains a broad and varied demand placed upon the partnership. Some improvements have been made in prioritising them based on risk but it continues to be a challenge to meet the expectations of the public.

4. Themes

It is important for the partnership to ensure that it remains relevant and in step with current issues affecting the communities it serves. There is an extensive amount of information available from relevant organisations and partners from different professions that should be considered in the workplan. They often point to emerging problems that should be evaluated by the partnership, not necessarily to solve in the short term but as a helpful signpost to gaps in our understanding that require further research. Information collected through this process will help ensure future workplans are based on the best available evidence.

4.1. Community Protection

Problems that the partnership could help solve:

- Anti-Social Behaviour in identified problem areas¹ (linked to problem profiles and the work of colleagues in community safety and Thames Valley Police).
- Child Sexual Exploitation².
- Vulnerable people being scammed (in person and online)³.
- Vulnerable people affected by doorstep selling⁴.
- Aggressive and unreasonable landlords⁵.
- Availability of unsafe consumer goods⁶.
- Availability of unsafe animal feed⁷.
- Businesses conducting unfair trading practices⁸.

4.2. Protecting and Improving Health

Problems the partnership could help solve:

- Impact of drugs and alcohol on people of all ages⁹.
- Impact of noise on communities.
- Childhood obesity¹⁰.
- Vulnerable people who are socially isolated¹¹.
- Smoking¹².
- Risk of fire in Houses in Multiple Occupation¹³.
- Risk of illness from contaminated food¹⁴.
- Accidents from inflatable play equipment¹⁵.
- Illness from animal contact at visitor attractions¹⁶.
- Accidents in the hospitality industry¹⁷.

¹ Building Communities Together (West Berkshire Council) 2018-19 Strategic Assessment presentation.

² Included in a range of Thames Valley Police related documents including PCC Strategic Priority and local strategic assessments– see references.

³ Included in both the Annual Business Plan 2018-19 (National Trading Standards) and the PCC Strategic Priorities.

⁴ Annual Business Plan 2018-19 (National Trading Standards)

⁵ Annual Report 2017/18 (Shelter)

⁶ Strengthening national capacity for product safety 2018-2020 strategy (Office for Product Safety and Standards) (2018)

⁷ Annual Business Plan 2018-19 (National Trading Standards)

⁸ Annual Business Plan 2018-19 (National Trading Standards)

⁹ Cited as both a Thames Valley Police and Health and Wellbeing issue – see references.

¹⁰ West Berkshire Joint Health and Wellbeing Strategy 2017-2020

¹¹ Cited in all the Joint Health and Wellbeing Strategies – see references.

¹² Cited in all the Joint Health and Wellbeing Strategies – see references.

¹³ Integrated Risk Management Plan – Modelling Methodology 2018/19 (Royal Berkshire Fire and Rescue Service)

¹⁴ National and regional studies planning chart (Public Health England) (2019)

¹⁵ Setting local authority priorities and targeting interventions (LAC67-2 Revision 8) (Health and Safety Executive) (2018)

¹⁶ Setting local authority priorities and targeting interventions (LAC67-2 Revision 8) (Health and Safety Executive) (2018)

¹⁷ Setting local authority priorities and targeting interventions (LAC67-2 Revision 8) (Health and Safety Executive) (2018)

- Accidents in the catering industry¹⁸.
- Impact of contaminated private water supplies¹⁹.

4.3. Protection of the Environment

Problems the partnership could help solve:

- Levels of air pollution in sensitive areas²⁰.
- Level of demand for single-use plastic²¹.
- Food supply chain emissions and waste²².
- Fly-tipping and waste criminality²³.
- The risk of chemical contamination in our water²⁴.
- Response to an environmental incident²⁵.

4.4. Supporting Prosperity and Economic growth

Problems the partnership could help solve:

- Lack of productivity and growth in small and medium sized businesses²⁶.
- Lack of partnership between government and industry²⁷.
- Risk to the reputation of UK export of food²⁸.
- Risk to intellectual property²⁹.
- Uncertainty over regulatory changes related to Brexit.

4.5. Effective and Improving Service Delivery

Problems the partnership should be solving:

- Improving its use of ICT.
- Developing its staff.
- Improving governance.
- Improving its accommodation.

¹⁸ Setting local authority priorities and targeting interventions (LAC67-2 Revision 8) (Health and Safety Executive) (2018)

¹⁹ Drinking Water 2017 (Drinking Water Inspectorate) (2018)

²⁰ Cited in all the Joint Health and Wellbeing Strategies – see references

²¹ A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018

²² A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018

²³ A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018

²⁴ A Green Future: Our 25 Year Plan to Improve the Environment (HM Government) 2018

²⁵ Annual Report 2017-18 (Environment Agency)

²⁶ Features in both National and Regional Industrial Strategies – see references

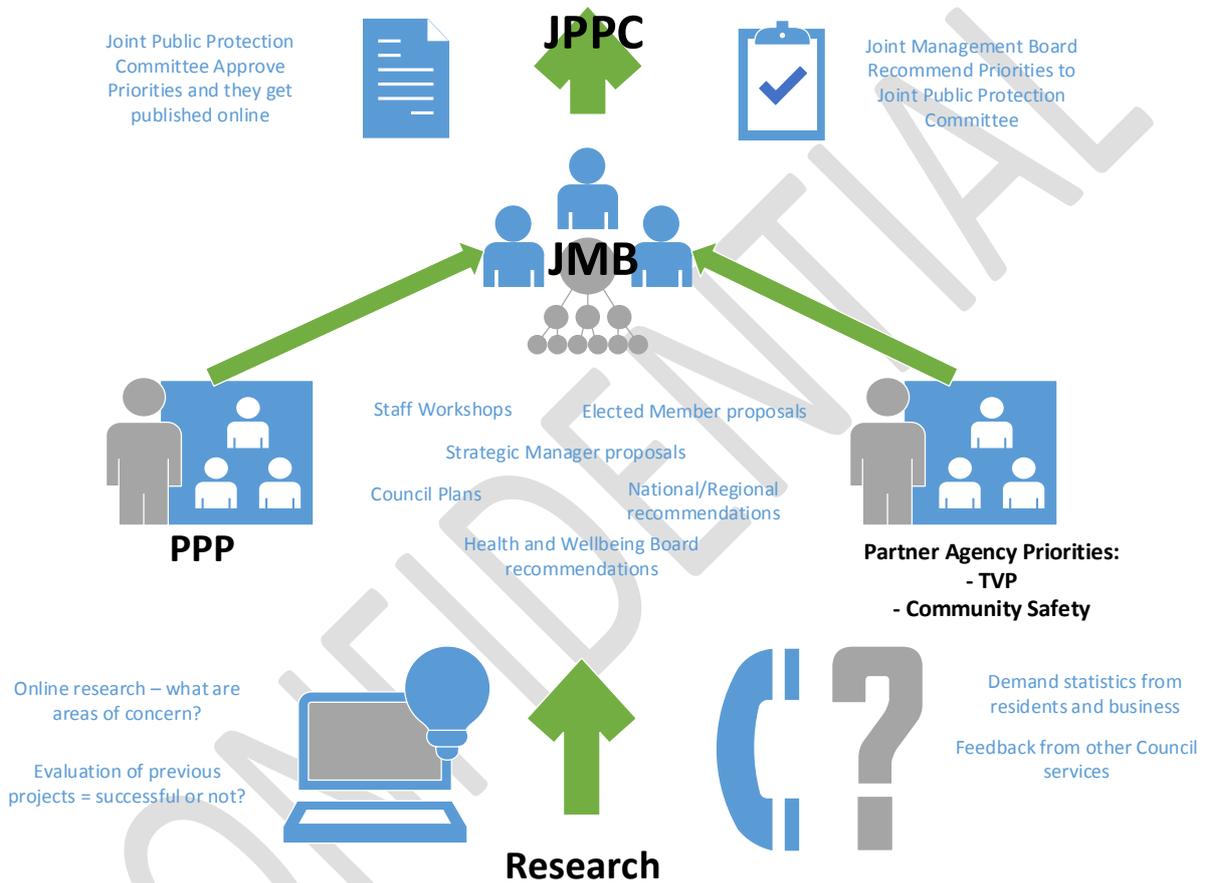
²⁷ Features in both National and Regional Industrial Strategies – see references

²⁸ Annual Business Plan 2018-19 (National Trading Standards)

²⁹ Annual Business Plan 2018-19 (National Trading Standards)

- Developing a stronger marketing strategy.
- Improving its communication (internal and external).

5. How is the Workplan created?



6. Priorities

6.1. Cross Cutting Priorities

6.1.1. eCrime:

The partnership will look for opportunities to tackle consumer and business detriment caused by eCrime across all its themes, priorities and projects. Staff will be developed to deal with the ongoing challenges of online trading, complex social media platforms and all the associated

intelligence gathering required to successfully disrupt and prosecute such matters.

6.1.2. Organised Crime Groups:

The scale and complexity of investigations that the partnership are required to conduct has demanded considerable officer and management resources. Issues such as financial investigations, proceeds of crime, complex fraud across multiple borders, sometimes international, require careful risk management and the PPP will be investing in people and equipment to deal with this.

6.1.3. Protecting Vulnerable Adults and Children:

The number and complexity of investigations involving people from recognised vulnerable groups has driven the partnership to adapt its risk management approach. Skills in communication, safeguarding and partnership working have never been more important in the workloads of officers and managers. This will be a key consideration in any priorities and projects initiated.

6.1.4. Modern Day Slavery:

There has been a 35% increase in referrals in 2017 across the UK³⁰ and Thames Valley Police continue to run a number of operations looking at the issue of exploitation where people are being kept in poor conditions and forced to work for limited financial reward. An anti-slavery network has been set up across the Thames Valley. The partnership must be alive to this risk and all priorities and projects should be evaluated to consider how it may be able to improve the intelligence picture.

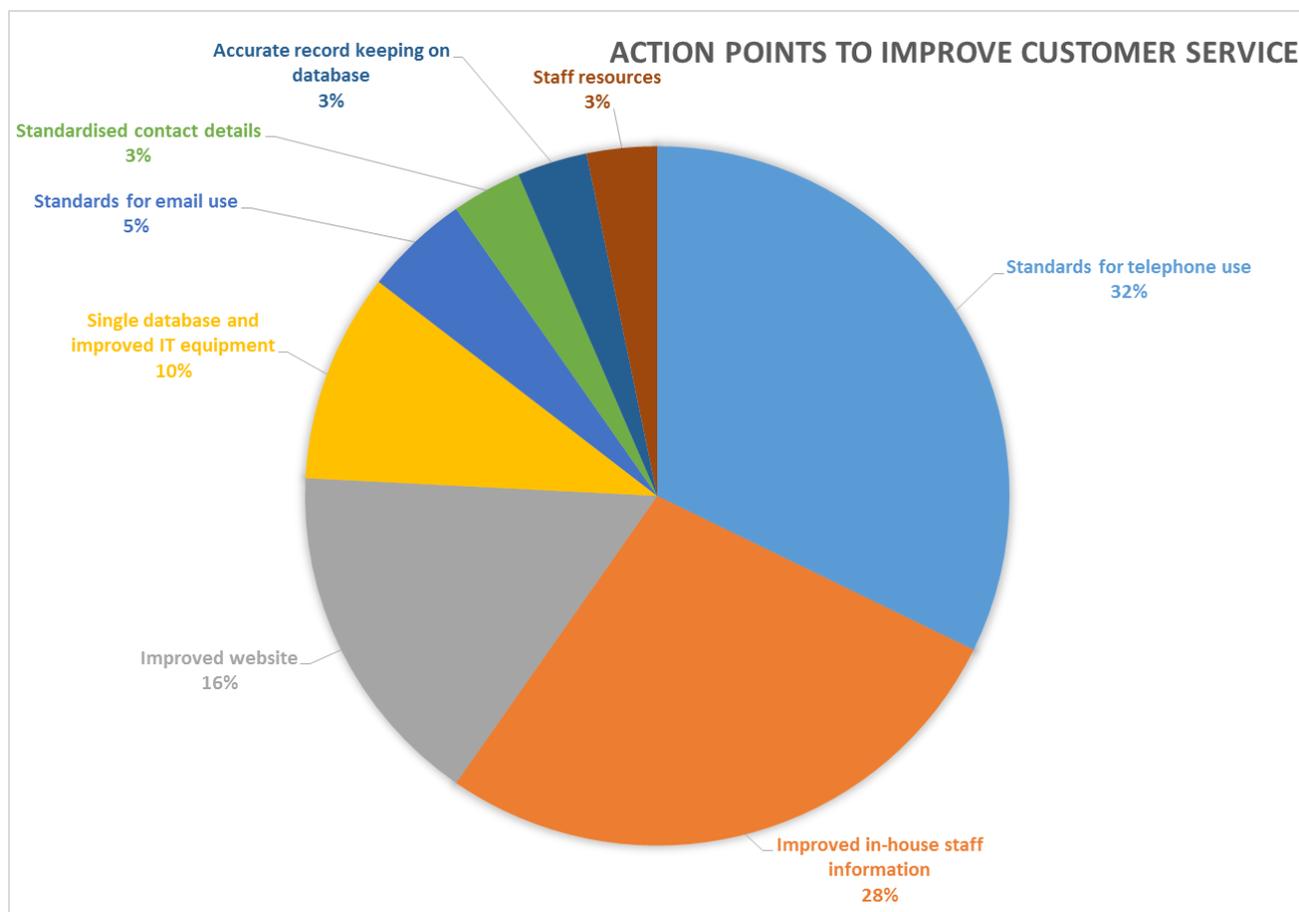
7. Staff Workshops

An important feature of the process this year was to improve the profile of staff feedback. It is key to the success of the service to have staff that feel their views are valued and can see that they can influence the priorities.

³⁰ Building Communities Together (West Berkshire Council) 2018-19 Strategic Assessment presentation.

7.1. Customer Service

Across the 2 workshops held, 126 suggestions were made and once grouped into broad categories table 1 below shows the results.

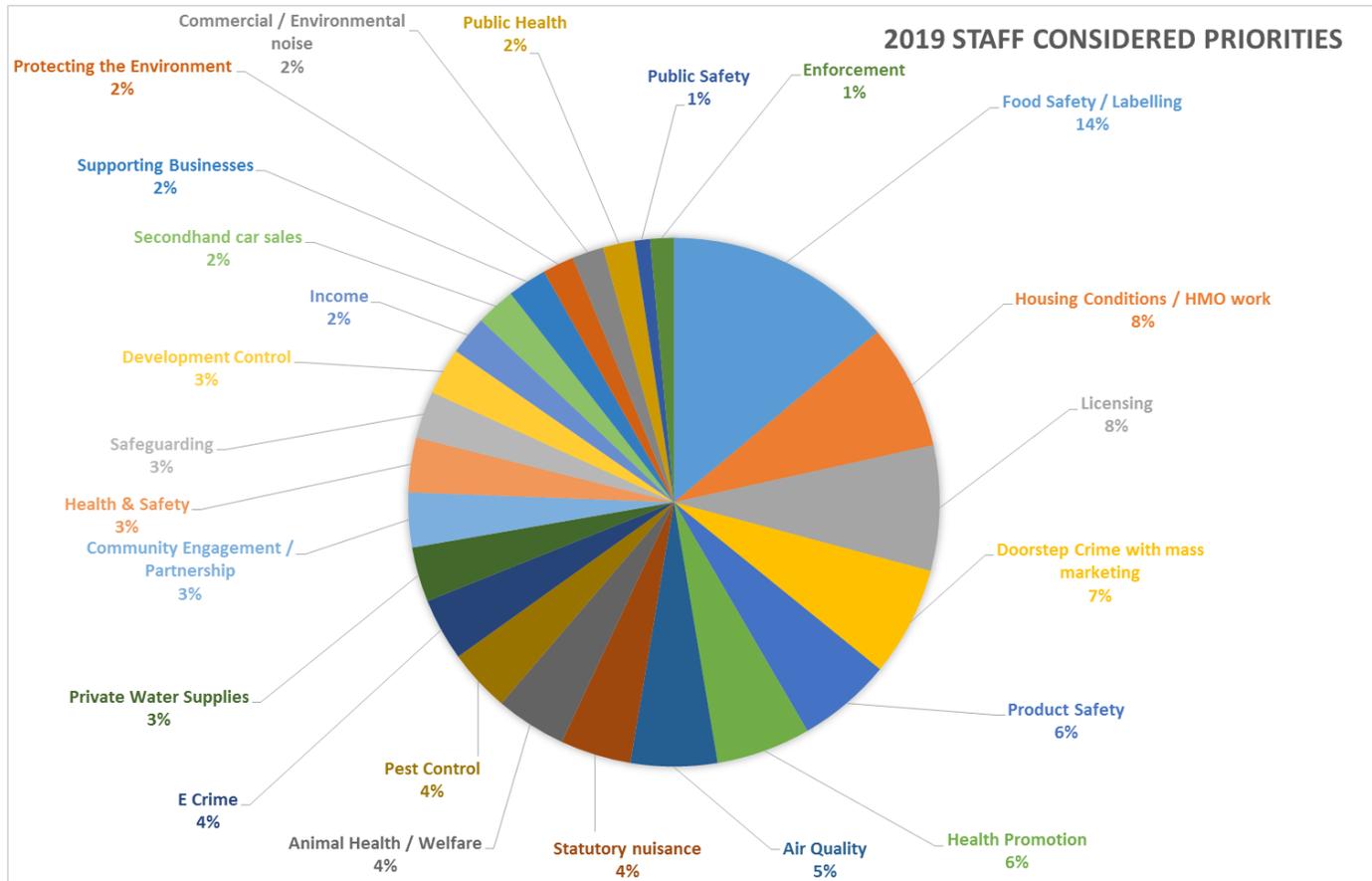


7.2 Staff Feedback on Priorities

Across the 2 workshops there 209 suggested priorities; the top 5 were:

1. Food Safety/Labelling
2. Housing Conditions/HMO Work
3. Licensing
4. Doorstep Crime with Mass Marketing
5. Product Safety and Public Health (joint 5th)

Table 2 shows the total responses by percentage.



8. Things to Consider When Deciding a Priority

The partnership will apply the Management of Risk in Law Enforcement (MoRiLE)³¹ scoring to assist in the priority setting of operational work. This is a system developed by the National Police Chiefs Council (NPCC) to support decision making and fits very well with the way the partnership works.

³¹ The Management of Risk in Law Enforcement (MoRiLE) programme is governed through the UK National Police Chiefs Council (NPCC) Intelligence Portfolio Group. <https://polmorile.files.wordpress.com/2017/12/morile-programme-briefing-note-december-2017.pdf>

It helps compare alternate so the partnership can explain why it makes the choices it does, helps show value for money and remove bias from prioritisation.³²

Understanding the harm that may come from different issues or incidents is key to the partnership:

Individual and Community Harm

- Risk to life and limb.
- Long term exposure to harmful substances.
- Mental health.

Environmental Harm

- Risk of contamination to the air, land or water.
- Loss of biodiversity or ecosystem.

Financial Harm

- Risk to people's money.
- Risk to legitimate business's money.

Organisational Harm

- Issues which have the ability to show the partnership or its partner authorities in a negative light.
- Issues which undermine the rule of law.
- Failure to meet a legal requirement placed upon the partnership.
- Opportunity to prevent further incidents through positive media coverage.
- Manifesto pledges.
- Supported policy or strategy.
- Public statements on specific subjects.

Organisational Financial Harm

- Setting a precedent that commits future finances.
- Identified income target.
- Established grant or contribution.

³² National Crime Agency http://www.excellenceinpolicing.org.uk/wp-content/uploads/2018/09/3-5_MoRiLE.pdf

In addition to considering the harm of something occurring, it is also necessary to take a view on how likely it will happen and then the partnership considers how it is set up to deal with these issues or events.

9. Priorities Being Kept from 2018/19

- E-Crime
- Organised Crime Groups
- Vulnerable Adults and Children
- Modern Day Slavery
- Doorstep Crime and Mass Marketing
- Poor Housing Standards in the Private Rented Sector
- Air Pollution
- Unsafe Food

10. New Priorities for 2019/20

- Childhood Obesity
- Alcohol and Tobacco Consumption
- Poor Animal Welfare
- Risk to the Reputation of UK Export of Food
- Accidents in the Catering and Hospitality Industries
- Impact of Noise on Communities
- Unsafe Consumer Goods

11. Projects

Each **Project** will link to a **Priority**, which in turn links to a **Theme**.

11.1 The 2019-20 Projects List

Examples for 2019/20 are given below:



Doorstep Crime

- No Cold Calling Zones
- Patrols



Impact of Noise on Communities

- Outdoor events
- Anti-Social Behaviour



Food

- High risk allergens
- 0 and 1 Score Premises
- Animal Feed
- Animal Health and Welfare



Unsafe Consumer Goods

- Electrical goods
- 2nd hand cars
- Markets and Car Boots

Supplies



Alcohol and Tobacco Consumption

- Underage sales
- Community alcohol partnerships
- Licensing



E-Crime

- Pet sales
- Unsafe goods
- Counterfeit goods
- Commercial waste collections



Housing

- Energy performance certificates
- Seasonal worker living conditions
- Caravan sites
- Unlicensed



Pollution

- Air quality action plans
- Industrial permitting
- Energy performance-commercial



Mass Marketing

- Reducing vulnerability to scams
- Building relations with financial institutions
- Victim Support

These are designed by the Joint Management Team, in consultation with key technical staff, to provide everyone involved with a clear steer on how to deliver the priorities. This will improve the allocation of resources, ensure consistency and develop the strength of governance across the partnership.

11.2 Joint Management Board Projects 2019/20

In response to an external review of the partnership the Joint Management Board has created its own list of projects. These focus on the way the partnership works, and what areas needs to be improved over the course of the legal agreement.

ICT Support Systems	Governance Model
ICT Strategy	Board Visibility
Single Case Management System	Accommodation Strategy
Staffing Strategy	Marketing Strategy
Staffing Structure	Communications Strategy

11.3 The 2019-20 Research Projects List

If any member of the partnership has a concern that there is a gap in knowledge, or that a particular method of delivering a service is lacking in a robust evidence base it is important that some of the partnerships resources should be allocated to research and development. This can help build a better understanding of harm, likelihood and operational capacity and a better workplan in future years. Examples of research projects for consideration are listed below:

- How has the partnership impacted on human health by monitoring and assessing Private Water Supplies?
- How do food hygiene inspections influence the rates of reportable infectious disease in the partnership area?
- What is the impact of mediation on neighbour disputes?
- Is weight restriction enforcement effective?
- Does late night taxi rank enforcement improve public safety?
- Should the partnership have a strategy to deal with the GRT community?

- How effective is victim support in reducing their vulnerability (target hardening)?
- Does the partnership have sufficient skills and capacity in its online presence to reduce the risk to local consumers of buying unsafe goods?

The Joint Management Board will consider such projects as they are presented by the Joint Management Team.

12. Planned Work Activity

Work that is carried out by the partnership which is not a priority and is not an identified project is known as 'Planned Work Activity' or 'PWA'.

There are a variety of reasons for the partnership to carry out work that is not an identified priority or a project e.g.

- Response to some form of criminal activity;
- Statutory duty to investigate or inspect;
- Administrative process required as a public body (such as processing applications);
- Income target;
- Internal performance requirement; or
- Local request from elected members.

It is the responsibility of the Joint Management Board and the Joint Management Team to balance the levels of service provided across these different workloads and ensure that the resources are allocated based on the assessment of threat/risk.

An important principle to establish is that when there are difficult decisions to make the Joint Management Board will seek to resource priorities first, projects second and planned work activity last.

The implications of this approach will be managed through the partnership 'Risk Register' and monitored by the Joint Management Board.

13. Partnership Contracts and Service Level Agreements

The partnership has built up a number of areas of expertise that have become possible to sell to others. This inevitably has a bearing on how decisions are made and paying customers must receive the level of service promised to them. In determining priorities the partnership will honour its commitments and make the necessary resources available to meet contractual obligations, these are:

- Case Management Services – Oxfordshire Fire and Rescue
- Case Management Services – Oxfordshire Trading Standards
- Case Management Services – Royal Berkshire Fire and Rescue
- Public Health Services – Youth Tobacco Strategy – Reading Borough Council
- Financial Investigation Services – Reading Borough Council
- Financial Investigation Services – Wokingham Borough Council
- Support with Confidence – Wokingham Borough Council
- London Road Waste Site – Bracknell Forest Borough Council
- Animal Feed Enforcement – Oxfordshire, Surrey, Bucks, Hampshire, West Sussex
- Animal Health and Welfare – Slough Borough Council
- Level 2 and 3 Investigations – National Trading Standards Board
- Level 2 Case Management – Trading Standards South East Ltd

14. Looking Ahead

A PESTEL (Political, Social, Technological, Environmental, Legal and Organisational) analysis was undertaken as part of the workplan process. See below for the Headlines:

Political

Local

- May Elections – all PPP partners are affected. There is a likely impact on priorities and finances, particularly if there is a significant turnover of members.
- Manifesto pledges from main parties across the PPP area include much more focus on the ‘Climate Emergency’ and the need to reduce carbon emissions.

National

- Outcome of the Brexit negotiations including possible new powers of certification
- New leader of the Conservatives
- New legislation on letting agents fees

Economic³³

Local

- The Berkshire Local Enterprise Partnership has highlighted that according to ONS data Berkshire's economy generated output (GVA) is valued at £37.8Bn in 2017 (2nd only to London).
- 580,000 people are employed across Berkshire.
- 43,000 Berkshire residents commute to London.
- Cost of living remains a concern in the PPP area.
- Food bank use is on the increase.
- Both West and Central Berkshire Functional Economic Market Areas are constrained for future growth.
- A major site at Grazeley is being investigated and this could offer a focus for future growth.
- Strong rural economy.
-

National

- The UK Economy, according to the Bank of England is expected to ##
- Universal Credit is still being rolled out.
-

Social

Local

- Berkshire has a population of just over 900,000³⁴.
- Pressures from immigration.
- Increase in threat from terrorism.
- Rise in organised crime gang activity.
- Major investment in digital infrastructure could change commuter habits across the region.
- Housing stock is increasing; between 2006 and 2016 it grew by 27,000

³³ Berkshire Local Industrial Strategy (Thames Valley Local Enterprise Partnership) (2018)

³⁴ Berkshire Local Industrial Strategy (Thames Valley Local Enterprise Partnership) (2018)

<p>dwellings.³⁵</p>
<p>National</p> <ul style="list-style-type: none"> Major infrastructure projects could change commuter habits across the region e.g. Crossrail and HS2.
<p>Technological</p>
<p>Local</p> <ul style="list-style-type: none"> Increased risk to data of all types and impact of ‘cyber-crime’ to the public through social media and network sites. Increase in the use of cryptocurrency. Smart cities agenda could drive innovation.
<p>National</p> <ul style="list-style-type: none">
<p>Environmental</p>
<p>Local</p> <ul style="list-style-type: none"> Flooding risk in PPP areas. Heathrow expansion. Increased interest in the development of electric vehicle infrastructure. Reduced supply chain costs for solar technology.
<p>National</p> <ul style="list-style-type: none"> Climate change – flooding and impact on agriculture. Loss of feed in tariffs for solar technology.
<p>Legal</p>
<p>Local</p> <ul style="list-style-type: none"> Capacity remains an issue across legal teams
<p>National</p> <p>Key legal/legislative changes in 2018/19 include:</p> <ul style="list-style-type: none">

15. Evidence Gaps

- Data from Wokingham on Modern Day Slavery.

³⁵ Berkshire Local Industrial Strategy (Thames Valley Local Enterprise Partnership) (2018)

- Data from Thames Valley Police on Child Sexual Exploitation.
- Impact of Gypsy Roman Traveller Community on the PPP areas.
- Regional and/or national data on poor quality housing in the private rented sector.

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