

Notice of Meeting

Joint Public Protection Committee

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

Tuesday 11 June 2019 at 6.30pm

Venue: Wokingham Borough Council, Shute End, Wokingham,
RG40 1BN

To: Councillors John Harrison (Bracknell Forest Council), John Porter (Bracknell Forest Council), James Cole (West Berkshire Council), Hilary Cole (West Berkshire Council), Parry Bath (Wokingham Borough Council) and Chris Bowring (Wokingham Borough Council)

Part I

Page No.

- 1 **Apologies**
To receive apologies for inability to attend the meeting.
- 2 **Election of the Chairman and Appointment of the Vice-Chairman for the 2019/20 Municipal Year**
To elect the Chairman and appoint the Vice-Chairman for the 2019/20 Municipal Year.
- 3 **Minutes from the previous meeting**
To approve as a correct record the Minutes of the meeting of this Committee held on 18 September 2018. 1 - 6
- 4 **Declarations of Interest**
Any Member with a Disclosable Pecuniary Interest in a matter should withdraw from the meeting when the matter is under consideration, and should notify the Democratic Services Officer in attendance that they are withdrawing as they have such an interest. If the Disclosable Pecuniary Interest is not entered on the register of Members' Interests, the Monitoring Officer must be notified of the interest within 28 days.

Public Protection Partnership Agenda - Tuesday, 11 June 2019 (continued)

5 Notice of Public Speaking and Questions

To note those agenda items which have received an application for public speaking.

A period of 30 minutes will be allowed for members of the public to ask questions submitted under notice.

The Partnership welcomes questions from members of the public about their work.

Subject to meeting certain timescales, questions can relate to general issues concerned with the work of the Partnership or an item which is on the agenda for this meeting. For full details of the procedure for submitting questions please contact Democratic Services.

6 Future Plan

To detail future items that the Committee will be considering.

Items to Execute Executive Functions

7 Public Protection Partnership 2018/19 - Year End Performance Report

7 - 32

To inform the Committee of the 2018/19 performance outturn for the Public Protection Partnership.

8 Public Protection Partnership - Service Review

33 - 46

To inform the Committee of the outcome of the review of the Public Protection Service and to update on the progress on implementation and seek approval for operational delegations relating to the new structure.

9 Public Protection Partnership Priorities 2019/20

47 - 110

To set out to the Committee the proposed priorities for the Public Protection Service for 2019/20 and to seek agreement on those priorities as well as the outline work plan to deliver against the identified priority area. These key documents have been developed to inform and direct our proactive project, intervention and enforcement activities as part of our adaptation of the National Intelligence Model.

Public Protection Partnership Agenda - Tuesday, 11 June 2019 (continued)

10 Public Protection Official Feed and Food Control Service Plan 2019-20 111 - 138

This report accompanies the Official Feed & Food Controls Service Plan 2019-2020 ("the plan"). The Committee are asked to agree the items summarised in appendix A to this report which are taken from the plan, and to note the plan at appendix B. Appendix C provides supporting information.

The plan essentially documents the services' involvement with feed and food official controls alongside the partnerships aspirations to deliver on inspections and audits across the three authority's in line with the PPP model of delivery.

Items for Information

11 Any other items the Chairman considers to be urgent

Contact Officer:

Moira Fraser, Strategic Support, West Berkshire Council, Council Offices, Market Street, Newbury RG14 5LD

Email: moira.fraser@westberks.gov.uk **Tel:** 01635 519045

This meeting may be filmed for inclusion on the Council's website. Please note that other people may film, record, tweet or blog from this meeting. The use of these images or recordings is not under the Council's control.

This page is intentionally left blank

Note: These Minutes will remain DRAFT until approved at the next meeting of the Committee

JOINT PUBLIC PROTECTION COMMITTEE**Minutes of the meeting held on
TUESDAY, 18 SEPTEMBER 2018****WOKINGHAM BOROUGH COUNCIL, SHUTE END, WOKINGHAM, RG40 1BN**

Present: Norman Jorgensen, Marcus Franks, Emma Webster, Nick Allen and Iain McCracken

Also Present: Sean Murphy (Public Protection Manager), Paul Anstey (Head of Public Protection and Culture), Anna Smy (Team Manager - Environmental Quality), Claire Lockwood (Lead Officer - Community Engagement, Public Protection Partnership), Clare Lawrence (Wokingham Borough Council), Damian James (Chair of the PPP Joint Management Board), Jo Reeves (Principal Policy Officer) and Peter Baveystock (Wokingham)

PART I**57 Minutes from the Previous Meeting**

The minutes of the previous meeting held on 12 June 2018 were approved by the Committee and signed by the Chairman.

The Chairman welcomed Damian James to the Committee who had recently been appointed the Assistant Director for Contract Services for Bracknell Forest Council.

The Chairman also invited officers to participate fully in the discussions of the Committee.

58 Declarations of Interest

In the course of the discussion, Councillors Iain McCracken and Emma Webster declared an interest in Agenda Item 7.

59 Notice of Public Speaking and Questions

No public questions were submitted.

60 Future Plan

The Committee noted the Future Plan. Anna Smy updated that three reports would be added to the agenda for the December meeting regarding operational delegation of work, implementation of the external review and the performance report.

61 PPP Communications Report August 2018

The Committee considered the PPP Communications Evaluation Report (Agenda Item 8). In introducing the report, Claire Lockwood advised that her role was to raise public awareness of the PPP and encourage community engagement. The report set out the activities that had been undertaken to support the key priorities in the PPP Communications Strategy.

Councillor Iain McCracken noted that the total digital reach was presented at 3.5m and asked what the target was. Claire Lockwood advised that a target had not been set due to resource implications, however the PPP had gained knowledge of what they could achieve. Councillor Emma Webster asked how digital reach was defined. Claire

JOINT PUBLIC PROTECTION COMMITTEE - 18 SEPTEMBER 2018 - MINUTES

Lockwood responded that organisations such as media outlets provided the data and had their own definitions.

Councillor Webster commented that while the figures were impressive, digital reach needed to be targeted to individuals within the PPP's geography in order to be relevant and to ensure resources were being directed appropriately. The pick-up rate of press releases into news outlets, for example, might be a more effective way to measure the PPP's impact. Claire Lockwood highlighted that the PPP had one communications officer and resources were limited.

Paul Anstey advised that performance targets had not been set in relation to the PPP's communications work and the overarching aim was to use the PPP's profile for demand management and to gather intelligence. There had been a significant improvement in communications with staff and Members since Claire Lockwood came into post. However, as the post was additional capacity rather than part of the core staffing, it had been necessary to consider resourcing when setting the ambitions for the Communications Strategy.

Councillor McCracken expressed the view that the report had provided Members with an informative and invaluable insight and thanked Claire Lockwood. He expressed support for a proactive and positive approach to communications.

Claire Lockwood, in answering a question from Councillor McCracken regarding relationships with the Councils' Communications Teams, advised that a draft protocol had been developed and was optimistic about strengthening working relationships.

Councillor Marcus Franks expressed the view that the PPP was also trying to achieve business development through its communications work and it was important this was reflected in future iterations of the report. It was also important that PPP officers could be involved in social media responses; Claire Lockwood confirmed she was.

Councillor Norman Jorgensen stated that he had found the Members' bulletins useful and he requested that in future all press releases were circulated to JPPC Members. **(Action: Claire Lockwood)**.

Sean Murphy reported that the PPP's website would be launched in November and Members would have an opportunity to see it in advance. **(Action: Sean Murphy)**. Sean Murphy also reported that the PPP was participating in a BBC programme regarding rogue traders.

RESOLVED that:

The JPPC noted the PPP Communications Evaluation Report and the PPP Brand Guidelines and Style Guide; agreed to circulate them to appropriate members; and gave guidance regarding the PPP communications function.

The following documents would be rolled out in September and sent to all PPP Members and all Partner authority Members:

- PPP Communications Evaluation Report – The difference communications is making (9 October 2017-30 June 2018)
- PPP Brand Guidelines and Style Guide

62 Draft Revenue Budget 2019/20

The Committee considered a report (Agenda Item 6) which set out the draft Revenue Budget for 2019/20 including fees and charges. In introducing the report, Sean Murphy explained that the Inter-Authority Agreement, which established the PPP, had set a percentage contribution required from each local authority. Officers were satisfied that these contribution proportions were still correct. After publication of the agenda, officers

JOINT PUBLIC PROTECTION COMMITTEE - 18 SEPTEMBER 2018 - MINUTES

had learnt that the correct uplift to pension contributions had not been applied for Wokingham and West Berkshire and a corrected report had been issued.

The report proposed an overall budget reduction of £145k in recognition of the financial pressures facing each of the local authorities.

Sean Murphy clarified that the Committee's role was to recommend a budget to each of the three local authorities, who would take the final decision.

Councillor Nick Allen enquired what impact the budget reduction would have. Sean Murphy advised that a review of the PPP service was being undertaken and it was likely that a number of efficiencies would be proposed to the December meeting of the JPPC. Sean Murphy also clarified that West Berkshire Council's contribution would be 40.01% of the total PPP budget in 2019/20.

Councillor McCracken stated that it would be useful for the report recommendations to clarify the overall net budget the Committee were being asked to set.

Councillor McCracken enquired whether the £145k savings would be achievable and whether a similar level of savings might be required in 2020/21. Paul Anstey advised that following the implementation of the operating model and vacancies which had arisen, the opportunity had been taken to commence a review and officers were confident that efficiencies identified in the review would lead to the savings being achieved. Damian James advised that officers would monitor the situation throughout 2019/20 and evaluate the budget where necessary.

Councillor Franks stated that West Berkshire Council had asked whether it would be possible to reduce the budget and was mindful that he did not want to harm the PPP. He was confident that the PPP would not be harmed and would deliver the service in an efficient way.

Councillor Allen stated it was difficult to understand the proposed budget for 2019/20 without the current year budget being included in the report. Sean Murphy advised that Appendix A to the report contained further information.

Sean Murphy outlined that a schedule of fees and charges had been included in the report. The JPPC had agreed to apply a full cost recovery methodology to fees and charges at a previous meeting. Officers had also sought to make fees and charges consistent, focusing on high impact areas such as taxi and private hire fees in the first instance.

Councillor Franks expressed his support for a standard charging regime across the three local authority areas and enquired whether the requirements on taxis were the same across the areas. Sean Murphy advised that some work was required to standardise policies. Councillor Franks suggested that some proactive communications around the proposed fees and charge might help to mitigate any concerns raised by the trade. Sean Murphy advised that the proposed fees and charges would be subject to statutory consultation and require approval by each council's Licensing Committee.

The Committee noted that where there was a blank column on page 27 of the agenda, the fees would remain the same as the previous year and 2.5% should be added where 'n/a' was shown against ice cream sellers.

Councillor Webster stated that she was supportive of the approach and noted that it would be essential to inform their fellow Council Members of the proposals. She noted that there was also an important message which should be shared with the public regarding the protections that consumers could be confident of when using licensed services. Sean Murphy agreed that the taxi industry was not without risks and proper regulation gave consumers confidence.

JOINT PUBLIC PROTECTION COMMITTEE - 18 SEPTEMBER 2018 - MINUTES

Councillor Jorgensen suggested that Licensing Committees would find the benchmarking information useful. He also expressed that he would like the budget to be set in alignment with the Councils' usual budget setting timescales.

In response to a query from Councillor Nick Allen regarding fees for Disclosure and Barring Service (DBS) checks, Sean Murphy advised that the contractor, Capita, had not yet set their fee but the fee the PPP charged would be the actual cost plus 30 minutes of processing time plus 2.5%.

A discussion was held regarding the differences in the charges applied to taxis between the three local authorities and the influence of the trade associations was noted.

RESOLVED that:

The Committee agree the Joint Management Board's proposal for a contribution reduction of £145K as set out in paragraph 5.4 of the corrected report.

The Committee recommend to the Councils the contributions set out at Table 2 at 5.8 in the report along with the fees and charges set out in Appendix B, subject to the amendments highlighted in the discussion (above).

The JPPC recommends that the proposed net budget of the Public Protection Partnership for 2019/20 is £3.404m.

63 Public Protection Partnership Performance Report and Strategic Projects Update

The Committee considered a report (Agenda Item 7) which sought to inform the Committee of the current performance of the Public Protection Partnership (PPP) in line with the operating model and business plan and to outline the 2018/19 reporting format in line with the Strategic Assessment 2018/19.

Councillor Webster commended the report which she had found to provide a useful level of detail.

Councillor Allen requested that where there was a target to make an improvement, the previous year's figure be provided in order to demonstrate whether performance had in fact improved.

Regarding the 'red' risk action plans on page 72 and the updated version tabled by Anna Smy, Councillor Jorgensen enquired about accommodation changes. Sean Murphy advised that IT issues were a barrier to colocation and there was an impact on staff morale caused by the service being spread over many areas.

(Councillors McCracken and Webster declared an interest by virtue of the fact that they were members of the Fire Authority and colocation with the Royal Berkshire Fire and Rescue Service had been an option discussed at a previous meeting.)

Councillor McCracken requested further information regarding the implementation of the proposed shared case management system. Anna Smy reported that there had been issues regarding software licenses and she would provide an update at the next meeting. **(Action: Anna Smy).**

In response to a query regarding complaints, Anna Smy advised that many complaints submitted by Councillors were on behalf of residents and further work was required to provide clarity on the source of complaints.

Councillor McCracken commended the presentation of the risk information and requested that future iterations also included completion or revised dates.

RESOLVED that

JOINT PUBLIC PROTECTION COMMITTEE - 18 SEPTEMBER 2018 - MINUTES

The Committee approved the report and noted actions for areas of improvement.

The Committee agreed to the new reporting process outlined in the report.

The Committee agreed that only two Key Performance Indicators outlined in the IAA should be specifically retained:

- Effective budget management and use of resources, and;
- Maintain high levels of customer and business satisfaction.

64 Air Quality Annual Status Report Update

The Committee noted a report for information regarding an update on the Air Quality Annual Status Reports (ASR) 2018. Anna Smy advised that as the Annual Status report had been submitted to the Department for Environment, Farming and Rural Affairs in good time, a quick response had been received. Paul Anstey noted that the timely submission of the report might leave the PPP in a good position should any grants be announced later in the year.

Councillor Webster asked that the latest version be made available on the Councils' websites. **(Action: Anna Smy).**

Post meeting note: the updated reports are available from the following link: <https://info.westberks.gov.uk/airquality>

RESOLVED that the report for information be noted.

65 Any other items the Chairman considers to be urgent

No other matters were raised by the Chairman.

(The meeting commenced at 7.00pm and closed at 8.50pm)

CHAIRMAN

Date of Signature

This page is intentionally left blank

Public Protection Partnership 2018/19 - Year End Performance Report

Committee considering report:	Joint Public Protection Committee
Date of Committee:	11 th June 2019
Report Author:	Anna Smy

1. Purpose of the Report

- 1.1 To inform the Committee of the 2018/19 performance outturn for the Public Protection Partnership (PPP).

2. Recommendations

- 2.1 The Committee NOTES the report and notes actions for areas of improvement.

3. Implications

- 3.1 **Financial:** This end of year budget position for the Public Protection Service was an over-spend of approximately £2.5K. 2018/19 saw continued challenges around income particularly with respect to licensing income. This is considered 'de minimis' within the terms of the Inter-Authority Agreement. This was balanced in year by a combination of holding vacancies and the obtaining of grant funding for certain aspects of our work. The changes to the Houses in Multiple Occupation Licensing regime saw a significant increase in income for this area of work. This money is ring-fenced to HMO licensing work which continues into the new financial year.
- 3.2 **Policy:** The Inter-Authority Agreement (IAA) places a responsibility on the Joint Public Protection Committee (JPPC) to determine service policies and priorities and also to maintain oversight of performance. In March 2018 the Committee set out its priorities for 2018/19 in approving the Strategic Assessment and Control Strategy. It is our work against these priorities as well as the corporate indicators for the service that are set out in the end of year Performance Report that accompanies this report. Elsewhere on this agenda the priorities and work plan for 2019/20 will be considered.
- 3.3 **Personnel:** There are no specific personnel implications from this report. Ensuring that we have a workforce with a range of

skills and abilities and that is flexible enough to meet changing demands is a key priority for both the Joint Management Board and the Service Management Team. The service has undergone a substantial restructuring in April 2019 and details are in the review paper before this Committee today. Needless to say the need to deliver the priorities of the Committee and the Councils that form the PPP featured heavily in the shaping of the new structural arrangements.

3.4 Legal: There are no specific legal implications from this report. The IAA sets out the legal basis for the PPP and the JPPC is responsible for setting strategic direction and overseeing financial and service performance. The production and consideration of this report is a requirement under the IAA

3.5 Risk Management: The main risks for the PPP, in relation to performance, is ensuring resource and finance is distributed appropriately across the partnership areas and in line with the agreed percentages, allowing for natural fluctuations in demand. The ability to manage multiple sites and ICT infrastructure is also under regular review. The PPP maintains both a Strategic and Operational Risk Register. Key areas of concern are reported to the Joint Management Board (JMB) and action plans are in place to limit any risks.

3.6 Property: There are no property implications from this report. It is important to note that the recent service review made clear recommendations on the issue of property which are being considered by the Board. Service effectiveness and efficiency will be at the heart of any accommodation strategy brought forward as will customer focus.

3.7 Other: None

4. Other options considered

4.1 None

5. Executive Summary

- 5.1** This is the second full year performance report for the Public Protection Partnership. It is first to report on the priorities set for the service following consideration of the first service Strategic Assessment and Control Strategy which set out an ambitious strategy for the service resulting in the service working on 57 individual work streams with 87 associated performance indicators and 36 of these being identified as key performance indicators and reported to the JPPC. As the report shows, of these 12 of the KPIs were completed in full and the rest either partially completed, baseline or not started as set out in the exception report contained within the year end performance report. The primary reasons for the areas where targets were not met was vacancies or the need to divert resource into areas of high demand response led work like investigations.
- 5.2** The service continues to face a number of challenges. ICT and accessibility issues (although improving more recently) continue to cause issues for officers operationally and managers for oversight and local information. This has impacted on some teams more than others and is reflected in some of the data within the report. The service however continues to integrate and work is well underway to build the new quality management system and procure a new single case management system. All of this will help with our IAA priority of efficient and improving service delivery.
- 5.3** The Response Team which has been in place since September 2017 has been successful in triaging work and meeting demand. It has at times faced challenges with resource. The recent restructure of the service has added greater clarity and expanded the role of the Response Team. The original response team has also been vertically integrated with Partnership Support (which includes customer services and applications) with a view to enhancing the customer journey. The Service Management Team and the Board are of the view that the customer satisfaction rating set out in the performance report is not reliable and should be discarded. It represents returns of less than 1% of those that have interacted with the service and the Board are urgently looking at new ways of achieving a more representative sample.
- 5.4** This report also sets out additional key data such as the amount of money being recovered for victims of crime, the amount of work handled by the case management unit and some key outcomes from legal actions. We will continue to seek to improve the amount of contextual information and in

the coming months a dialogue will be undertaken with the Members of the Joint Committee about how and what performance information is required from the Board and Service Managers

- 5.5** We have provided a comparison of the areas of demand across the three authorities and it remains in line with the original Inter Authority Agreement. Where there are a limited number of measures where there is any significant difference either between the 3 authorities or compared to previous years. These differences where there is a reduction or increase in demand is reflected across the PPP area and not generally isolated to one authority. Generally though demand and activity appears to remain aligned to the 'agreed percentages' as approved by JPPC in September 2018.

6. Conclusion

- 6.1** The Partnership have built successfully on its first full year in delivering services to our stakeholders at a standard at or above that prior to the partnership being formed.
- 6.2** There continue to be challenges in areas such as shared ICT systems, accommodation and systems more generally. The JMB have developed an action plan to ensure we move forward on these matters.
- 6.3** We have put in place a number of strategic projects within the Strategic Management Team and those responsible will be accountable to the Joint Management Board for delivering these. We have a project approach in place to help deliver the Priorities and Work Plan before the Committee today. It is also anticipated that the new structure aligns significantly better to the model with the alignment of Response with Partnership Support and the development of multi-disciplinary programme grouping.
- 6.4** Communication of our performance in 2018/19 has grown as has the profile of the service. We continue to get significant press coverage as a service and the plans to roll out our new website and develop the social media presence will all help with the delivery of the work plan and improve the customer journey.
- 6.5** To conclude, the service has been effective in delivering for our communities. There is no room for complacency as we move forward we are all too aware of the areas for further improvement. The biggest strength

of the service is the committed, professional and knowledgeable team that work day in and day out to deliver the service.

Appendices

Appendix A – 2018/19 End of Year Performance Outturn Report

PPP Strategic Aims and Priorities Supported:

The proposals will help achieve the following Public Protection Partnership aims as stated in the Inter Authority Agreement:

- 4 – Supporting Prosperity and Economic Growth**
 - 5 – Effective and Improving Service Delivery**
-

Officer details:

Name: Anna Smy

Job Title: Strategic Projects Lead

Tel No: 01635 503257

E-mail Address: anna.smy@westberks.gov.uk

This page is intentionally left blank



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

PERFORMANCE INFORMATION

Summary for Members of the Joint Public Protection Committee

**Quarter 4 2018-19
Year End Outturn**

Table of Contents

1. Summary	3
2. Key Strategic Progress	3
3. Communication and Community projects	4
4. Business plan and Strategic Programme	4
4.1. Strat 1 – Operating Model	4
4.2. Strat 2 Staff Development and Management	4
4.3. Strat 3 ICT Strategy	5
4.4. Strat 4 – Budgets	5
4.5. Strat 5 Cllrs and JMB Relationship	5
4.6. Strat 6 – Charging For Services	5
4.7. Strat 7 – Local Agreements	5
4.8. Strat 8 – Accommodation	5
4.9. Strat 9 – Performance Monitoring	5
4.10. Strat 10 – Working Conditions – Health and Safety	6
4.11. Strat 11 – Primary Authority Partnership (PAP)	6
4.12. Strat 12 – Emergency Planning and Business Continuity	6
4.13. Strat 13 – Quality Framework for PPP	6
5. Inter Authority Agreement – Key Performance Indicators for 18/19	6
5.1 Effective budget management and use of resources	6
5.2 Maintain high levels of customer and business satisfaction	7
6. Service Performance across the Partnership	9
6.1 Measures of Volume and Key Demographics	9
6.2 Core Priority Work	11
7. Service Complaints and Information Requests	15
8. Risk profiles	16
9. Structure chart and functions	19
10. Primary Authority Partnerships (PAPs)	19
11. Contracts with other organisations	19
12. Customer charter / Service commitments	20

1. Summary

This quarter has focussed again on the change to the structure, identifying priorities for 2019/20 and completion of projects within 2018/19. The new Strategic Managers were appointed and their focus has been on identifying the next stages to get the operating model and structure working. This change has meant that some strategic projects have been put on hold until new owners or team are able to take them on. This is also the case for some of the projects linked to the priorities, it has been necessary to determine which may continue and which need to reach project closure as the year ends.

As the service continues to develop and grow we continually look at our performance and how we can improve (we now have an active Improvement Action Log for our Quality Management System).

2. Key Strategic Progress

Finance	<ul style="list-style-type: none">Year-end work commenced to ensure that invoices and purchase orders were completed in a timely manner. End of year outturn £2K overspend.
HR	<ul style="list-style-type: none">The restructure process was completed in Q4 and new Strategic Managers appointed (see attached top level structure chart Appendix D)
ICT	<ul style="list-style-type: none">Procurement commenced for a single case management data base for the service.A meeting was held with IT representatives from all 3 Local Authorities present to progress some short term gainsReview of the IT provision was undertaken to better inform the PPP ICT Strategy
Property	<ul style="list-style-type: none">It was agreed that permanent Planning Permission for Theale be sought to ensure continuity when temporary permission expires, this is alongside the overall accommodation strategy.
Legal	<ul style="list-style-type: none">Due to loss of key personnel the Case Management Unit have incurred delays in progressing some cases, priority has been for cases which meet the PPP priorities.Recruitment now underway and it is anticipated the team will be at full strength again by August 2019.
Performance and Service Development	<ul style="list-style-type: none">Work is needed with new Members to better develop their Key Performance IndicatorsWe have, where possible tried to link in with the KPI setting for the individual authorities
Business Development	<ul style="list-style-type: none">We were unsuccessful in our bid for the Management of Letting Agents at a National level, we were in the last 3 shortlisted and our bid was well received.We continue to seek opportunities with partner authorities and for external funding to support projects and investigations
Risk (Emergency Planning and Business Continuity)	<ul style="list-style-type: none">Work continues on developing the Business Continuity Plan

3. Communication and Community projects

- The service has issued 8 press releases in quarter 4 and has received 18 direct media inquiries, these have resulted in 27 mentions in the press. Whilst these are lower than previous quarters they are higher than Q4 for 2017/18

Service Area	Q4 data				Year Total
	Internet	Print	Radio	TV	
Generic PPP		3			6
Commercial					5
Environmental Quality		1			10
Licensing	3	5			51
Partnership Support					3
Residential	2	1			9
Response	2				4
Trading Standards	5	3	1		35
Trading Standards/PPP Case Management Unit		1			18
Year Total					147

Table 1: number of media interactions based on subject area and media type.

4. Business plan and Strategic Programme

During Q4 the Joint Management Board developed their action plan. The Strategic Managers held regular meetings to manage the transition to the new structure and a Change Management Team was set up to support colleagues and act as a focus for questions and queries. As part of the process of effecting change in the service they have taken on some areas of the strategic programme within an agreed action plan which will form part of this report in the future.

4.1. Strat 1 – Operating Model

- Teams have continued to operate projects in line with or aligned to the work plans agreed previously. The status of these projects are reported monthly to the Joint Management Board and they are able to review any red risks and consider new projects.
- The review has looked at how the structure and workflow can be improved to help better mobilise the model. This will start to take effect in Q4 with the new structure in place for 1st April 2019.

4.2. Strat 2 Staff Development and Management

- No appraisals were carried out in Q4, probationary meetings, 1:1's and other performance meetings were carried out as appropriate.
- A skills audit for the service was sent to all staff, this will form the basis of discussions with managers and be a key part of the development of the staff within the PPP and encourage the opportunities for development and increased resilience in key areas.
- Through the change management group a number of questions around personal development were posed and taken into consideration when determining the placing of

staff within the new structure. A number of new posts have been identified within the restructure process which will provide opportunities.

- Training courses were attended on a wide range of subjects.

4.3. Strat 3 ICT Strategy

- The draft strategy has been prepared, however there needs to be more strategic ICT input from the partner authorities before a decision can be made around the overall strategic direction of the PPP.
- Work on the procurement of the single system was stopped to enable further market testing.

4.4. Strat 4 – Budgets

- There continues to be monthly meetings with the West Berkshire accountant.
- 2018/19 outturn was a £2K overspend.
- Licensing income was again challenging in 2018/19

4.5. Strat 5 Cllrs and JMB Relationship

- The officer acting up as Principal for Licensing Governance has developed well and all reports to the various licensing committees are being taken to the Joint Management Board for consideration in line with all other reports.
- We have set up processes for dealing with corporate issues such as Freedom of Information requests alongside Councillor complaints.

4.6. Strat 6 – Charging For Services

- No progress in Q4 on this other than links with Fees and Charges work.

4.7. Strat 7 – Local Agreements

- This area has not progressed. Existing agreements have been consolidated.

4.8. Strat 8 – Accommodation

- Within the Joint Management Board action plan accommodation is one of the areas for progression.
- It has been necessary to raise a number of IT related issues with regards to the Theale Hub. We are working with West Berkshire IT and will look to progress some of these once the overall strategy is confirmed.

4.9. Strat 9 – Performance Monitoring

- We now have a working performance framework capturing Measures of Volume, Performance indicators (including the range of where and to who these are reported) and

project management RAG status reporting. These are reported to Joint Management Board monthly and are available at any time.

- The new structure will help focus KPI's on the priorities with other indicators being more about the process and not outcomes.

4.10. **Strat 10 – Working Conditions – Health and Safety**

- Paul Anstey is leading the West Berkshire Health and Safety review of his service (which includes the PPP). This is progressing and once processes are agreed they will sit within the service quality management system.
- No suitable replacement lone working system has been established as a replacement for our existing provider. An interim measure will be in place until West Berkshire corporate system in place.

4.11. **Strat 11 – Primary Authority Partnership (PAP)**

- No changes in PAP status, Invoices for work in 19/20 have been sent to the companies.

4.12. **Strat 12 – Emergency Planning and Business Continuity**

- This is under review following the restructure.

4.13. **Strat 13 – Quality Framework for PPP**

- Work continues in this area and an updated Project Plan is attached as Appendix C

5. **Inter Authority Agreement – Key Performance Indicators for 18/19**

- The key performance indicators identified to monitor outcomes of the control strategy are detailed within 6.2 Core Priority Work.
- At the Joint Public Protection Committee in September 2018 it was resolved to remove a number of the KPIs set out within the IAA and retain the following:

- Effective budget management and use of resources
- Maintain high levels of customer and business satisfaction

5.1 **Effective budget management and use of resources**

- By using Project Methodology and the National Intelligence Model the Strategic Tasking Group and Joint Management Board have the ability to scrutinise resources to ensure the delivery is in the highest priority areas.
- We have introduced a KPI around income and expenditure

<u>1819-075</u>	Quarter 4
Management of budget to within 1% of baseline	Budget outturn £2K overspend

1819-076	Quarter 4
Management of income to within 5% of budget	Achieved

- Budget management remains difficult. Income has fallen short of budgeted expectation. This was mitigated in 2018/19 by better than anticipated income levels from HMO licensing as well as grant support for larger investigations
- The mitigations in place include balancing budgets from vacancy savings and review of all discretionary fees and charges focussing on full cost recovery.
- Outturn was within 0.5% of net budget

5.2 Maintain high levels of customer and business satisfaction

- The monthly customer satisfaction responses show an inconsistency in the response, the trend of improvement would have been shown during Q4 however there was an unusually poor response in February. This has been analysed and there is no obvious reason for this such as a particular member of staff or process.
- The overall percentage figure remains a Key Performance indicator and it has been disappointing to see the lower figures, this is skewed by the low response rates which continue, we are reviewing customer journey which will identify where some of the negative experiences have come from.
- In contrast to the formal feedback route we continue to receive positive responses directly to the officers and these show personal experiences of how the PPP had made a significant positive impact:

“Thank you from the bottom of my heart for your participation in this very happy conclusion to this very stressful situation. I wish you and your colleagues many happy conclusions this year you all do an amazing job.”

“When you first came I thought ‘what a cheek’. By the time you had finished I though what a great service and you managed to get me refunded the £99.99 even before you had left Thank you.”

“I popped in last week and was delighted to see there were no electrical goods on sale and 2 prominent notices warning staff not to sell untested electrical goods. Well done and thank you for taking my report seriously. Excellent result, thank you.

“Thanks again for your comprehensive talk helping us (and friends and family) not to be scammed and for raising our awareness of the vulnerability of people in the community to this form of crime. You are clearly a busy man doing a very worthwhile job.”

” Just a quick note to thank you again for your help with this. As a result of your email, Groundsure have revised the report to a “pass” which we are delighted with. We have also had a very reasonable quote for indemnity insurance (£170 for 25 year transferrable cover on £217,500), despite being told we would not get insurance if we have spoken to yourselves! All in all, very happy all round and we can proceed with the sale”

“My Mother was withdrawn from the family being horrid to the point my husband and her grandchildren would no longer visit. When I visited she talked constantly about wishing she was with my dad who recently passed. After your visit and installing the call blocker and your visits over the following month she is now back playing bowls which she played with my dad and has even invited us over for dinner the relationship between my husband and grandchildren has improved. Thank you”

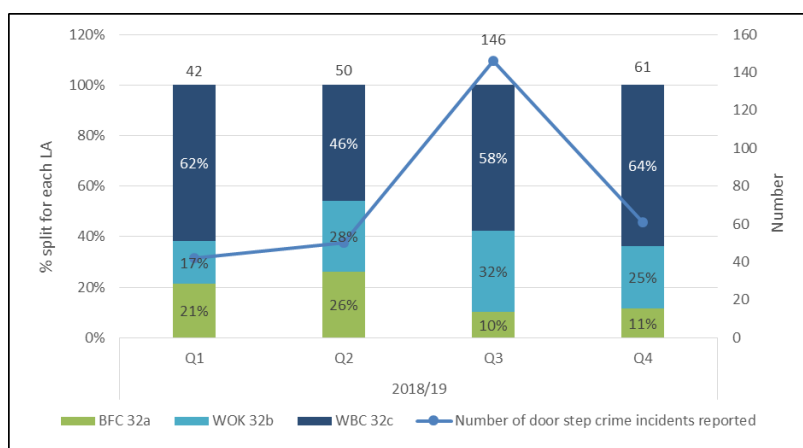
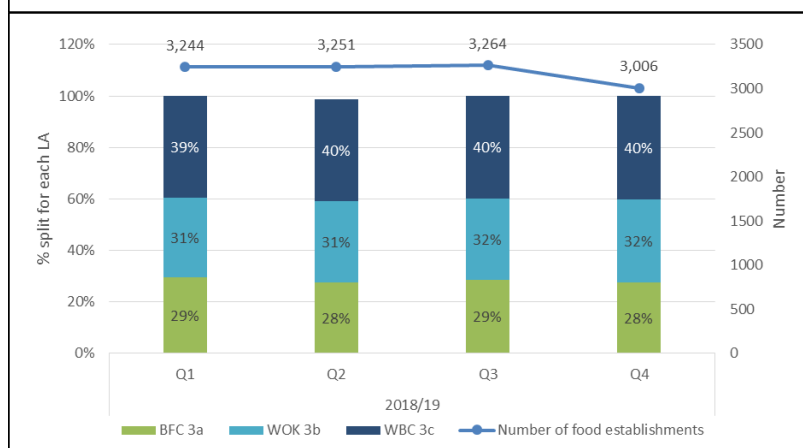
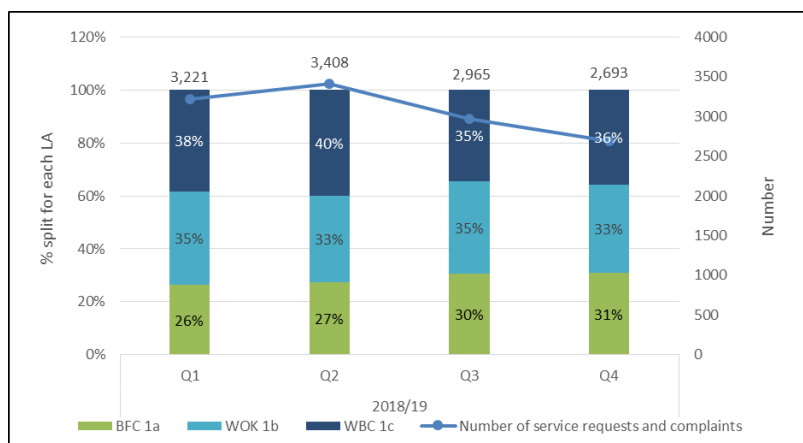
- We have a process in place for following up on particularly poor responses and also ensure service improvements are actioned (when appropriate), this is a key area of the Quality Management System and amendments should be noted in the Improvement Action Logs.

1819-060 Customer Satisfaction	2018/19 Annual Percentage
80% of service users satisfied with Public Protection Partnership	66%
The evaluation of this demonstrates that a particularly low response rate has ultimately made this a very unreliable source of information. We received over 12,000 requests for service and the response rate was less than 1% . The Joint Management Team are working on ways to improve this position and this includes an online survey platform.	

6. Service Performance across the Partnership

6.1 Measures of Volume and Key Demographics

- Quarter 4 data is now populated and we can start to identify indicators of trends and going forward we can start to identify resource issues, potential impacts on the service, better inform our strategies. We can also look at the year on year data.



No of Service Requests and Complaints

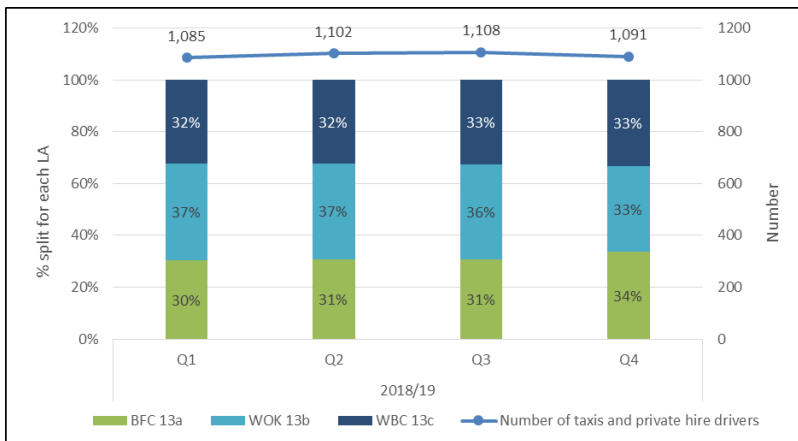
- The overall number of service requests received in Q4 continued dropped across all 3 authorities. We have also improved system auditing to reduce duplications in the system, we have set up training and better working relationships with the Customer Care teams at each authority.

No of Food Establishments

- The number of food establishment has increased in West Berkshire and Wokingham by a small amount (there was a drop of 3 within Bracknell) and remains a useful tool for predicting future impact on resources. Indicators such as undertaking inspections of all new premises within 28 days of opening can be affected when there are sudden increases.

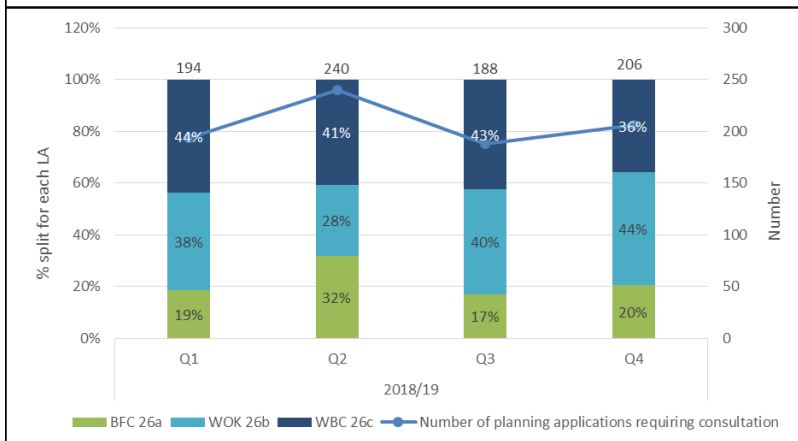
No of Doorstep Crime Incidents reported

- Note that the peak in Q3 was due to corrections of Q1 & 2. Q4 reporting was The focus on this priority area has shown a massive 382% increase from 62 reported 17/18 to 299 in 2018/19.



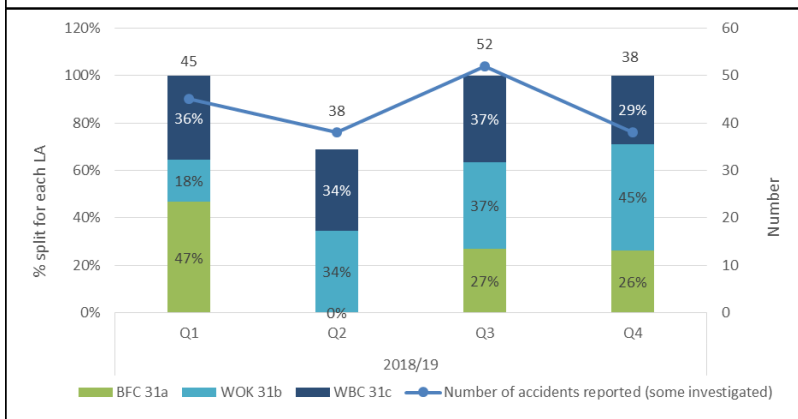
No of Taxis and Private Hire drivers

- This measure can help identify the effectiveness of campaigns and interventions. We receive reports from a number of sources and we can obtain large amounts of intelligence



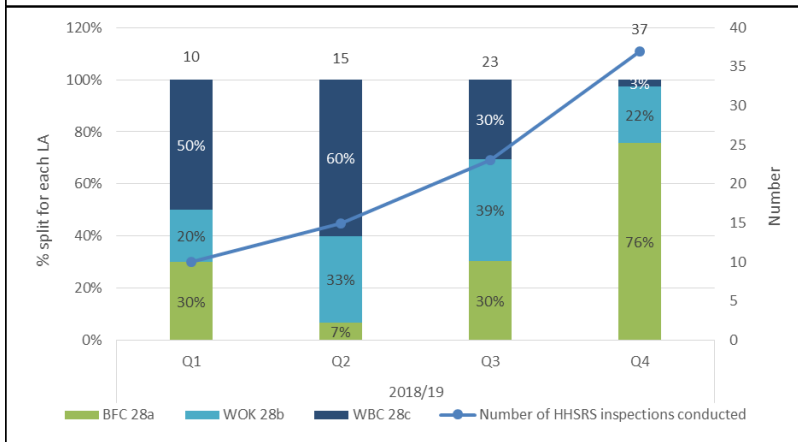
No of Planning applications requiring PPP input into consultation

- The increase in Wokingham applications (44%) coincides with an increase in more complex SDL and Town Centre Regeneration condition discharge applications and reserved matters applications for new roads and various SDL phases. Apart from an increase in Bracknell in Q2 the proportion in Bracknell remains fairly static



No of accidents reported (some investigated)

- We have seen an increase in the number of reports in Q3, we will analyse these and see if they are associated with particular types such as overstocking for Christmas and identify any future project areas we may wish to focus on.



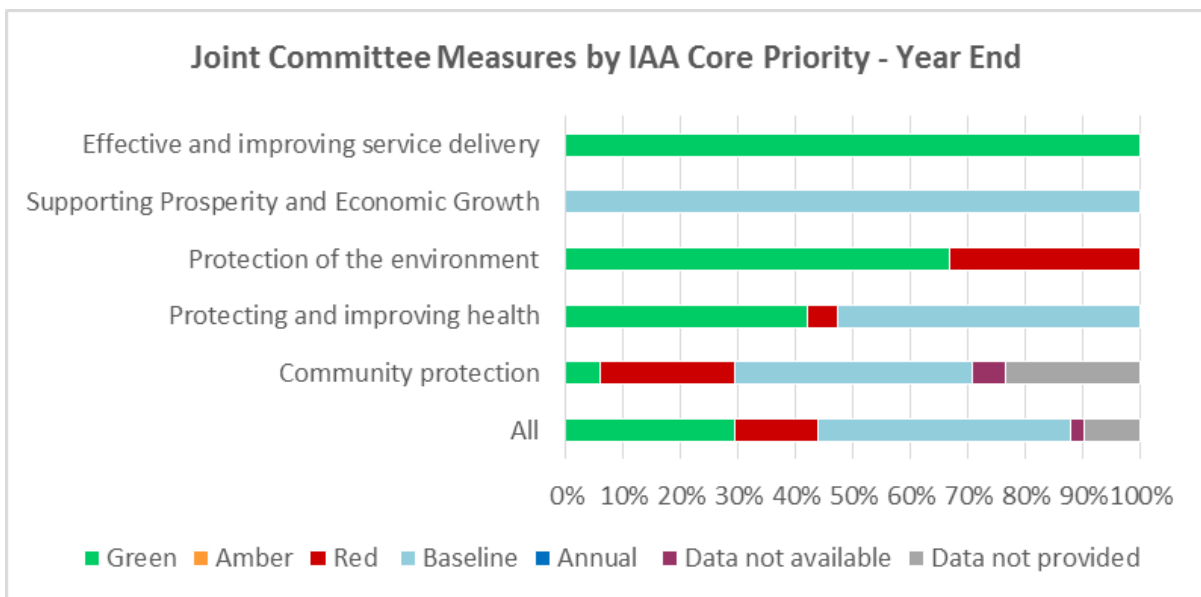
No of HHSRS inspections conducted

- We have seen an increase in the number of full Housing Health and Safety Rating System inspections as a result of increased demand through the changes to the HMO Licensing regime; we have also improved on officer monitoring to ensure accurate record keeping

6.2 Core Priority Work

- Key projects continue in quarter 4 with some new or delayed projects starting. There are currently 87 KPI's for the PPP as a whole (many are subdivided across the 3 areas to assist with any trend analysis). Completed projects include:
 - Air Quality Action Plans
 - Licensed Caravan Sites
 - Doorstep Crime
 - Counterfeit goods sold online
 - 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

- A summary of these are included in the table below.



- There are a number which are being reported as red, some of these are back on track but will not meet the target at year end.

- As we are moving to monitoring the outcomes and impacts of our activities and away from simply % of X inspected we have a larger number of baseline indicators. In 2019/20 we will be seeing more indicators with commentaries and be better placed to show the difference we make to the wider community.

- The following projects are those ending the year as a Red risk. Some of these were identified earlier in the year such as work on Planning Applications and mitigation was in place to deal with these, however they remain a Red risk. They have been reported to the Joint Management Board, along with other areas of red risk in projects and pieces of work only reported directly to the Board.

Measure Title	Ref.	Team Manager	Target	Q1 RAG/ Outturn	Q2 (YTD) RAG/ Outturn	Q3 (YTD) RAG/ Outturn	Q4 (YE) RAG / Outturn	Comment
Priority: Protection of the Environment % of planning consultations responded to within the local planning authority's timescales	1819-007	Joe Dray	90%	◆ 84.5%	■ 75.4%	■ 80.2%	■ 80.8%	Not achieved across 3 authorities in Q4 due to other demands on our time, end of year annual leave and absence. Additional work from PPC inspections also had impact.
Priority: Community Protection Number of multi-agency school vehicles checked (2 per LA)	1819-021	Julia O'Brien	6	★ 2	★ 3	★ 4	■ 5	2 checks completed in West Berks and Bracknell. Only 1 in Wokingham.
Priority: Community Protection % of multi-agency scrap metal checks carried out (1 per year)	1819-032	Julia O'Brien	75%	★ .0%	★ .0%	◆ 26.3%	■ 52.6%	Resource issues which included long term absence of key staff
Priority: Community Protection % of Private Hire operators inspected (2x per year)	1819-023	Julia O'Brien	100%	◆ .7%	■ 13.1%	■ 26.7%	⌚	Resource issues which included long term absence of key staff
Priority: Community Protection % of premises that have applied for a designated premise supervisor (DPS) variation vested within 28 days of application	1819-024	Julia O'Brien	75%	◆ 7.2%	◆ 7%	■ 9.6%	■ 8.5%	YTD: 22 / 260 Lack of resource and other priority work.

<p><u>Priority: Supporting Prosperity and Economic Growth</u> Produce and circulate newsletters to licencees and members of the taxi trade</p>	1819-033	Julia O'Brien	2	◆ 0	◆ 0	★ 0	■	Delayed	Newsletters drafted and awaiting final sign off and circulation. delivered early Q1 2019/20
<p><u>Priority: Protecting and Improving Health</u> Number of car dealers visited to check the validity of information supplied (car history / warranties etc.) to customers during 2018/19</p>	1819-056	John Nash	20	★ 3	★ 13	■ 13	■	13	Resource issues which included long term absence of key staff and long term investigation work.

Other Key Performance Indicators are highlighted below which demonstrate where the service is focussing on the priorities of the service and the areas of:

- Community Protection
- Protecting and improving health
- Protection of the environment
- Supporting prosperity and economic growth
- Effective and improving service delivery

<u>1819-080 Door step crime and mass marketing</u>	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Year End
Amount of money recovered/saved and loss prevention through intervention by PPP Trading Standards activities (snapshot figure)	£39,816	£65,537 Direct advice with a local business prevented a scam pay-out of £39,487	£58,185	£57,850	£216,153
It should be noted that as individual Council services, pre PPP, it was not possible to collate this information and demonstrate the impact on people's finances.					
<u>1819-27 Legal Actions</u>	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Year End
Number of PPP Non RTA legal actions concluded	4	3	5	5	17
Number of PPP RTA Legal Actions Completed	Annual	Annual	Annual	Annual	51
Number of Legal Actions for OCC/RBFRS Completed	Annual	Annual	Annual	Annual	44
Total Number of years Custodial Sentences (Including Suspended) * see below	Annual	Annual	Annual	Annual	11.5 Years (26 months)

<u>1819-081 Legal Actions</u>	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Year End
Amount of money reclaimed through Proceeds of Crime Act orders	27.7K	0	18.3K	5K	£51K
<u>1819-018 Environmental Nuisance</u>	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Year End
% of events on the annual event monitoring plan attended	12/12 - 100%	5/5 - 100%	Monitoring programme completed during Q2. Planning for 19/20 events		100%
<u>1819-037 Food Safety at businesses premises and in the home</u>	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Year End
75% of poorly performing premises (rated 0 or 1 on the Food Hygiene Rating Scheme) that meet satisfactory compliance by their next full inspection. Showing improvement in practices to protect residents	This figure will be reported annually to account for the extended timescales for inspections. It will track progress of those premises rated zero and one at the start of the inspection year.				91.7%
<u>1819-037 Food Safety at businesses premises and in the home</u>	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Year End
% of premises required to make improvements following a food inspection visit (baseline)	165/270 61.1%	211/324 65.1%%	173/290 59.7%	222/397 55.9%	60.2% Baseline report
<u>1819-056 Car Sales interventions</u>	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Year End
Number of car dealers visited to check the validity of information supplied (car history / warranties etc.) to customers during 2018/19	Project starts Q2	13 inspected to date (1/3 of traders)	0 Inspections - Project timetable has been extended by 6 months	0	13 out of target 20
<u>1819-025 Community Protection</u>	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Year End
% of premises that meet satisfactory compliance following a licence inspection. (Baseline)	87.2%	94.7%	66.7%	92%	80.5% Baseline report
CP 1 - Doorstep Crime interventions					Year End
Total amount of financial detriment					£50,295
Number of incidents					299
Interventions with offender at premises (rapid response incidents)					39
Number of routine patrols					10

Custodial Sentences:

Bracknell - Doorstep Crime - 2 x **Bracknell** Victims and 1 x Kingston Victim – Fraud – Total Value approximately £380K – 4.5 years imprisonment.

Bracknell Car Dealer – Unfair Trading and Fraud – Three years custodial sentence (reduced to 2 on Appeal)

West Berkshire Based Car Dealer – sentenced to four years imprisonment for five offences of fraud by false representation and 5 offences of possession of articles for use in a fraud

West Berkshire Based Driving Licence Website Business – sentenced to 9 months suspended sentence for unfair trading - £75,000 costs award

Wokingham Borough / Somerset Based Counterfeit goods sellers – conspiracy to breach the Trade Marks Act 1 x 16 month custodial (suspended), 1 x 9 months (suspended)

West Berkshire Based Counterfeit goods sellers – offences contrary to the Trademarks Act 8 weeks custodial (suspended)



7. Service Complaints and Information Requests

- The relevant areas of the Quality Management procedures are developed across the PPP to provide improved consistency.
- There continues to be no differentiation where the Councillor is making a general enquiry as opposed to a formal complaint. We will look at how we can best capture this moving into 2019/20. This is linked to the strategic projects around the JMB and Councillors relationship.
- Nearly 10 FoI requests as a service in a week.

Authority	Quarter 4				Year End Total			
	Cllr	MP	FOI	Other	Cllr	MP	FOI	Other
Bracknell Forest	6	0	52		34	0	175	
West Berkshire	5	1	60		22	2	95	
Wokingham	7	0	16		20	1	246	

8. Risk profiles

- The operational and strategic risk register is maintained regularly and reported to the Joint Management Board at each meeting. This has been translated into the table below.

	<u>Extreme Impact – Unlikely</u>	<u>Extreme Impact – May occur</u>	<u>Extreme Impact – Likely</u>	<u>Extreme Impact - Certain</u>
Level of impact 	<u>Major Impact – Unlikely</u> <ul style="list-style-type: none"> Failure to deliver responsibilities as ‘Food Authority’ Failure to deliver responsibilities as ‘Health and Safety Authority’ Inability to adapt to a change in legislation Action taken by the Local Government Ombudsman for failing to deal with a complaint effectively Resources unavailable to maintain technical competency Civil claim against the service for professional negligence Failure to deliver responsibilities as the ‘Licensing Authority’ Data security incident Evidence compromised Inability to conduct secure interviews under caution 	<u>Major Impact – May occur</u> <ul style="list-style-type: none"> Unavailability of technically competent staff Deficient professional oversight of criminal investigation Action taken by the Information Commissioner for failing to deal with and FoI or GDPR request Failed performance indicators Case Management system failure Poor customer satisfaction Low staff levels 	<u>Major Impact – Likely</u> <ul style="list-style-type: none"> Low staff morale Reportable accident at work 	<u>Major Impact - Certain</u>
	<u>Significant Impact – Unlikely</u> <ul style="list-style-type: none"> Disagreement over policy direction Overspent budget Failure to deliver responsibilities as the ‘Gambling Authority’ 	<u>Significant Impact – May occur</u> <ul style="list-style-type: none"> Reduced Income 	<u>Significant Impact – Likely</u>	<u>Significant Impact – Certain</u>
	Minor Impact - Unlikely	Minor Impact – May occur	Minor Impact - Likely	Minor Impact - Certain
		Likelihood 		

Red Risk Action Plans

- Where red risks have been identified plans are in place, this is an example of the types of actions which are being taken.

Low Staff Levels

- This has moved to an amber rating of major impact (may occur) as we have successfully recruited to a number of posts and enabled acting up in others to ensure resources have not been lost from the service. There is still a demand from Team Managers for more resource but work needs to focus now on ensuring the right resources and personal development and improving the skill set of the service.

Low Staff Morale

Action	Date (2018/19)	R/A/G status	Q1 Previous Comment	Q2 Previous Comment	Comment
Review of service by external organisation (to identify solutions to making further improvements)	July-Oct	G		Report to JMB on 19 th October – on track.	Review completed and proposals presented to the board
Mixed staff workshops planned for development of strategic assessment (19/20)	September	R	Project plan needed and meetings still to be booked	Sessions deferred to November 2018	These are now booked in Jan/Feb due to consultation process
Mixed teams for Website development	July	G		Team working well together and on target to deliver	Continues to meet to deliver website (currently being edited)
Internal review of response team and relationships with operational teams	September	G	Process in development but not ready	Seconded Principal EHO to team has worked well in developing workable solutions with the other teams	Relationships continue to develop. Other acting up roles have helped show progression opportunities in the service
Building relationships within each authority by attending Management Team meetings	On-going	G		Continues to work well and internal relationships/visibility improving	As previously these have continued and help with visibility
Newsflash – staff newsletter to share more positive feedback from customers	On-going	G		JPPC and JMB members now receiving Newsflash	

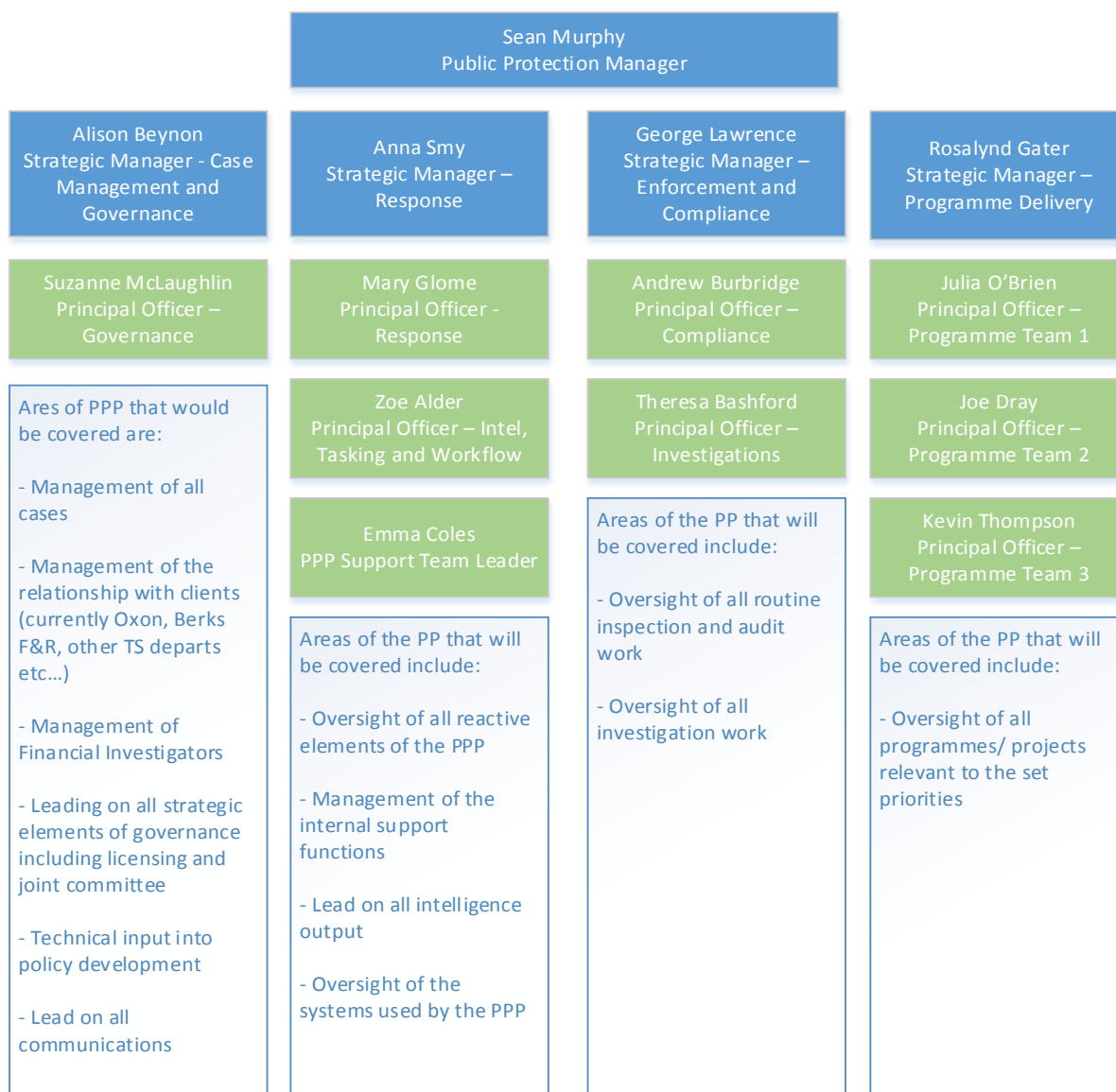
This action plan will be re-evaluated in Q1 2019/20 and staff will be engaged via survey to determine if sufficient improvement has been made.

Reportable Accident at Work

Action	Date	R/A/G status	Q1 Previous Comment	Q2 Previous Comment	Comment
Update of all contact details	August	G			Included in overall review and Business Continuity work
Procedure for updates and changes	On-going	G			
Review of Health and Safety processes at all buildings PPP operate from	September	A	Accommodation changes impacting on delivery	Information flow for some buildings still an issue	Number of meetings and site visits undertaken
Responsible Person for buildings appointed	September	A			

This is part of a wider review being undertaken by the host employer, West Berkshire, which includes an update of all risk assessments and safe systems of work.

9. Structure chart and functions



10. Primary Authority Partnerships (PAPs)

- There were no new PAP’s in Q4 and no PAP’s ceased arrangements.

11. Contracts with other organisations

- There have been no changes in quarter 4 and work for other agencies continues and is monitored in line with resource needs across the PPP.
- Work on the BID for Letting Agents contract in December 2019 – unfortunately this was not successful. It does provide a useful template for similar bids going forward.

12. Customer charter / Service commitments

- Nothing further to report from Quarter 4.

This page is intentionally left blank

Public Protection Partnership - Service Review

Committee considering report:	Joint Public Protection Committee
Date of Committee:	11 th June 2019
Report Author:	Sean Murphy

1. Purpose of the Report

- 1.1 To inform the Committee of the outcome of the review of the Public Protection Service and to update on the progress on implementation and seek approval for operational delegations relating to the new structure.

2. Recommendations

- 2.1 The Committee NOTES the outcomes of the review and the progress made on the implementation of the new structure.
- 2.2 The Committee delegates to the Joint Management Board the authority to implement the outcomes of the review subject to regular updates to this Committee.
- 2.3 The Committee approves the Operational Delegations at Appendix C to this report.
- 2.4 The Committee nominates Alison Beynon, Strategic Manager – Case Management and Governance as an Alternate Director to represent all partner authorities on the Board of Trading Standards South East Ltd

3. Implications

- 3.1 **Financial:** At the meeting in September 2018 the Committee considered and approved its recommended budget for 2019/20. The approved budget included a real terms reduction of £145K per annum to be distributed between the authorities in accordance with the agreed percentages. It is proposed that this saving will be found as a result of the service specific structural proposals set out in this report.

The costs associated with the redundancies have been notified to the partners and will be shared in accordance with the agreed percentages. Appropriate allocations have been made.

The other aspect of this report from which there are financial implications is the proposal to introduce and

implement a single ICT system for PPP. This matter has been considered by Joint Management Board and the Capital (approx. £50K) has been sought from the Councils in accordance with the agreed percentages.

- 3.2 Policy:** The Inter-Authority Agreement (IAA) places a responsibility on the Joint Public Protection Committee (JPPC) to determine service policies and priorities, budgets and finance and also to maintain oversight of performance and service delivery. The matters set out in this report have implications on service structure and delivery.
- 3.3 Personnel:** The structural re-organisation was conducted in accordance with West Berkshire Council's organisational change management policies. All staff and trade unions were consulted as required and a full response provided to that consultation. The re-structure resulted in two redundancies neither of which were compulsory. Two further vacant posts were deleted.
- 3.4 Legal:** The IAA sets out the legal basis for the Public Protection Partnership. The JPPC is responsible for setting strategic direction and overseeing financial and service delivery and performance. The decisions around costs associated with structural change were required to be approved by West Berkshire Council's Executive and were the subject of a Part 2 Report to the Executive on the 14th February 2019.
- The IAA specifically deals with the issue of redundancies arising from service restructure. These are set out above. The IAA delegates the operational delivery of the service to the West Berkshire Head of Service (as host) and the Public Protection Manager. Apart from broad delegations it does not go into detail.
- Legal advice has been sought from external specialists on the issue of delegations. The advice we received was that although it is not essential (as the agreement and the resolutions that put it into force delegate everything to the West Berkshire Head of Service and relevant service managers) it may provide clarity to have a PPP specific scheme.
- 3.5 Risk Management:** All of these matters appear on the main PPP Strategic Risk Register that appears elsewhere on this agenda. A specific risk register will be set up as part of the implementation process of the recommendations of the review.

3.6 Property: Accommodation featured in the review. It is not believed to be a priority in the same way the ICT and structure were identified. The key findings on accommodation can be found in this report.

3.7 Equalities: See Appendix A

4. Other options considered

4.1 A number of options around structure were considered in the review. These included geographical splits, functional structures and a structure based around key priorities. In the end it was the model recommended and subsequently considered most appropriate by the Board was a hybrid model detailed in this report.

5. Executive Summary

- 5.1** The Public Protection Service has been in place for 26 months. In the summer of 2018 the Joint Management Board commissioned a review of the service concentrating on a number of key areas. These included amongst other things ICT, accommodation, governance, communication and structure.
- 5.2** The review was in two parts. In the first part the review considered key documents, policies, procedures and examined in detail the delivery model and the structure. In part two the findings of the West Berkshire Employee Attitude Survey were considered along with a detailed PPP staff survey and a series of focussed discussions involving over 30 staff, Board Members and Committee Members.
- 5.3** The review reported in the Autumn of 2018. The overall picture from the review was that the service had delivered to a high standard however there were areas such as ICT and systems that had caused significant challenges to the operational delivery of the service and these had impacted on staff morale. The governance arrangements were considered to be appropriate and fit for purpose.
- 5.4** One section of the review dealt specifically with the issue of organisational structural arrangements. The conclusions of this was the current structure was not a good fit with the model (National Intelligence Model) previously agreed by the Committee in that it brought aspects of the model such as response, tasking and intelligence into a structure that was built largely around functional lines such as Trading Standards, Commercial, Residential, Licensing etc. The other matter that was also looked at were the number of reports for the PPP aspect of the Public Protection Manager role. Previously this stood at nine as one PP Manager post has been vacant for over 12 months although a secondment to Strategic Project Lead is currently in place to support the PP Manager and Board.
- 5.5** In essence the proposal was to keep the model and build a structure around four teams namely: Case Management and Governance, Response, Enforcement and Compliance and Programme Delivery.
- 5.6** The proposal reduced the number of managers and Public Protection Manager posts from two to one and the number of second tier PPP reports from nine to four. The new structure is set out at Appendix B to this report.
- 5.7** The existing Inter-Authority Agreement delegates the operational management of the service to the West Berkshire Head of Service (currently Head of Public Protection and Culture) and Public Protection Manager(s) of which there was formally two but now only one. **Appendix C** to this report gives a proposed breakdown of Operational Delegations building on the new structural arrangements and the Committee is asked to approve this schedule of delegations.

- 5.8** The restructure has also led to the need to appoint an Alternate Director to sit on the Board of Trading Standards South East Ltd in the event that the main Director (currently Sean Murphy, Public Protection Manager) cannot attend Board. It is proposed that this role should be occupied by xx who is a Strategic Manager in the new structure.

6. Conclusion

6.1 The review concluded that:

- The governance arrangements are fit for purpose. The Service Manager should report to the Board and not be part of it. In reality this is how things have worked for some time.
- There is no reason why the delivery model in general terms should not work and much progress has been made on this. Greater clarity would be provided by updating and developing policies and procedures, staff training and a more appropriate ICT system.
- External communication has been a significant success for the service and aspects of internal communication such as Newsflash have worked well. More needs to be done to overcome the challenges of internal communication resulting from staff working across four offices and multiple teams. An internal communications group will be set up in January to look at these issues.
- The ICT situation has significantly hampered the service. Staff are working across three networks, on three sets of hardware and on three databases (none of which were built to support the delivery model). A whole service ICT strategy needs to be developed removing the reliance on individual council ICT systems. To this end it was noted that a cloud based system is currently being procured but that progress needs to be maintained.
- Accommodation is an issue but not as significant issue as structure and ICT. The key issue that the progress to a 'head office' for PPP needs to be progressed. An accommodation strategy will be fully worked up and brought back to Committee for consideration.
- The original structure whilst implemented for the right reasons needed to be reviewed. As a result the move to the structure set out Appendix B to this Report was implemented in accordance with West Berkshire Councils structural change management policies.

- 6.2** The Committee is invited to note the findings of the review and to delegate the remaining aspects of implementation to the Joint Management Board. The Committee is also invited to approve the Operational Delegations set out at Appendix C and to nominate Alison Beynon as an Alternate Director to the Board of Trading Standards South East Ltd.

Appendices

Appendix A – Equalities Impact Assessment
Appendix B – New Structural Arrangements
Appendix C – Operational Delegations

PPP Strategic Aims and Priorities Supported:

The proposals will help achieve the following Public Protection Partnership aims as stated in the Inter Authority Agreement:

- 4 – Supporting Prosperity and Economic Growth**
 - 5 – Effective and Improving Service Delivery**
-

Officer details:

Name: Sean Murphy

Job Title: Public Protection Manager

Tel No: 01635 519930

E-mail Address: sean.murphy@westberks.gov.uk

Appendix A: Equality Impact Assessment – Stage One

What is the proposed decision that you are asking the Committee to make:	To consider the outcomes of the Review of the Public Protection Service and delegate implementation of the recommendations to the JMB
Summary of relevant legislation:	
Does the proposed decision conflict with any of the partnerships key objectives?	No
Name of assessor:	Sean Murphy
Date of assessment:	02/06/2019

Is this a:		Is this:	
Policy		New or proposed	
Strategy		Already exists and is being reviewed	X
Function		Is changing	X
Service			

1. What are the main aims, objectives and intended outcomes of the proposed decision and who is likely to benefit from it?	
Aims:	To set out the findings of the Review of the Public Protection Service
Objectives:	To inform Members of the outcomes of the review and to seek delegation to the Joint Management Board to implement the recommendations arising from the findings.
Outcomes:	Implementation of the recommendations including structural arrangements.
Benefits:	The delivery of the key PPP priorities of: Improving and efficient service delivery

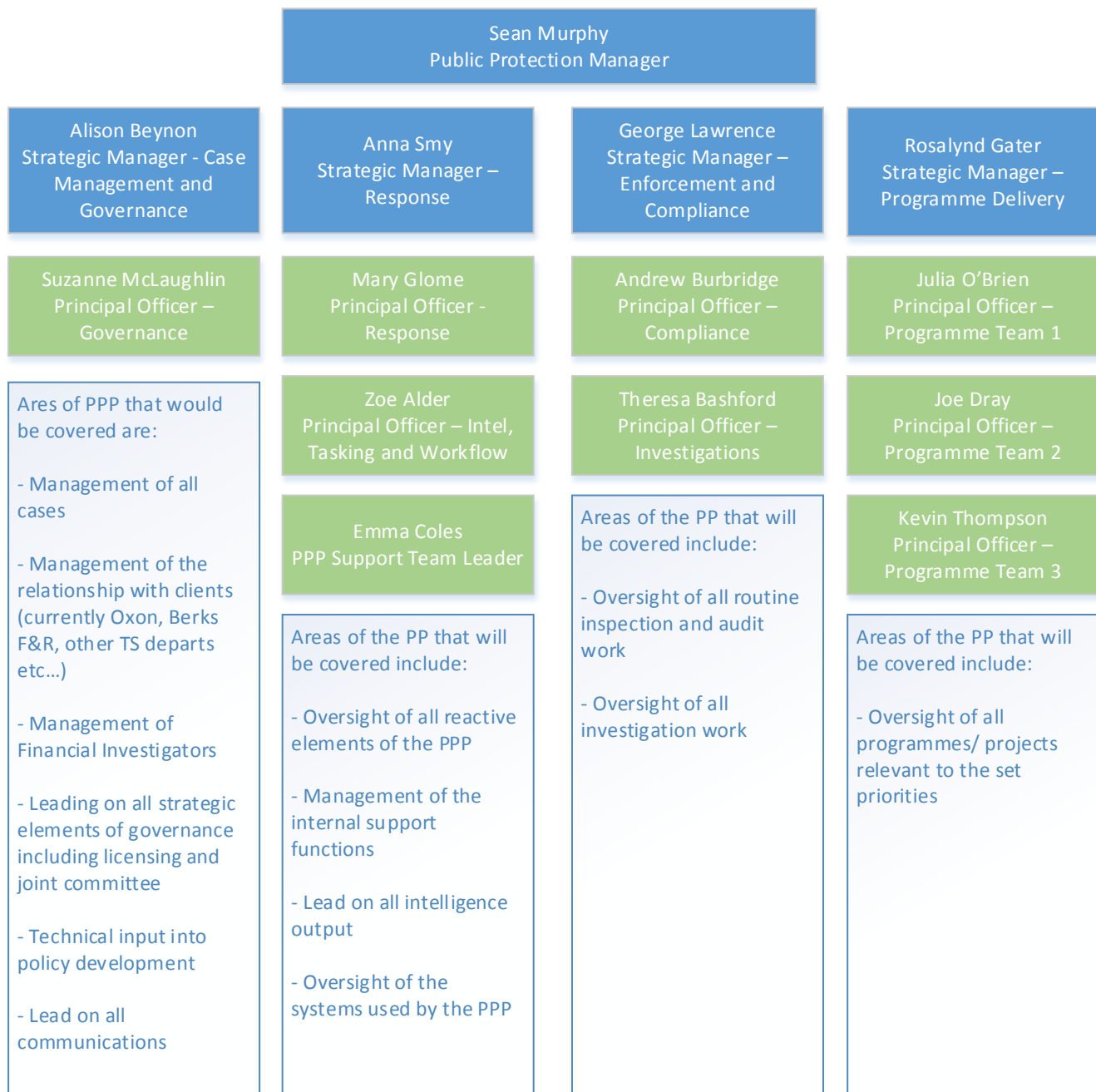
2. Note which groups may be affected by the proposed decision. Consider how they may be affected, whether it is positively or negatively and what sources of information have been used to determine this.		
(Please demonstrate consideration of all strands – Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation.)		
Group Affected	What might be the effect?	Information to support this
Age	Redundancy	See Report
Disability	Redundancy	See Report
Gender Reassignment	Redundancy	See Report
Marriage and Civil Partnership	Redundancy	See Report

Pregnancy and Maternity	Redundancy	See Report
Race	Redundancy	See Report
Religion or Belief	Redundancy	See Report
Sex	Redundancy	See Report
Sexual Orientation	Redundancy	See Report
Further Comments relating to the item:		
In terms of the restructure there will be implications for individuals. These however will be managed through the Organisational Change Management and HR policies of the Host Authority (West Berkshire)		

3. Result	
Are there any aspects of the proposed decision, including how it is delivered or accessed, that could contribute to inequality?	No
Please provide an explanation for your answer: The premises are accessibility compliant.	
Will the proposed decision have an adverse impact upon the lives of people, including employees and service users?	Yes
See comments in 2 above.	

Appendix B

Public Protection Partnership New Structure



This page is intentionally left blank

Public Protection Partnership Operational Delegations

This scheme of delegation (“Scheme”) relates to the arrangements made by; Bracknell Forest Borough Council (Bracknell), West Berkshire District Council, (West Berkshire) and Wokingham Borough Council (Wokingham) to discharge their Environmental Health, Licensing and Trading Standards functions jointly through a Joint Committee as agreed by all three Councils through Executive and Council Resolutions.

The Scheme is established by the Joint Public Protection Committee (‘the Joint Committee’) in accordance with Section 101(5) and 101(2) Local Government Act 1972, Section 9EB Local Government Act 2000 and Regulation 9 Local Authorities (Arrangements for the Discharge of Functions) England) Regulations 2012. The Officers identified in the scheme are employed by West Berkshire Council.

Part 1: General Delegation

- 1.1 The Joint Committee delegates to the Public Protection Manager and the Head of Public Protection and Culture (or any successor post holder subsequent to any reorganisation) the functions set out in Schedule 2 of the Public Protection Partnership Inter Authority Agreement dated the 6th January 2017 (herein after known as the ‘Relevant Functions’) and authorises them, subject to the limitations and reservations set out in Part 3 of the Scheme to exercise these functions.
- 1.2 Where any of these Officers is absent for any period West Berkshire Council’s Director for the Environment and Economy Directorate may nominate in writing another Officer to act in his or her place during such absence and shall make record of all such nominations
- 1.3 The Officers referred to in 1.1 above may also exercise all of the operational delegations identified in Part 2 of the Scheme
- 1.4 Where any Officer listed in Part 2 is absent for any period any of the Officers referred to in 1.1 above may nominate in writing another Officer to act in his or her place and shall make record of all such nominations.

Part 2: Operational Delegations

The specific Executive Functions of the Public Protection Partnership set out in column 3 below are delegated to the corresponding Officers listed in column 2 subject to the limitations and reservations set out in Part 3.

No	TITLE OF POST HOLDER	FUNCTIONS DELEGATED
PP1	Head of Public Protection & Culture	To make appointments of Chief Inspectors of Weights and Measures
PP2	Head of Public Protection & Culture Public Protection Manager Strategic Managers	To exercise all the executive and non-executive powers and functions of the Councils relating to the ‘Relevant Functions’ including, but not limited to the powers of Enforcement, issuing Suspension Notices, Licensing suspensions and revocations, Fixed Penalty, Penalty Charge

		Notices, Penalty Notices for disorder, Licensing and Registration, Prosecution and Civil Action
PP3	Head of Public Protection & Culture Public Protection Manager	To appoint and authorise officers (and other persons) to enforce and otherwise deliver the 'Relevant Functions' as set out in the Inter-Authority Agreement dated the 6 th
PP4	Public Protection Manager Strategic Manager – Case Management and Governance Case Manager(s) Other officers of the PPP as authorised by the Public Protection Manager	A. To institute and/or appear on behalf of the Public Protection Partnership in any proceedings relating to the 'Relevant Functions' before any Court or Tribunal B. To initiate and / or conduct proceedings under the Proceeds of Crime Act 2002. C. (Public Protection Manager ONLY) to authorise Officers to appear in any proceedings relating to 'Relevant Functions' in any Court of summary jurisdiction or in the County Court
PP5	Head of Public Protection & Culture Public Protection Manager	Signing any document authorised or required to be given made or issued in accordance with Section 49 Food Safety Act 1990

Part 3: Reservations and Limitations

- 3.1 The exercise of functions to Officers under the Scheme must comply with:-
 - 3.1.1 any legal requirements or restrictions:
 - 3.1.2 the Councils' Constitutions and the governance arrangements of the Joint Committee;
 - 3.1.3 the inter-authority agreement between Bracknell Forest Council, West Berkshire District Council and Wokingham Borough Council relating to the joint arrangements for their Environmental Health, Licensing and Trading Standards functions
 - 3.1.4 the Councils' policy framework and any other relevant plans and strategies approved by the Councils or Joint Committee
 - 3.1.5 the in year Budget
 - 3.1.6 West Berkshire's Human Resources (HR) policies and procedures including those relating to employment and any other relevant corporate Codes;

- 3.1.7 The Code Recommended Practice on Local Authority Publicity;
- 3.1.8 the statutory Best Value requirements;
- 3.1.9 relevant Procedure Standing Orders, Financial Regulations and Financial Instructions
- 3.2 Officers in the exercise of functions delegated by the Scheme may not:
 - 3.2.1 change or contravene relevant policies IT strategies approved by the Joint Committee or wither Council or Cabinet
 - 3.2.2 create or approve new policies and strategies;
 - 3.2.3 take decisions to withdraw public services;
 - 3.2.4 take decisions to significantly modify public services without consultation with the Joint Committee members before exercising the delegated power;
 - 3.2.5 take decisions on significant new powers or duties arising from new legislation before the new powers or duties have been reported to the Joint Committee, (except in cases of urgency and in consultation with the Joint Committee members if reasonably practicable);
 - 3.2.6 provide formal responses to any Government White Paper or Green Paper or other consultation likely to lead to policy changes or have significant impact upon services (except in cases of urgency and in consultation with the Joint Committee members if reasonably practicable);
- 3.3: Consultation with Joint Committee Members**
 - 3.3.1 Where an Officer takes a decision under the delegated Authority on a matter which has significant policy, service or operational implications or is known to be politically sensitive, the Officer shall first consult with the Joint Committee members before exercising the delegated powers.
 - 3.3.2 An Officer may at his/her discretion consult Joint Committee members before exercising delegated powers, or may decide to not exercise delegated powers but refer the matter to the Joint Committee for a decision.
 - 3.3.3 In exercising these operational delegation, Officers will keep local members informed of matters affecting their divisions with any relevant protocols.

This page is intentionally left blank

Public Protection Partnership Priorities 2019/20 - Summary Report

Committee considering report:	Joint Public Protection Committee
Date of Committee:	11 th June 2019
Report Author:	Sean Murphy

1. Purpose of the Report

To set out to the Committee the proposed priorities for the Public Protection Service for 2019/20 and to seek agreement on those priorities as well as the outline work plan to deliver against the identified priority area. These key documents have been developed to inform and direct our proactive project, intervention and enforcement activities as part of our adaptation of the National Intelligence Model

2. Recommendations

2.1 It is recommended that the Committee consider the 2019/20 Priorities Document and resolve that:

- a) The overarching themes identified in the Inter Authority Agreement (IAA) and set out at Appendix C remain relevant and should be retained;
- b) The functional priorities and cross cutting Priorities set out at Appendix D inform service delivery for the coming year; and
- c) The draft Work Plan at Appendix E form the preventative, information gathering and enforcement activities of the Public Protection Service for the coming year.

3. Implications

- 3.1 **Financial:** All identified activities are undertaken as part of the core work of the PPP within the existing revenue budget, this will be by the Strategic Management Team and scrutinised by the Joint Management Board. Where appropriate grants such as support for public health related activity or investigations will be sought and used to deliver the key work streams set out in the Work Plan. Working with other authorities as part of shared working arrangements to deliver efficiencies and effectiveness will also feature as a key priority.

- 3.2 Policy:** It is a key responsibility of the Joint Committee as set out in the IAA to set the strategic direction and priorities for the service. The first set was the approval of the Business Plan in March 2017 which laid out the operating model which included the production of a Strategic Assessment and Control Strategy. The documents before the Committee today are those documents although now titled PPP Priorities and PPP Work plan. These have been drafted in such a manner as to track back to the IAA priorities set out at Appendix C.
- 3.3 Personnel:** There are no specific personnel issues arising out of this decision. If approved the Joint Management Board will consider the most effective structure to deliver against the priorities. Where any implications arise from this a further decision making paper will be brought to the Committee.
- 3.4 Legal:** The functions delegated to the Joint Committee by the Councils have their basis in statute. In this respect many are statutory duties placed on the Councils. In some areas (such as food safety and standards, health and safety etc.) there is a high level of prescription about how elements of the service are delivered. In much though there is a high degree of flexibility for local policy making. The draft PPP Priorities Document invites Members to consider how the service will be prioritised in the coming period and the work plan sets out the manner in which the Councils will deliver the service.
- 3.5 Risk Management:** The emphasis on local drivers may not align with those national regulators which have an oversight function in an area of law. Where there is any divergence from national drivers these will be documented in individual project plans to ensure we can justify and defend robustly any challenges to our methodology and priority setting. Project Management Methodology will enable early identification of operational risks.
- 3.6 Property:** None specifically arising from these proposals. The issue of accommodation and rationalisation of accommodation

remains a priority for the service. Members have previously considered this matter. Work continues in this area but in order to deliver an effective service teams where possible are being co-located following staff consultation. Local delivery remains a high priority.

3.7 Other: None

4. Other options considered

None, the IAA commits the partnership to an intelligence focused delivery model

5. Executive Summary

- 5.1** The vision of the Public Protection Partnership (PPP) is:
‘To protect and support residents and legitimate business through the successful use of information and intelligence, delivering safe and healthy neighbourhoods.’
- 5.2** The Business Plan approved in March 2017 expanded on how the Vision and Aims of the PPP will be delivered through its Operating Model, an adaptation of the National Intelligence Model. An integral part of this model is the production of the Strategic Assessment to inform the setting of priorities
- 5.3** The Business Plan requires the Joint Management Team of the PPP to produce a Strategic Assessment for consideration by the Committee annually
- 5.4** The Control Strategy informs and directs our proactive project, intervention and enforcement activities
- 5.5** Communicating with our Stakeholder Audience is key to delivering the outcomes of our Control Strategy and our Business Plan, this is achieved by following our 2018-2020 Communication Strategy.

6. Conclusion

- 6.1** The PPP Priorities and PPP Work Plan meet the governance requirements of the IAA and Business Plan with regard to priority setting for the delivery of the PPP services across the member authorities. They also set out along with the Food and Feed plan also before Committee today how the Councils will deliver their statutory functions.

Appendices

- Appendix A – Supporting Information
- Appendix B – Equalities Impact Assessment
- Appendix C – Inter-Authority Agreement Priorities
- Appendix D – PPP Priorities
- Appendix E – PPP Work plan

Background Papers: Business Plan – approved by Joint Committee March 2017; 2018/19 Strategic Priorities and Control Strategy approved by JPPC in March 2018

PPP Strategic Aims and Priorities Supported:

The proposals will help achieve the following Public Protection Partnership aims as stated in the Inter Authority Agreement:

- 1 – Community Protection**
 - 2 – Protecting and Improving Health**
 - 3 – Protection of the Environment**
 - 4 – Supporting Prosperity and Economic Growth**
 - 5 – Effective and Improving Service Delivery**
-

Officer details:

Name: Sean Murphy

Job Title: Public Protection Manager

Tel No: 01635 519930

E-mail Address: sean.murphy@westberks.gov.uk

This page is intentionally left blank

Appendix A

Public Protection Partnership Priorities - Supporting Information

1.0 Background

- 1.1 The model that forms the basis of the Public Protection Partnership represents a significant shift in the way that public protection services as they are commonly known were traditionally delivered across the Council areas. In the first instance the functions that form the statutory basis of the work of regulatory services were delegated to the Joint Committee. The operational delivery of the service was delegated to the service management. The Committee itself was tasked with setting the strategic direction of the service and considering and where appropriate approving any key plans and policies. It also has responsibility for oversight of performance and recommending budgets and fees and charges. With exception of the latter it has full delegated authority in respect of all Council and Executive functions of the Councils in respect of the relevant functions
- 1.2 The Inter-Authority Agreement that was considered by the Councils in the autumn and winter of 2016 contained a set of initial priorities. These had been drawn from the cross cutting and local priorities of the Councils. A summary of these can be found at Appendix C to this report. It is the view of the Joint Management Board and the Service Management Team that these remain relevant and provide a suitable basis for the Committee to deliver a service that is adaptable to local need and national and local policy trends and requirements.
- 1.3 At its inaugural meeting in March 2017 the Committee considered the Business Plan for the Public Protection Partnership. This contained within it a proposal that the service be delivered through the adoption of the National Intelligence Model (NIM). At the heart of NIM is the need for an assessment of priorities based on the information at the time of preparation along with a work plan setting out in broad terms how the service intends to deliver against the priorities to meet community need. This report puts before the Committee a Priorities Document and Work Plan. Both documents have evolved from last year's strategic assessment and control strategy but offer a simplified approach to language and greater detail on the source of the priorities. It is important to state that whilst priorities can be established at any given point in time, the situation remains dynamic and the service needs to be responsive to any change in local or nationally led demand. Examples of this would include large scale investigations, food poisoning outbreaks or an animal disease outbreak.

2.0 Law in Context

- 2.1 The remit of the Public Protection is like none other in the local government setting. It is primarily a law enforcement / regulatory body covering everything from private water supplies to smuggling and food safety to national fraud

matters. Its sphere of influence is as wide as its remit and the service is uniquely placed to deliver against the widest possible range of local priorities.

- 2.2 The service operates in a local and national policy setting. Some matters such as Air Quality, Fraud and Private Sector Housing are matters of both local and national policy concerns. Others such as licensing (whilst having a national policy drive) maintain a distinctly local feel as priorities.
- 2.3 The Public Protection Partnership has a range of tools at its disposal to deliver against local and national priorities. As stated in 2.1 above it is primarily an enforcement service tasked with enforcing over a 100 pieces of primary and enabling Acts of Parliament as well as many 100s of pieces secondary regulations, standards etc.
- 2.4 Effective legislative controls however have context. And so it is with much of what the PPP are tasked to deliver. Most is statutory but the law with a few notable exceptions e.g. food and feed, nuisance etc. does not lay down how the service is delivered. That is a matter for the Joint Public Protection Committee.
- 2.5 The approach of the service management team in developing the work plan and priorities has been to look at the context of the law in the local setting and to consider how that primary aims of the legislation can best be delivered. The following sets out a couple of examples to this approach:

2.6 **Example 1 – Doorstep Crime**

Doorstep Crime is one of the most aggressive forms of acquisitive crime. It is often linked to money laundering, forced labour and organised crime groups. It also often presents significant safeguarding issues with victims all too readily subject to ongoing financial abuse that effects their mental health and overall feeling of wellbeing and safety.

The approach taken by the service looks at the issue from three angles. Prevention, Intelligence and Enforcement. Examples of tasks in these groupings are as follows:

Prevention	Intelligence	Enforcement
Working with community groups No cold calling zones	Intelligence gathering through patrols and reports	Rapid Action Team (RAT)
Routine Doorstep Crime Patrols	Suspect and victim profiling	Integrated operating model with TVP
Working with partner organisations e.g. TVP	Encouraging reporting through publicity and community engagement	Working with south east regional crime unit and HMRC
Publicity around	Actively looking for	Specialist Acquisitive

successful detections and prosecutions	modern slavery and other forms of coercive behaviour	Crime Team
Referrals to and from safeguarding Teams		Financial Investigation for money laundering and confiscation
Fraud Victim Support Officer		Case Management

2.7 *Alcohol and Tobacco and Young People*

This is an area of national and local policy concern. The market is heavily regulated and local authorities have significant powers to act. One area of concern is that access and consumption of these products by young people. It is known that in respect of both products early understanding of risk by young people combined with a robust compliance regime can have significant effects on reducing consumption with the associated risks to health and effects on communities through alcohol related antisocial behaviour and crime. In the case of this area of our work the approach includes:

Prevention	Intelligence	Enforcement
Licensing Act Policy	Consideration of complaints and SR's	Licensing Inspections
Licence Conditions	Annual Pupil Survey	Trading standards test purchasing
Year 6 (Tobacco) and Year 9 (Alcohol and Tobacco) programme in schools	Working with Schools to identify risk premises	Seizure of counterfeit and smuggled goods
Targeted campaigns on consumption	Responsible authority role	Licence Reviews
Managing of Tobacco Control Alliance		Warnings and Prosecutions
Advisory visits to retailers		
Community Alcohol Partnerships		
Licensing Newsletters		

2.8 These two examples are indicative of how the priorities and work plans are delivered in practice. In essence we examine the evidence base, look at the

problem from all angles the develop an holistic approach to tackling the problem. This model enables us to work broadly across the Councils agendas by protecting the most vulnerable and communities more widely, protecting and improving health, protecting the environment and through assisting business to achieve compliance and protecting from unfair competition we are able to help strengthen the local economy.

3.0 Developing the Priorities

- 3.1 A major assessment has taken place to develop the priorities for the service. This has included an analysis of service requests, consumer complaints about traders, and enquiries from businesses. We have also analysed the outcomes from the output of last year's work streams.

Local, regional and national priorities have also been considered by the along with emerging priorities. Locally sources have included each Councils priorities, strategic needs assessment and local crime related matters. Nationally sources have included government departments such as BEIS, DEFRA and DCLG, NGO's such as the Food Standards Agency, Environment Agency and Health and Safety Executive as well as co-ordinating bodies such as the National Trading Standards Board and Trading Standards South East.

Local priorities have also featured where not cross service will continue to be delivered. These include enviro-crime, London Road Landfill Site, abandoned vehicles and issues such a road traffic overloading and weight restriction enforcement.

- 3.2 The Priorities also include matters that are described as cross-cutting such as modern slavery and organised crime which officers from across the service may come across through the delivery of the control strategy and for which they need adequate awareness and training.
- 3.3 Staff have also been significantly engaged in the development of priorities and work plans. There have been workshops to capture staffs thoughts on emerging and existing issues and to consider the best routes to delivery. These drafts have been shared with the management team and all staff prior to consideration by the Committee today and amended accordingly.
- 3.4 There are many aspects of the service that do not feature in these plans. The so-called *business as usual* aspects of our work. These include areas like inspections, service requests, business advice, private water supplies, investigations etc. etc. These remain as important as the priority areas and over time are being developed as part of the priorities model. On a day to day basis they integrate with the model as the examples shown above indicate.

4.0 Delivering against the Priorities

- 4.1 If agreed the work plan will be delivered through a programme delivery model. In essence work streams will be and are being developed into project plans based on established project management principles. These will be delivered at team and project group level and monitored by the Partnership

Management Board and Service Management Team. Operational risks can be identified and the Strategic Tasking Group ensure appropriate resourcing and oversight.

- 4.2 Performance reporting will be inherent part of the programme delivery model to sit alongside other areas of performance reporting such as response times and satisfaction ratings. The IAA also contained performance themes such as reducing detriment and measures have been developed for these and an update on this appears elsewhere on this agenda.

PPP Strategic Aims and Priorities Supported:

The proposals will help achieve the following Public Protection Partnership aim as stated in the Inter Authority Agreement:

x 5 – Effective and Improving Service Delivery

Officer details:

Name: Sean Murphy
Job Title: Public Protection Manager
Tel No: 01635 519840
E-mail Address: sean.murphy@westberks.gov.uk

Appendix B – Equalities Impact Assessment

Equality Impact Assessment – Stage One

What is the proposed decision that you are asking the Committee to make:	To consider the 2019/20 Priorities and Work Plan for the PPP
Summary of relevant legislation:	See report
Does the proposed decision conflict with any of the partnerships key objectives?	No
Name of assessor:	Sean Murphy
Date of assessment:	02/06/2019

Is this a:		Is this:	
Policy	✓	New or proposed	✓
Strategy		Already exists and is being reviewed	
Function		Is changing	
Service			

1. What are the main aims, objectives and intended outcomes of the proposed decision and who is likely to benefit from it?	
Aims:	To set out the 2019/20 priorities and the work plan for the PPP
Objectives:	These key documents form the basis of the work of the PPP for 2019/20. They are based on an assessment of intelligence and policy at the time of writing. By their nature they are designed to address the needs of local communities.
Outcomes:	A focussed locally delivered public protection service relevant to the needs of local communities and of all protected groups.
Benefits:	The delivery of the key PPP priorities of: Community Protection and in particular the protection of the vulnerable Protecting and Improving Health Protection of the Environment Supporting economic growth Improving and efficient service delivery

<p>2. Note which groups may be affected by the proposed decision. Consider how they may be affected, whether it is positively or negatively and what sources of information have been used to determine this. (Please demonstrate consideration of all strands – Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation.)</p>		
Group Affected	What might be the effect?	Information to support this
Age	No	
Disability	No	
Gender Reassignment	No	
Marriage and Civil Partnership	No	
Pregnancy and Maternity	No	
Race	No	
Religion or Belief	No	
Sex	No	
Sexual Orientation	No	
Further Comments relating to the item:		

3. Result	
Are there any aspects of the proposed decision, including how it is delivered or accessed, that could contribute to inequality?	No
Please provide an explanation for your answer: The premises are accessibility compliant.	
Will the proposed decision have an adverse impact upon the lives of people, including employees and service users?	No

This page is intentionally left blank

Extracts from the PPP Business Plan and the Inter Authority Agreement (IAA)

Business Plan

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.

PUBLIC PROTECTION PARTNERSHIP

Stated Aims – (IAA sch5 and PPP Business Plan section 5)

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

Key Performance indicators 2017-18 (IAA sch5)

1. Decreasing level of detriment suffered by residents
2. Increase level of compliance in critical areas
3. Effective budget management and use of resources
4. Preventing residents from harm through expanding the use of social media and key communication channels
5. Maintain high levels of customer and business satisfaction

PUBLIC PROTECTION PARTNERSHIP

Priorities (IAA sch5)

1. Community Protection

- a. Contributing to the effective tackling of crime and disorder
- b. Tackling the issues that cause the greatest harm to individuals and communities
- c. Protection of the most vulnerable residents
- d. To act as champion for the local area
- e. Providing safeguards to the community through an effective licensing service

2. Protecting and Improving Health

- a. Protecting people from harmful products and services (including food)
- b. Allowing residents to make informed choices on matters that impact their health
- c. Developing and delivering initiatives designed to improve and enhance health and wellbeing of individuals
- d. Supporting relevant priorities identified by local Strategic Joint Needs Assessments
- e. Tackling the causes of health inequalities

3. Protection of the Environment

- a. Protecting the environment from harm
- b. Tackling those that chose to harm the environment

4. Supporting Prosperity and Economic growth

- a. Supporting compliant local businesses to thrive through the provision of advice and guidance
- b. Protecting businesses from illegal activities that damage their economic interests
- c. Supporting the rural economy

5. Effective and Improving Service Delivery

- a. Implementation of the national intelligence model to identify and effectively tackle priority areas
- b. Building effective working relationships with key partners within the Councils to deliver the key objectives of the Service and the Councils
- c. Building effective relationships with key external partners including Thames Valley Police, Royal Berkshire Fire and Rescue Service, housing providers, other local authorities, national and regional delivery bodies and community based groups and organisations
- d. Improvement and enhancement of the service through effective evaluation and quality management
- e. Communication well with local people and businesses

This page is intentionally left blank

PPP PRIORITIES

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

June 2019



2019

Contents

1. Introduction	3
2. Summary from the Workplan	3
3. Framework for Projects in 2019-20	3
4. eCrime.....	4
5. Organised Crime Groups (OCG's).....	5
6. Vulnerable Adults and Children	6
7. Modern Day Slavery.....	7
8. Doorstep Crime and Mass Marketing	8
9. Poor Housing Standards in the Private Rented Sector.....	9
10. Air Pollution.....	10
11. Unsafe Food	11
12. Childhood Obesity	12
13. Alcohol and Tobacco Consumption.....	13
14. Poor Animal Welfare	14
15. Risk to the Reputation of UK Export of Food.....	15
16. Accidents in the Catering and Hospitality Industries.....	16
17. Impact of Noise on Communities	17
18. Unsafe Consumer Goods	18

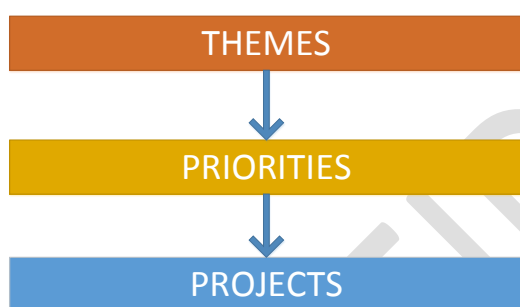
1. Introduction

The priorities of the Public Protection Partnership (PPP) are informed by the assessment of evidence from across a wide range of sources, this can be reviewed in the Workplan 2019-20.

In reading this document it should be entirely clear what the planned output of the PPP will be.

The key word is 'planned', it must always be remembered that in the field of public protection, within local government, there will inevitably be incidents, events and adjustments in the political landscape that require evaluation and assessment which may then lead to a change in the plan. The PPP must be ready and able to adjust its plans for such eventualities.

2. Summary from the Workplan



The PPP aim to make it clear how they operate and show why it does the work it does. Communication and transparency is key to the success of the partnership and each project undertaken should be linked back to an evidence based approach.

3. Framework for Projects in 2019-20

The PPP have assessed the themes and determined the priorities, laid out in the workplan. Each project should be considered with 3 things in mind:

Prevention

- What action can the PPP take that would stop a problem from occurring?

Intelligence

- What information can the PPP gather to help make better decisions?

Enforcement

- What action can the PPP take to ensure those breaking the law are taken to task?

4. eCrime

As a cross-cutting issue the PPP will look for opportunities to tackle consumer and business detriment caused by eCrime across all its themes, priorities and projects.

Prevention

- Active media campaigns
-
- Presence on online selling platforms
-
- Work with victims to improve their resilience
-
- Identify target groups and support them

Intelligence

- Work with partner agencies
-
- Encourage reporting from legitimate traders, consumers and elected members
-
- Make reporting eCrime easier
-
- Develop more accurate victim profiles

Enforcement

- Target resources where intelligence shows most impact on local communities
-
- Develop staff to undertake complex eCrime investigations
-
- Provide dedicated case management support for eCrime investigations
-
- Look to national and regional agencies for support on complex cases

5. Organised Crime Groups (OCG's)

Another cross-cutting issue is OCG's which can involve such complex work as financial investigations, proceeds of crime, fraud across multiple borders, sometimes international, all of which requires careful risk management.

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Presence on online selling platforms•• Work with victims to improve their resilience•• Identify target groups and support them	<ul style="list-style-type: none">• Work with partner agencies•• Encourage reporting from legitimate traders, victims and elected members•• Make reporting OCG activity easier•• Develop more accurate victim profiles	<ul style="list-style-type: none">• Target resources where intelligence shows most impact on local communities•• Develop staff to undertake complex OCG investigations•• Provide dedicated case management support for OCG investigations•• Look to national and regional agencies for support on complex cases

6. Vulnerable Adults and Children

This cross cutting issue includes safeguarding and investigations involving people from recognised vulnerable groups.

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Work with victims to improve their resilience•• Identify target groups and support them	<ul style="list-style-type: none">• Work with partner agencies•• Encourage reporting from concerned citizens and elected members•• Make reporting a safeguarding issue easier•• Develop more accurate victim profiles	<ul style="list-style-type: none">• Target resources where intelligence shows most impact on local communities•• Develop staff to undertake complex safeguarding investigations•• Provide dedicated case management support for safeguarding investigations

7. Modern Day Slavery

A further cross-cutting issue looking at the problem of exploitation where people are being kept in poor conditions and forced to work for limited financial reward.

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Work with victims to improve their resilience•• Identify target groups and support them	<ul style="list-style-type: none">• Work with partner agencies•• Encourage reporting from legitimate traders, concerned citizens and elected members•• Make reporting of MDS easier•• Develop more accurate victim profiles	<ul style="list-style-type: none">• Target resources where intelligence shows most impact on local communities•• Develop staff to undertake complex MDS investigations•• Provide dedicated case management support for MDS investigations•• Look to national and regional agencies for support in complex MDS cases

8. Doorstep Crime and Mass Marketing

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Promote trader approved schemes•• Work with victims to improve their resilience•• Identify target groups and support them	<ul style="list-style-type: none">• Work with partner agencies•• Improve skills on Thames Valley Police to increase referrals•• Encourage reporting from legitimate traders, victims, local members and concerned citizens•• Make reporting of incidents easier•• Develop more accurate victim profiles	<ul style="list-style-type: none">• Target resources where intelligence shows most impact on local communities•• Develop staff to undertake complex investigations•• Provide dedicated case management support for investigations•• Look to national and regional agencies for support in complex cases

9. Poor Housing Standards in the Private Rented Sector

Prevention

- Active media campaigns
-
- Work with tenants to improve their resilience
-
- Liaise with local fire services to understand high risk areas and target them
-
- Identify vulnerable groups and support them

Intelligence

- Work with partner agencies
-
- Encourage reporting from legitimate landlords, tenants, elected members and affected neighbours
-
- Make reporting of poor housing standards and tenant issues easier
-
- Survey residential areas to identify Houses in Multiple Occupation (HMOs)

Enforcement

- Clear inspection program of targeted residential properties, including mobile home and caravan sites
-
- Develop staff to undertake complex housing and licensing investigations and knowledge about property tribunals
-
- Provide dedicated case management support for housing and site licence investigations

10. Air Pollution

Prevention

- Active media campaigns
-
- Actively engage in the planning and transport policy process
-
- Share information with local health groups
-
- Identify vulnerable groups and support them

Intelligence

- Work with partner agencies
-
- Monitor appropriate sites for air pollution
-
- Encourage reporting from those affected by pollution, residents and elected members
-
- Make reporting of pollution incidents easier
-
- Research Joint Strategic Needs Assessments and understand local Indices of Multiple Deprivation

Enforcement

- Develop staff to undertake complex nuisance investigations which impact on air quality
-
- Clear inspection programme for appropriate permitted industrial processes
-
- Provide dedicated case management support for investigations into industrial processes that breach permit conditions relevant to air quality

11. Unsafe Food

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Food business inspections and visits•• Link work with commercial businesses and private water supplies•• Active media campaigns•• Work with consumer groups and trade associations•• Identify vulnerable groups and support them e.g. allergen exposure•• Enhanced support for the poorest performing food businesses	<ul style="list-style-type: none">• Food sampling•• Work with partner agencies•• Encourage reporting from legitimate traders, concerned consumers, residents and elected members•• Make reporting of poor labelling, unhygienic premises and contaminated food easier•• Monitor data from Public Health England on infectious disease risk profiles•• Monitor data from private water supply risk assessments	<ul style="list-style-type: none">• Clear inspection program of high and medium risk food businesses•• Develop staff to undertake complex food hygiene and standards investigations•• Provide dedicated case management support for food hygiene and standards investigations•• Investigation of confirmed infectious disease cases linked to food businesses•• Investigate food complaints that have caused harm•• Investigate private water supply complaints and compliance issues

12. Childhood Obesity

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Work with local health groups, schools and all forms of early years education providers•• Identify vulnerable groups and support them•• Maximise participation in targeted healthy eating schemes	<ul style="list-style-type: none">• Work with partner agencies•• Encourage reporting from health professionals•• Research Joint Strategic Needs Assessments and understand local Indices of Multiple Deprivation	<ul style="list-style-type: none">• Incorporate healthy eating into routine inspection and sampling processes

13. Alcohol and Tobacco Consumption

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Work with local health groups, schools, trade associations and all local charities with shared objectives•• Identify vulnerable groups and support them•• Maximise participation in targeted health projects designed to reduce consumption and smoking rates	<ul style="list-style-type: none">• Work with partner agencies•• Encourage reporting from health professionals, legitimate traders, residents and elected members•• Make reporting of any under age sales easier•• Research Joint Strategic Needs Assessments and understand local Indices of Multiple Deprivation	<ul style="list-style-type: none">• Clear inspection program for licenced premises•• Pursue licence reviews for problematic premises/events•• Provide dedicated case management support for licensing investigations

14. Poor Animal Welfare

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Presence on online selling platforms for animals•• Work with animal owners and all local charities with shared objectives•• Identify target groups and support	<ul style="list-style-type: none">• Work with partner agencies•• Encourage reporting from legitimate traders, consumers, residents and elected members•• Make reporting of animal welfare issues easier	<ul style="list-style-type: none">• Clear inspection program of high and medium risk businesses•• Develop staff to undertake complex welfare investigations•• Provide dedicated case management support for welfare investigations

15. Risk to the Reputation of UK Export of Food

Prevention

- Active media campaigns
-
- Work with local food exporters including the issuing of Export Health Certificates
-
- Identify target groups and support them

Intelligence

- Work with partner agencies
-
- Encourage reporting from legitimate traders, consumers and elected members
-
- Make reporting of food fraud easier

Enforcement

- Clear inspection program of high and medium risk food businesses
-
- Investigate complaints about food exporters and matters relating to Export Health Certificates
-
- Develop staff to undertake complex food investigations
-
- Provide dedicated case management support for food investigations

16. Accidents in the Catering and Hospitality Industries

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Work with victims•• Identify target groups and support them	<ul style="list-style-type: none">• Work with partner agencies•• Encourage reporting from legitimate traders, employees, consumers and elected members•• Make workplace safety and welfare concerns easier for employees and the public to report	<ul style="list-style-type: none">• Clear inspection program of relevant businesses identified using Health and Safety Executive criteria•• Develop staff to undertake complex H&S investigations•• Provide dedicated case management support for H&S investigations

17. Impact of Noise on Communities

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Seek to attach conditions to construction and demolition sites•• Seek to impose conditions to licenced premises where appropriate•• Identify events with a risk of creating noise nuisance and develop noise management plans	<ul style="list-style-type: none">• Work with partner agencies•• Encourage reporting from victims, residents and elected members•• Make reporting noise and licensing problems easier	<ul style="list-style-type: none">• Develop staff to undertake complex nuisance and licensing investigations•• Pro-actively monitor events that meet agreed risk criteria•• Pursue licence reviews for problematic premises/events•• Provide dedicated case management support for nuisance and licensing investigations

18. Unsafe Consumer Goods

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none">• Active media campaigns•• Presence on online selling platforms•• Work with victims to improve their resilience•• Identify target groups and support	<ul style="list-style-type: none">• Work with partner agencies•• Encourage reporting from legitimate traders, victims and elected members•• Make reporting unsafe consumer goods easier	<ul style="list-style-type: none">• Conduct surveys and test purchasing of targeted goods/suppliers•• Develop staff to undertake complex trading practice investigations•• Provide dedicated case management support for investigations

PPP WORKPLAN

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

June 2019



2019

Contents

Foreword	4
1. Introduction	5
2. Executive Summary.....	6
3. Key Findings from 2018-19	6
3.1. Reactive	7
3.2. Projects.....	9
3.3. Planned Work Activity	10
4. Themes	11
4.1. Community Protection	11
4.2. Protecting and Improving Health	12
4.3. Protection of the Environment.....	12
4.4. Supporting Prosperity and Economic growth.....	13
4.5. Effective and Improving Service Delivery.....	13
5. How is the Workplan created?	14
6. Priorities.....	14
6.1. Cross Cutting Priorities	14
6.1.1. eCrime:.....	14
6.1.2. Organised Crime Groups:.....	15
6.1.3. Protecting Vulnerable Adults and Children:.....	15
6.1.4. Modern Day Slavery:.....	15
7. Staff Workshops.....	15
7.1. Customer Service.....	15
7.2. Staff Feedback on Priorities.....	16
8. Things to Consider When Deciding a Priority	17
9. Priorities Being Kept from 2018/19	19
10. New Priorities for 2019/20	19
11. Projects.....	19

11.1	The 2019-20 Projects List	19
11.2	The 2019-20 Strategic Projects List	21
11.3	The 2019-20 Research Projects List.....	21
12.	Planned Work Activity	22
13.	Partnership Contracts and Service Level Agreements.....	23
14.	Looking Ahead	23
15.	Evidence Gaps	25
	References	26

CONFIDENTIAL

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



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

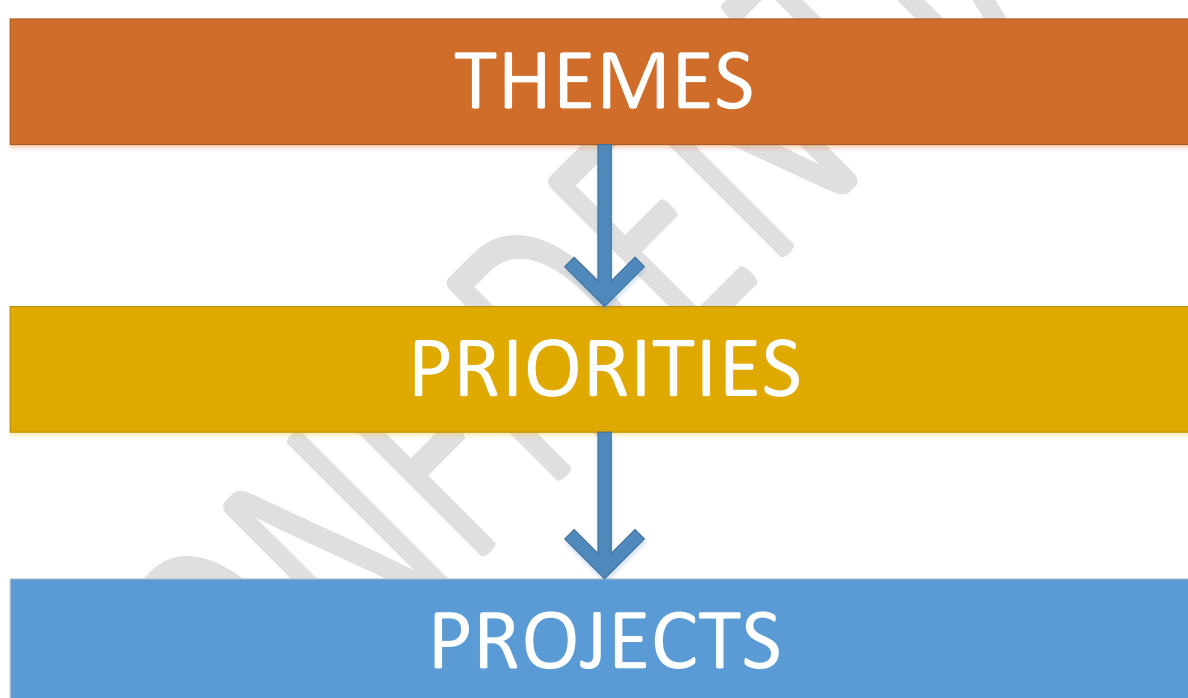


1. Introduction

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).

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



WOKINGHAM
BOROUGH COUNCIL

- 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

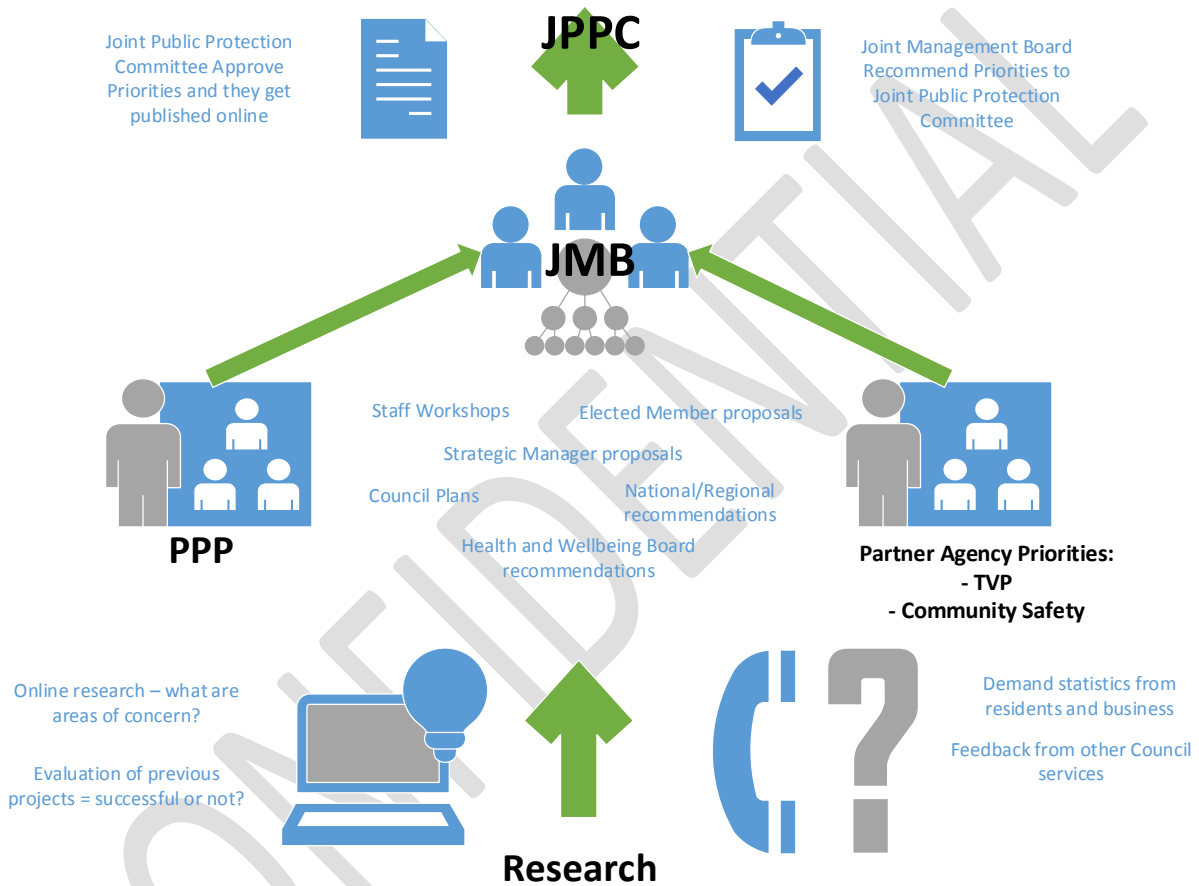
²⁷ Features in both National and Regional Industrial Strategies – see references

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

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



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.

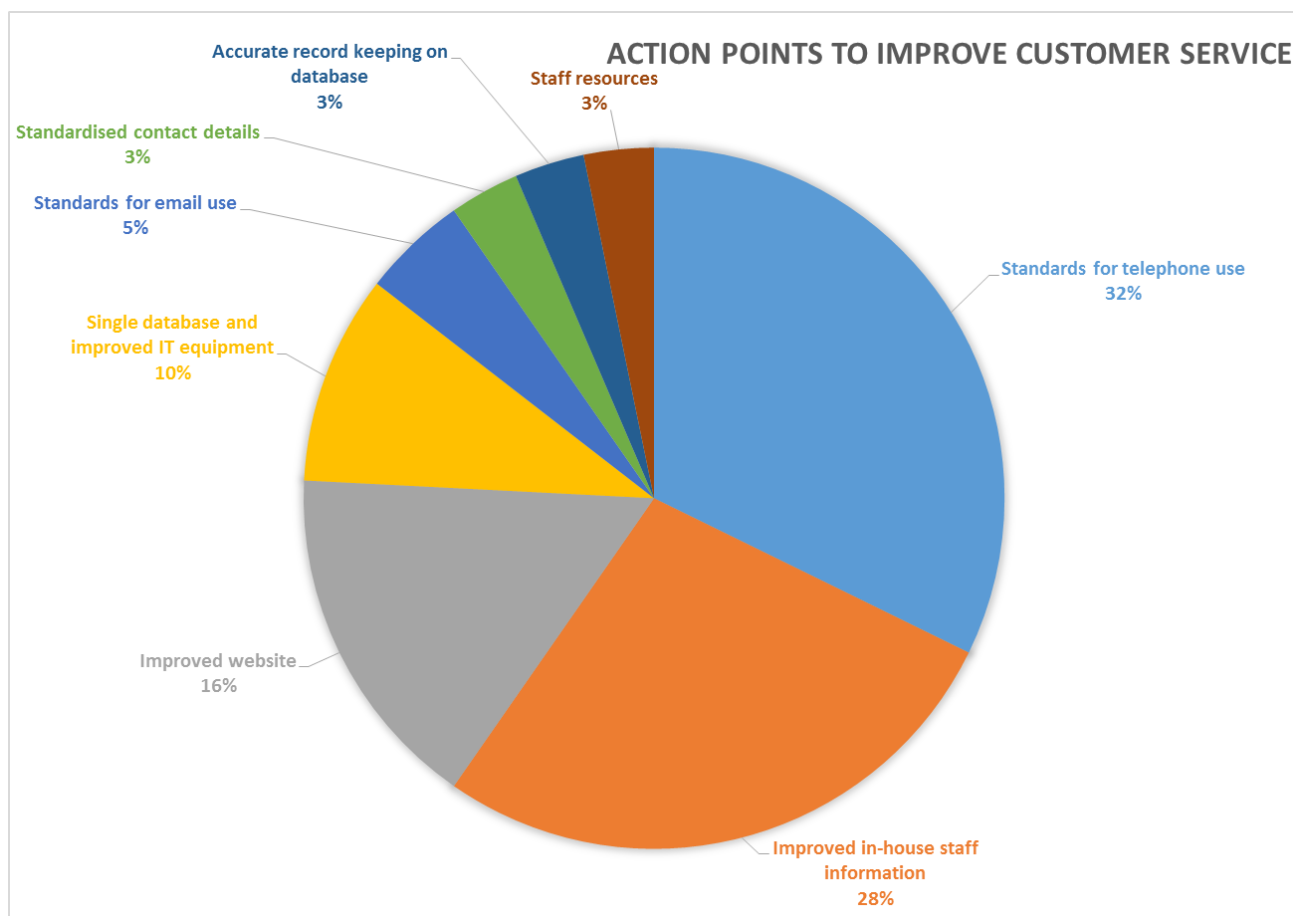
7. Staff Workshops

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.

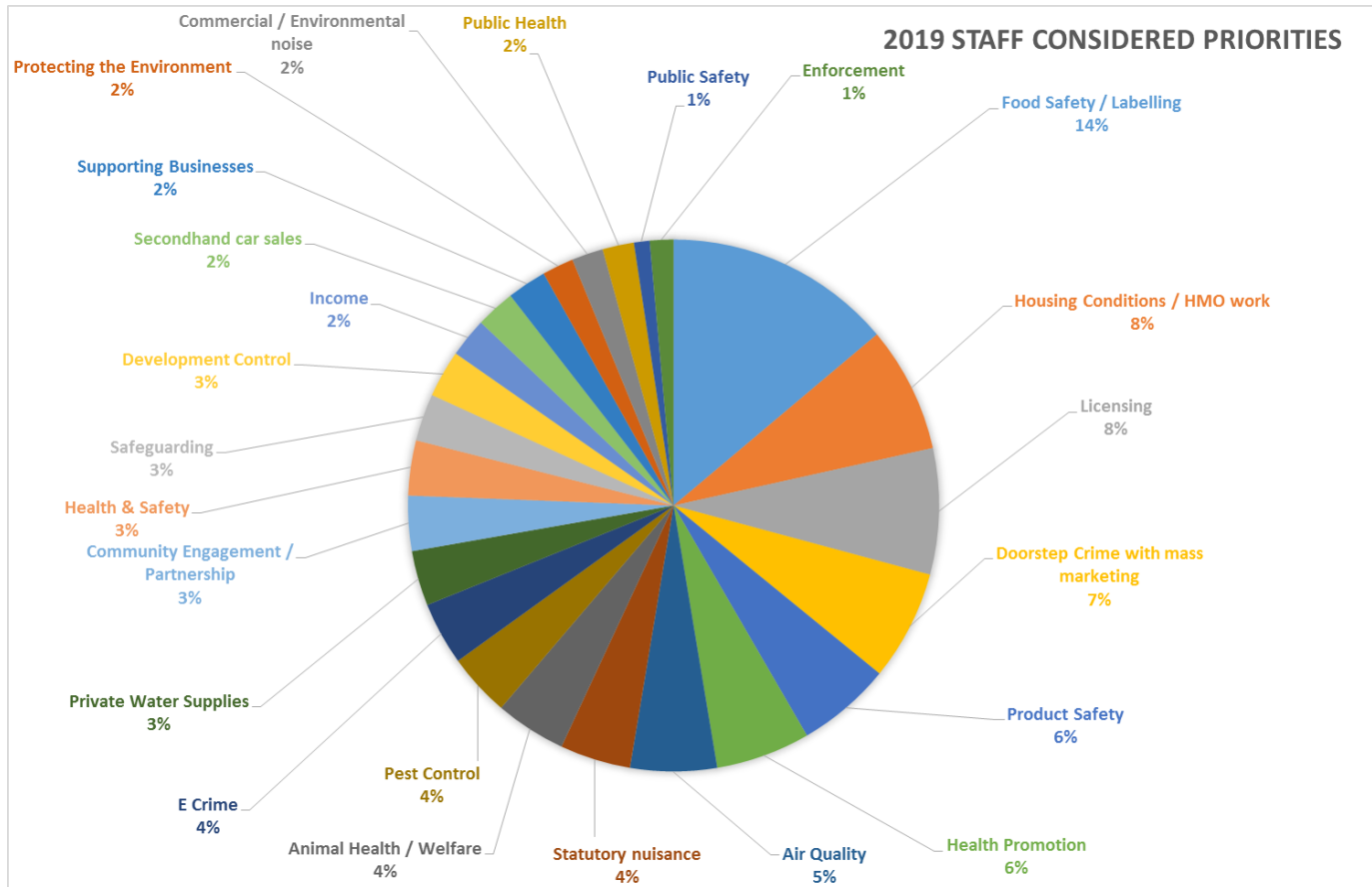


7.2 Staff Feedback on Priorities

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>

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



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:

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





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



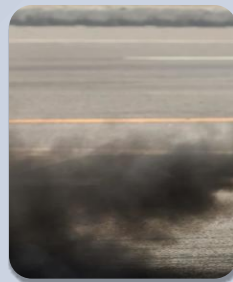
E-Crime

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



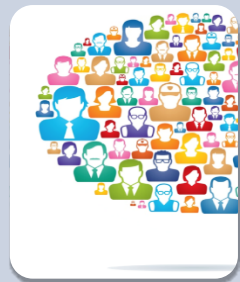
Housing

- 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

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



WOKINGHAM
BOROUGH COUNCIL

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>dwelling³⁵</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.

CONFIDENTIAL

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



References

1. *A Green Future: Our 25 Year Plan to Improve the Environment (DEFRA - HM Government) (2018).*
2. *Air quality plan for nitrogen dioxide (NO2) in UK (2017).*
3. *Annual Report 2017-18 (Shelter)*
4. *Berkshire Local Industrial Strategy – Framework document for consultation (March 2019).*
5. *Bracknell Forest Community Partnership strategic Assessment (2019)*
6. *Building Communities Together (West Berkshire Council) Strategic Assessment presentation (2018-19).*
7. *Clean Growth Strategy (Department for Business, Energy and Industrial Strategy) (2017).*
8. *Drinking Water 2017 (Drinking Water Inspectorate) (2018)*
9. *Industrial Strategy – Building and Britain fit for the future (BEIS – HM Government) (2017).*
10. *Integrated Risk Management Plan – Modelling Methodology (Royal Berkshire Fire and Rescue Service) (2018/19).*
11. *Police and Crime Plan for the Thames Valley 2017-2021 (Police and Crime Commissioner Thames Valley) (2017)*
12. *“Seamless Health” Bracknell Forest Joint Health and Wellbeing Strategy (2016-2020).*
13. *Strategic Intelligence Assessment 2017 (Safer Oxfordshire Partnership) (2017)*
14. *Strengthening national capacity for product safety 2018-2020 strategy (Office for Product Safety and Standards) (2018)*
15. *West Berkshire Joint Health and Wellbeing Strategy (2017-2020).*
16. *Wokingham Joint Health and Wellbeing Strategy (2018-2021).*
17. *Wokingham Joint Strategic Needs Assessment (<http://jsna.wokingham.gov.uk/>)*

This page is intentionally left blank

Public Protection Official Feed and Food Control Service Plan 2019-2020 – Report

Committee considering report: Joint Public Protection Committee
Date of Committee: 11 June 2019
Report Author: George Lawrence

1. Purpose of the Report

This report accompanies the Official Feed & Food Controls Service Plan 2019-2020 (“the plan”). The Committee are asked to agree the items summarised in appendix A to this report which are taken from the plan, and to note the plan at appendix B. Appendix C provides supporting information.

The plan essentially documents the services’ involvement with feed and food official controls alongside the partnerships aspirations to deliver on inspections and audits across the three authority’s in line with the PPP model of delivery.

2. Recommendations

The Committee is asked to agree the summary document at Appendix A and the full plan at Appendix B to this report.

3. Implications

Financial: The resources allocated to these functions are set out in the plan. All expenditure for these functions will be met from existing revenue. Local authorities receive additional grants from the Food Standards Agency for enforcing the controls relating to animal feed, but there is no cost recovery mechanism for routine programme intervention work as detailed in the plan (with the exception of those activities highlighted in the plan).

Policy: The plans set out the over-arching delivery model for all aspects of the PPP approach in protecting the food chain. The plan identifies with key priority areas as well as setting out how we will deliver against our statutory requirements. This may be subject to change dependant on outcomes of tactical and strategic tasking group priorities throughout the coming year.

Personnel: The resource allocated to these functions in terms of officer time is set out in the detailed plans. There are currently a number of vacancies across the Partnership including vacancies in the area of work covered by the attached plans. These are being

considered as part of the wider Public Protection staffing restructure and budget position.

Legal: The IAA that set up the Partnership effectively delegates responsibility for the strategic direction of the joint service to the Joint Committee. The responsibilities of the committee are set out in Schedule 1 to the agreement.

Included in those responsibilities is the enforcement of legislation relating to the control of food safety, hygiene, quality, labelling and animal feed safety, hygiene and standards. These legislative requirements sit alongside Statutory Codes of Practice issued under the Food Safety Act 1990.

The Food Standards Agency (FSA) developed the 'Framework Agreement on official feed and food law controls' that sets out what the FSA expects from local authorities in their delivery of official controls on feed and food law. It also requires that a feed and food plan(s) is considered annually by each authority with responsibility for exercising controls. This Food and Feed Service Plan has been written according to the detailed headings the FSA have dictated.

Risk Management: There are no specific risk identified in this report,

Property: No implications.

Other: None

4. Other options considered

The FSA Framework agreement and Statutory Codes of Practice are fairly prescriptive in who should carry out food enforcement functions, what should be prioritised and how certain activities should be carried out. The plans contain a mixture of activities based on those prescribed as well as other priorities identified through the PPP strategic assessment.

5. Executive Summary

The Inter-Authority Agreement (IAA) between the Councils sets out of the functions that are delegated to the Joint Committee under the terms of the agreement. These include an array of statutory functions relating to the enforcement of food hygiene, safety, quality, labelling, nutrition claims and other claims such as organic and gm free. In addition there are a range of measures relating to safety, standards, labelling and hygiene of animal feed.

The IAA also identifies the key priority areas for the service which are community protection; protection and improving health; protection of the environment; supporting prosperity and economic growth and the delivery of effective and improving service.

The implementation of food and feed controls by local authorities is controlled through a combination of EU and domestic implementing legislation. There are statutory codes (Food Law Codes of Practice) issued under the Food Safety Act 1990 that deal with a range of matters from practical issues relating to risk assessment, inspection programmes and the implementation of enforcement controls. They also deal in detail with officer competences and internal controls required by food and feed enforcement authorities. These controls are subject to a range of reporting requirements to the EU via FSA as well as a Framework Agreement. The FSA also have a local authority audit programme to ensure that all of these requirements are being met.

One requirement of the 'Framework Agreement' is that local authorities produce a plan to a prescribed format setting out how they intend to discharge their statutory functions in relation to food and animal feed. The plan is required to set out priorities, inspection targets, areas for improvement and resource levels.

6. Conclusion

The plan sets out how the PPP intends to deliver the statutory functions of the three authorities that operate within the PPP arrangement. Officers are of the view the plans represent the best balance between the requirements placed on the service and the resource levels available to deliver against the key requirements and objectives.

There is a summary document of the Food and Feed Plan at appendix C

This is one of many important areas of responsibility that falls to the Partnership insofar as its impact on the health and wellbeing of residents. Additionally, the PPP recognises that the food industry at all levels from farm to fork is important to the local economy, and in this industry confidence is everything. A strong regulatory framework is designed to provide that confidence and ensure fair competition.

The Committee is asked to consider the plan and agree the summary document at Appendix C.

Appendices:

Appendix A – Supporting Information

Appendix B – Official Feed and Food Control Service Plan 2019-20

Appendix C – Summary of Food and Feed Plan

PPP Strategic Aims and Priorities Supported:

The proposals will help achieve the following Public Protection Partnership aims as stated in the Inter Authority Agreement:

- X 1 – Community Protection**
 - X 2 – Protecting and Improving Health**
 - X 4 – Supporting Prosperity and Economic Growth**
-

Officer details:

Name: George Lawrence

Job Title: Strategic Manager – Compliance and Enforcement

Tel No: 01635 519163

E-mail Address: George.Lawrence@westberks.gov.uk

Public Protection Partnership Official Feed and Food Controls Service Plan 2019-2020 – Supporting Information

1. Supporting Information – Food Control

- 1.1 Legal controls relating to food safety, hygiene and quality have been in place for many years. Over the years, the regulatory framework for feed and food control has grown from to keep pace with relatively rapid advances in feed and food production techniques such as preservation, packaging, and storage – at the same time, responding to scientific advancements in understanding risks associated with infectious disease and feed and food, market demands, shopping habits and business pressures. Today, the market is global, and people vote with their feet and pocket more often than not; there is even more opportunity to make ‘easy money’ in the food chain and it is not beyond the most unsophisticated individuals with criminal intent to sell products that are harmful to health whilst turning a tidy profit. For example, selling products that contain undeclared allergens, or banned ingredients.
- 1.2 There is also a move to more novel cooking techniques and methods, of which the risks to health are not fully understood by those that sell them. For example, undercooked burgers, pork and home style sous-vide, charcuterie and sushi are grown in popularity, but there is not pre-requisite requirements to set up a business and sell such products. Of course there still exist the traditional methods of cooking and preservation – another growing trend!
- 1.3 Issues still arise in relation to adulteration and examples in recent years have included the horsemeat scandal, fake alcohol with all the associated health effects and not a year goes by without preventable deaths being reported in the media.
- 1.4 The majority of food controls are European in origin and form part of the framework arrangements for the Single Market. There are still in place domestic controls relating to the nature, substance and quality of food as well as misleading labelling and advertising. This issue remains a very live one, and the impacts to imported food controls and exports will have a direct impact on the regulatory services PPP provides and the businesses it serves.
- 1.5 There is a range of legislation also designed to control the safety and handling of food as well as setting out the hygiene standards of premises. These give authorised officers a range of powers including issuing improvement notices through to closing premises by Hygiene Emergency Prohibition Notices and seizure and detention of food. Clearly such significant powers need to be exercised in a defined framework that includes competency requirements assessed annually and CPD requirements.
- 1.6 In recent times the health benefits and risks relating to food have come to the fore. Cardiovascular disease, certain cancers and obesity are often linked to food as a range of benefits in such as cholesterol reducing, health heart and brain functions and a whole range vitamin, mineral and food supplements. In recognition of this a new framework has been put in place to provide for clearer but more comprehensive labelling as well as approved health and nutrition claims. This combined with other specific labelling requirements relating to areas such as genetically modified, organic, geographical protections and irradiated foods allow for informed consumer choice. These are complicated areas of law and the officers that deliver many areas have to meet competence and CPD requirements.
- 1.7 The PPP also recognise compliance is achieved by working in a consistent fashion nudging and rewarding business to achieve compliance with the relevant regulatory framework. The PPP accepts the earned recognition in food standards work approach, the alternative enforcement strategy approaches in food hygiene, the primary authority principal, and has a

proud record of achievements for those businesses its regulates by subscribing to the Food Hygiene Rating Scheme (FHRS).

2. Supporting Information – Feed Control

- 2.1 Like food controls these have existed for a long time to govern the safety and composition of animal feeds. Over the years failures in these controls have led to a number of high profile issues which affect the PPP service. For example, salmonella in poultry and eggs, foot and mouth disease and most notably BSE and the links to vCJD. These failures led to health risk, injury to health and loss of life. They have also cost the economy Billions.
- 2.2 It is also recognised that farmed animals form part of the food chain and safety issues arising in animal feed can pass through to the food chain or indeed affect the health of the animals directly. Examples include dioxins and micotoxins.
- 2.3 Our work in this area extends beyond hygiene into quality of feed, labelling and contamination. Like food it is a specialised area of law and practice and one that the PPP has significant expertise in. So much so that we host regional officer who carries out visits to farms across Oxfordshire, Hampshire, Berkshire, Surrey and east and West Sussex. The Public Protection Manager is also a member and former Chair of the National Trading Standards Board - Feed Governance Group who deliver the strategy and managed the funding on behalf of the Food Standards Agency.

3. Concluding Comments

- 3.1 The area of Feed and Food Controls remains high profile and a high priority for the PPP. Safety, informed choice for consumers and fair competition between businesses are all important as is confidence in food business operators and products. On the latter point we have seen numerous occasions where loss of confidence has led to economic damage and loss of markets.
- 3.2 All of the PPP planned and reactive interventions in this field inform the national and international picture and it is necessary PPP remains a link in the farm to fork chain.

Officer details:

Name: George Lawrence
Job Title: Strategic Manager – Compliance and Enforcement
Tel No: 01635 519519
E-mail Address: George.lawrence@westberks.gov.uk

Document Control Information



Title:
Public Protection Partnership
OFFICIAL FEED AND FOOD CONTROLS SERVICE PLAN 2019- 2020

Version: 5

Classification: Internal, public

Author(s): George Lawrence – Strategic Manager for compliance and enforcement
Quality Assurance: Sean Murphy PPP Service Manager

version		
1	May 2019	George Lawrence
2		
3		
4		
Draft 5	May 2019	Paul Anstey review

It is a requirement that Local Authorities produce a Feed and Food service plan each year, the format of which is contained within the Framework Agreement on Official Feed and Food Control by Local Authorities.

Contents:

1.0 SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

1.2 Themes from the PPP

2.0 BACKGROUND

2.1 Profile & Organisational structure

2.2 Scope of the Feed and Food Service

2.3 Demands on the Feed and Food Service

2.4 Service Contact Details

2.5 Regulation Policy

3.0 SERVICE DELIVERY

3.1 Interventions at Food and Feeding stuffs establishments

3.2 Food and Feed Service Requests & Complaints

3.3 Primary Authority Scheme

3.4 Advice to Business

3.5 Feed and Food Sampling

3.6 Control and Investigation of Outbreaks and Food Related Infectious Diseases

3.7 Feed and Food Safety Incidents

3.8 Liaison with Other Organisations

3.9 Feed and Food Safety and Standards promotional work and other non-official controls and interventions

4.0 RESOURCES

4.1 Financial and Staffing Allocation

4.2 Staff Development Plan

5.0 QUALITY ASSESSMENT

5.1 Quality Assessment and Internal Monitoring

6.0 REVIEW

6.1 Review of Delivery Plan

6.2 Identification of Any Variation From the Delivery Plan

6.3 Areas of Improvement

APPENDIX

Appendix A – Relevant Officers

TABLES

Table 1: Proposed feed & food standards 2019-20 intervention programme

Table 2: Proposed food hygiene 2019 -20 intervention programme

Table 3: Estimated resources required for feed and food hygiene and standards programme

1.0 Aims and Objectives

1.1 Aims and Objectives

The annual feed and food law enforcement plan “the plan” is designed to deliver on the Public Protection Partnership (PPP) aims and priorities in respect of promoting and protecting health and supporting reputable businesses. This plan covers the local authority areas of Bracknell Forest, West Berkshire and Wokingham, and in accordance with the framework agreement on official feed and food law control service planning as set out by the Food Standards Agency (FSA). Specifically it sets out how these authorities regulate and protect the food chain from ‘farm to fork’ in respect of feed quality, food hygiene, food standards and labelling requirements.

The plan seeks to deliver a focussed approach through the successful use of information and intelligence and should be viewed in that context as PPP’s ambitions to deliver its services using principles adopted from the national intelligence model going forward.

It is the responsibility of feed and food business operators to ensure compliance with relevant standards. It is the role of the PPP to ensure that those businesses accountable for not meeting such standards are handled in a consistent and proportionate manner in order to meet the standard. Maintaining this approach provides consumers protections and allows consumers to make informed choices. The success of the PPP are managed using key performance indicators that align with requirements set out within the framework agreement on official feed and food controls.

The programme is structured to ensure it aligns with the overarching priorities set out by the inter authority agreement, and subsequently the PPP strategic assessment.

Key Objectives

- To ensure the PPP carry out planned inspections within higher risk feed and food businesses. This includes the provision of legal and practical advice at the time of the visit to improve compliance rates.
- To apply alternative interventions and approved strategies where lower risk premises are concerned, that are in line with relevant approved Codes of Practice E.g. Earned recognition and alternative enforcement strategy.

- Assess unrated and new premises to bring them into the risk based audit programme.
- By analyzing intelligence and information entering the service, identify where current hygiene & quality standards are not being met.
- To respond to customer complaints and requests for our service as well as requests for advice from businesses.
- In line with national priorities to ensure relevant approved premises, primary producers and feed business operators achieve compliance with the relevant feed and food hygiene requirements.
- To provide information to consumers to allow them to make informed choices.

1.2 Themes from the PPP

The relevant Public Protection Partnership themes (as stated in the workplan and developed in the priority documents) are:

- 1) Community Protection (including tackling the issues that cause the greatest harm to individuals)
- 2) Protecting and Improving Health (including allowing residents to make informed choices and delivering initiatives designed to improve and enhance health).
- 3) Supporting Prosperity and Economic Growth (including the provision of advice to businesses and protecting them from unfair trading).

2.0 Background

2.1 Profile & Organisational Structure

On 6th January 2017 Bracknell Forest Borough Council (BFBC), West Berkshire District Council (WBDC) and Wokingham Borough Council (WBC) entered into a joint service, inter authority agreement (IAA) for Trading Standards, Environmental Health and Licensing. This function is provided by the PPP and the food and feed functions fall under the remit of the Public Protection Manager. PPP governance arrangements have led to the PPP being directed by a separate committee of elected members representing of each authority who are advised by a Joint Management Board (JMB) made up of Senior Managers representing each authority.

The PPP serves a rising population of almost ½ million residents, comprising of around 120,000 (BFBC), 160,000 (WBDC) and 165,000 (WBC). Whilst the three authorities share many similarities such as the types of businesses, their more modern industrial and historic towns and villages, political governance, and health demography, each area is also unique. For example, major retail, shopping and leisure facilities within the Lexicon can be found within BFBC, higher density student living linked to Reading university and the highly attended Henley festival features within WBC. Within West Berkshire, rural landscapes, farming and horse racing are common place.

The service is undergoing a significant structural change, which affect the way in which delivery of feed, food hygiene and standards matters are carried out. 4 distinct functional areas – ‘Response’, ‘Programme delivery’, Compliance and Enforcement, and Case Management Unit’, with each having a role in protecting consumers from farm to fork.

2.2 Scope of the Feed and Food Service

The PPP has responsibility for the following areas of the feed and food chain:

- Ensuring the accuracy of food labels and descriptions that are applied to feed and food products;
- Ensuring claims made in the course of the marketing of food are accurate and legal;
- Ensuring feed and food hygiene and food standards are enforced appropriately;
- Ensuring Food Alerts relating to feed and food hygiene and food standards are acted upon in a proportionate and consistent manner;
- Ensuring standards are met at primary production (farms and growers) and approved premises;
- Ensuring feed hygiene and compositional required standards are met throughout the supply chain and on farm;
- Ensuring businesses are appropriately advised in line with the advice policy;
- Ensuring that consumers have the required knowledge base to make informed choices when purchasing feed or food;
- Ensuring complaints from consumers relating to feed or food issues are assessed and assigned to an officer for action and/or are recorded for intelligence purposes;
- Supporting local, regional and national programmes delivered by other relevant partners;

If appropriate, other relevant inspections or regulatory checks and assessments will be carried out at the time of the feed and food hygiene and food standards inspection. For example, product safety, licensing matters, weights & measures regulation, health, safety and welfare, living conditions and energy efficiency. This may also include wider cross cutting issues for PPP, such as immigration issues, modern day slavery and fraud. Such interventions are dependent on the premises type, risk assessment and resource levels available. PPP aims to target interventions at the most critical points within the most high risk areas based on the PPP strategic assessment.

2.3 Demands on the Feed and Food Service

The Service offers confidential and impartial advice for businesses within its area. This includes dealing with complex and technical enquiries (such as allergen, FHRs, FHMS systems, approved premises, feed composition and exportation of food stuffs) along with inspecting and monitoring activities; all of which are essential and significant proportions of the workload associated with feed and food service delivery. The 2019/20 strategic assessment identifies feed and food hygiene service delivery as one of its strategic priorities.

The Food Standards Agency has allowed local authorities to adopt a more flexible and varied approach in developing a suitable strategy to maintain compliance. As a result the PPP will continue to visit a number of high and medium risk food premises but look to alternative enforcement strategies to keep under review low and non-inspectable risk food premises. Audits and sampling will continue to be targeted at nationally or locally recognised areas of concern. Where there is a primary authority arrangements in place, officers will have regard to any inspection plan published.

Although changeable, the Partnership currently has approximately 3200 food businesses on its databases liable for food hygiene & food standards intervention. Local Authority Enforcement Monitoring (LAEM) provides a detailed snap-shot profile for feed and food hygiene matters in respect of the number, type, risk, locality, and so on. The LAEM returns are reliant on proper maintenance of database use and the PPP resources specialist officers to ensure database quality is maintained across the partnership. This is in addition to other 'back-office' support services that deliver the PPP model.

Food Standards

Of those 3200 premises, where food standards are concerned, around 50 are classified as high risk, 480 medium risk, and approximately 1290 are low risk. Approximately 500 are outside of the scope of the programme.

The remainder are made up of unrated premises. This presents the biggest challenge for the service as these need to be brought back into the audit programme. The 2019/20 priorities work-plan for PPP recognizes resources will need to go into this area of work to ensure those premises not yet risk assessed will need to be so, and as such this is included in the feed and food service plan.

Feeding Stuffs

In terms of feed premises there are 598 primary producers (including livestock farms) and 103 inland feed premises.

The risk rating for each premises is assessed at each visit and by reference to events such as levels of compliance, local risk and the category of individual businesses. In addition the service have regard to the principles of the Hampton Review, ensuring that no inspection is conducted without reason and local risk factoring is applied.

Food Hygiene

Higher risk premises in respect to hygiene account for around 5-10% of the total number of premises subject to intervention; the remainder would be considered to be broadly compliant. The 3 authorities have 14 local authority registered approved premises. All premises subject to inclusion within the food hygiene rating scheme are assessed and managed in accordance with the FHRS practice guidance.

Primary Authority

PPP have Primary and Home Authority responsibilities, which includes allocating time to our major food producers.

Currently, PPP have 3 arrangements in place relevant to the feed and food service; Prezzo, HiPP and Waitrose.

2.4 Service Contact Details

Email:

tsadvice@westberks.gov.uk or ehadvice@westberks.gov.uk

Telephone:

01635 519930 (Out of hours 01635 42161)

Located at:

Council Offices, Market Street, Newbury, Berkshire. RG14 5LD

Civic Offices, Shute End, Wokingham, Berkshire RG40 1WW.

Council Offices, Time Square, Market Street, Bracknell RG12 1JD

Opening hours are 9am-5pm Monday to Thursday and 9am to 4.30pm Friday.

2.5 Regulation Policy

The Enforcement policy for the Public Protection Partnership (PPP) comprises of:

- 1) The Regulators Code – this forms the guidelines that PPP uses for the basis for general enforcement work,
- 2) The Code for Crown Prosecutors – this forms the basis for decisions to prosecute in all criminal matters;

In the context of this policy, the PPP consists of those matters enforced by the Trading Standards, Environmental Health and Licensing Services.

For the Code for Crown Prosecutors see:

https://www.cps.gov.uk/sites/default/files/documents/publications/code_2013_accessible_english.pdf

Regulators Code:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf

3.0 Service Delivery

3.1 Interventions at Food and Feedingstuffs establishments

Each local authority is required by the Food Standards Agency's Codes of Practice to document, maintain and implement an interventions programme for those premises for which they have enforcement responsibility.

There is a risk based approach in relation to feed and food advice and enforcement. Resources dedicated to feed and food related activities are balanced against the demands of other regulatory activities. This risk based approach allows more intensive regulation to be directed at those businesses presenting the greatest risk.

Official controls include – inspection, audit, surveillance, verification, sampling and monitoring and other interventions which can effectively support businesses to achieve compliance with legislative requirements include – education, advice, information and intelligence gathering. The different interventions allow the authority to choose the most appropriate action to be taken to increase levels of compliance. This fits with the PPP model or service delivery using Prevention, Intelligence and Enforcement (PIE) principles.

We aim to carry out interventions to those premises in line with the Food Standards Agency profiling.

Where appropriate animal health Inspectors will carry out some of the feed hygiene and food standards inspections alongside their routine animal health visits. Carrying on with the same principles, food standards work will be carried out alongside food hygiene and licensing audits in similar and appropriate premises.

Table 1: Proposed Feed & Food Standards 2019-20 Intervention Programme.

Category	No of premises due (BFC)	No of premises due (WBDC)	No of premises due (WBC)	Total	Target/commentary
HIGH	17	13	15	45	100% delivery expected
MEDIUM	86	106	84	276	100% delivery expected
LOW	435	254	168	857	Inspections in response to complaints, request by the business or as part of identified projects.
UNRATED	-	600	348	948	Action plan to be introduced to address outstanding unrated list.
Inland Feed	2	11	6	19	100% delivery expected
Primary Production (feed)	1	3	2	6	100% delivery expected
Primary Production (food)	0	1	2	3	100% delivery expected
Regional Feed	Approximately 100 premises which are grant funded/shared outside of PPP. 100% expected.				

Table 2: Proposed Food Hygiene 2019-20 Intervention Programme.

Risk Category	A (2 visits required)	B	C	D	E	Unrated (predicted)	Target/commentary
Bracknell	0	18	109	84	179	173	75 % (Unrated) within 28 days of trading and 100% of expected higher risk premises.
West Berkshire	1(2)	31	149	188	171	167	75 % (Unrated) within 28 days of trading and 100% of expected higher risk premises
Wokingham	0	27	124	159	140	106	75 % (Unrated) within 28 days of trading and 100% of higher risk premises
TOTAL	1(2)	76	382	431	490	446	

Table 3: Estimated resources required for Feed and Food Hygiene & Food Standards programme.

Risk Rating	No. of Premises Due 2019-20	Estimated (hourly) time per intervention	Total
A/High	47	5	235
B/Medium	352	4	1408
C/Low	1239	3	3717
D (partial insp visit)	431	2	862
E (Alternative enforcement strategy)	490	2	980
New Premises/Unrated	446 (Hygiene) 948 (Standards)	3	4182
Inland Feed and Primary Production Inspections	128	3	384

The total time expected to deliver on all planned feed and food interventions would be in the order of 11768 hours.

3.2 Feed and Food Service Requests & Complaints

Food and feed complaints are investigated by the service in line with departmental procedures. In responding to complaints we aim to ensure that:

- appropriate action is taken as necessary under relevant legislation;
- feed and food is accurately labelled, advertised, wholesome and of the composition to meet legal standards;
- industry standards and best practice are promoted;
- new and existing business enquiries are responded to with appropriate levels of support and/or signposting.

It is assumed that the number of service requests associated with feed and food matters for 19/20 will be in line with previous years. This amounted to approximately 8-10% of the overall demand of service requests for PPP (which was approximately 12500 service requests).

3.3 Primary Authority Scheme

The concept of Primary Authority was formalised under the Regulatory Enforcement and Sanctions Act 2008. Under this legally recognised scheme (overseen by the Regulatory Delivery), any business operating across more than one Local Authority can form a legally recognised partnership, effectively creating a focus for consistent advice. It is the gateway to simpler, more successful local regulation, and previous changes to the scheme has meant a significant expansion to the range of businesses that can participate, to now include so-called 'Co-ordinated Partnerships', such as franchise operations, trade associations and other business groups.

We offer Primary Authority partnerships to businesses wishing to take advantage of the scheme.

Currently we are in a primary authority relationship with two food companies, Prezzo Ltd and HiPP UK Ltd, and these businesses currently require higher demands in relation to food hygiene as opposed to large food standards. This is primarily through inter-authority advice and preparation of inspection planning.

3.4 Advice to Business

As part of the PPP Model in service delivery, the Public Protection Partnership have implemented the principle of providing advice and information based on legislative requirements and recognised Codes of Practice. The newly created PPP website and response team, including support services will handle all the initial requests and triage accordingly. Not only will customer facing services be delivered in this way, officers pro-actively provide advice and guidance during the programmed inspection of premises.

Resources to deliver business advice are drawn from across the competent officers identified in the service.

The Public Protection Joint Committee has agreed to continue supporting the Home Authority Principle but that this work will become chargeable at the same rate as Primary Authority work. Small businesses will receive up to half an hour of free advice.

3.5 Feed and Food Sampling

The PPP recognises the important contribution targeted sampling makes to the protection of the food chain.

The PPP produces both its own annual sampling programme and contributes to local, regional and national programmes to establish the effectiveness of the management of food and feed standards in local businesses. Sampling is a way of testing the products integrity and endorse the effectiveness of any given management systems designed to ensure feed and food is safe, of correct composition and/or meets legal standards. Where evidence directs to poor management controls, or say deliberate adulteration and fraud, PPP will take action accordingly. The resilience within the PPP is sufficiently flexible to take account of any areas which require attention as they arise i.e. food incident warnings, consumer complaints.

Testing this year will include food supplements for unauthorised ingredients and non-permitted health claims, vehicles for potential cross contamination, identifying local on line sellers and bringing them into compliance, as well as looking at a range of issues such as allergen control and meat and fish speciation.

We anticipate this will translate to approximately 100 food and feed samples being taken in the next financial year.

3.6 Control and investigation of outbreaks and food related infectious diseases

The PPP responds to notifications of infectious disease which can be highly damaging to both individuals and the reputation of a business if implicated. Reports might be based on sporadic cases or outbreaks. Where notifications are received from the Health Protection Unit of Public Health England, the PPP investigates as necessary. More serious cases are led by the Consultant in

Communicable Disease Control and the PPP routinely form part of any outbreak team where outbreaks occur in its area, or are linked to feed and food production within its areas.

Like any investigation, the purpose of investigating infectious disease is to isolate the source and control the spread by taking appropriate action where the legal standards have not been met.

There is a Joint Infectious Disease Incident Plan for Berkshire in place that was produced in conjunction with the Health Protection Unit which can be activated on a 24 hour basis for larger and/or cross boundary matters.

Campylobacter makes up the vast majority of reported cases received, (around 85%) which is in line with the nationally understood profile. The number of incidents of all infectious diseases reported is very similar across the 3 authorities, and the PPP can expect around 800 notifications throughout the year across the three areas.

3.7 Feed and Food Safety Incidents

Food and Feed Alerts are issued by the Food Standards Agency (FSA) to all Food Authorities in the country when a national food or feed safety issue has arisen with a specific product.

Alerts are responded to as directed by the warning notification received from the FSA and in accordance with the Code of Practice.

All warnings are received by email and any subsequent action taken is recorded and retained on file.

3.8 Liaison with Other Organisations

We work closely with a number of organisations and to avoid duplication of effort we have clear guidelines on who is responsible for what.

Partners include:

- Trading Standards South East Limited (TSSEL);
- Feed and Food related working focus groups across the Thames Valley and South East;
- National feed programmes across neighbouring areas delivered on behalf of the FSA;

- Public Health Teams to deliver healthy eating initiatives and alcohol reduction;
- Schools for the delivery of the nutrition education programme (Key Stage 1 and 2);
- National Agency's where cross cutting issues are identified such as the Food Standards Agency, Environment Agency, Police, Social services and Educational establishments;
- Members of Bracknell, West Berkshire and Wokingham Councils on PPP Workplan and Priorities;
- The Public Protection Manager is a member of the National Feed Governance Group on behalf of National Trading Standards.

3.9 Feed and Food Safety and Standards promotional work and other non-official Controls and Interventions

The principles of Prevention, Intelligence and Enforcement (PIE) are applied to this plan. The promotion of food standards and feed safety will be achieved through local initiatives, publicity and by supporting national initiatives. The PPP will aim to deliver through its programme delivery a number of projects including:

- Contributing to the wider public health agenda through the promotion of healthier eating options;
- Raise awareness of food issues to local food businesses and residents;
- Maintain endorsement of the Food Hygiene Rating Scheme;
- Provide advice to local business at the time of routine visits about upcoming changes to legislation, with specific focus on allergens and on-line sales;
- Ensure that the effectiveness of promotional activities are evaluated via feedback from businesses and the public;
- Make use of the many guidance leaflets for business on feed and food topics. For example, those that are available to download from www.businesscompanion.info and from the FSA;
- Implement the PPP communication strategy and further develop the PPP website and use of social media potential;

- Attendance to community fairs to promote the work of the PPP.

4.0 Resources

4.1 Financial and Staffing Allocation

Our primary resources are our staff. There are some 100 staff operating across the PPP within the 4 functional areas. The resources at the PPP disposal are diverse and range from support officers with administrative, intelligence and analytical database skills, trading standards officers, sampling officers, specialist in feed and food hygiene officers (e.g. approved premises, animal health), food safety officers, environmental health officers, solicitors, and a technically qualified leadership and management team.

Clearly, not all staff are dedicated to delivering solely on feed and food hygiene and standards. However, all play a part in its delivery. The delivery programme ensures services are carried out by officers with the correct levels of qualification, skills and expertise, as set out in the Practice guidance on official controls.

There is little scope at present to recover costs associated with such planned activity. However, the FSA provide a small grant fund, around £12k for the delivery of regional feed inspections. The PPP also recover costs for its primary authority role and specifically in relation to its commitments to Waitrose and Prezzo. The PPP also place a charge for export certification on request. This amounts to a further approximation of £15.5k per annum. There is a £20k sampling budget from the PPP.

4.2 Staff Development Plan

The PPP have always supported learning and development within its disciplines. This ethos being expanded to ensure future proofing and expansion of technical skills that allow the service plan to become more accessible to colleagues within the partnership. The PPP also encourages staff development and building on core qualifications using structured annual appraisals, audit of skills and regular one to one meetings.

The PPP Joint Management Team have developed, and recruited, a new lead officer role responsible for building on an already established skills framework (as set out by the FSA) to ensure competency amongst staff involved in service delivery is maintained and embedded across all of the PPP. This will incorporate better use and understanding of systems database, and application of regulatory skills and legal processes aimed at minimising risk to prosecution cases. This will also include maintaining minimum continued professional development i.e. at least 10 hours in core subject area, and no less than 20 hours overall annually.

5.0 Quality Assessment

5.1 Quality assessment and internal monitoring

The PPP have the resource in place to ensure:

- Regular Internal audit and monitoring of database quality across the three case management systems;
- Performance targets within the Governance arrangements, which in turn support many of the service delivery ambitions within the plan. For example, customer business satisfaction;
- Qualified and competent senior investigating officers assisting investigators preparing files for prosecution;
- A system of ensuring calibration and maintenance for relevant recording equipment. For example, annual thermometer equipment calibration;
- A growing quality management systems specific to feed and food matters, including an enforcement manual;
- Ensuring sample analysis is carried out only by laboratories that are accredited and appointed for the purpose of the various statutes; and
- Established target setting through 1;1's and appraisals.

6.0 Review

6.1 Review of Delivery Plan

The PPP will review the plan, at the end of the financial year, as part of the overall service planning process to ensure it continues to meet the needs of our customers.

6.2 Identification of any variation from the Delivery Plan

Variations from the plan will be reviewed at regular tasking meetings with management. Variances will be documented. If changes are made they would be subject to final agreement by the Public Protection Manager under delegated authority.

6.3 Areas of Improvement

Areas for improvement are incorporated into the following year's objectives, or dealt with as soon as possible if there are no additional financial implications. Identified areas include:

- Ensuring that intelligence reports from sources such as the FSA direct our audit and intervention programme;
- Continue to improve the quality of data management by committing to a single database;
- Ensure any new system is in line with GDPR rules and recognised industry standards for the protection of all PPP stakeholders;
- Improve and promote communications by reviewing and implementing the PPP communication strategy;
- Ensure robust contingency planning by reviewing the PPP plans concerning emergency planning and business continuity;
- Prioritising potential High and Medium risk along with new unrated premises;
- Develop further a documented process / procedure for the internal monitoring in line with the Code of Practice; and
- To revisit how the delivery of the PPP model can be better applied in delivering services to all stakeholders signed up to the inter authority agreement, and improve accordingly.

APPENDIX: Relevant Officers

[Link to structure chart.](#)

This page is intentionally left blank

Public Protection Partnership Official Feed and Food Controls Service Plan 2019-2020 – Summary

1. Feed and Food Service Delivery

Scope – Compliance and enforcement of feed, food hygiene and food standards matters falls within the remit of the Public Protection Partnership (PPP). The service also has a number of Primary Authority arrangements that fall within Food and Feed regulation. For example, Waitrose, Prezzo and HiPP.

Priority – Priorities for the service are set against the context of the PPP strategic assessment and associated controls (work plans). Decision making is based upon risk, and informed by using the principles formed out of the national intelligence model.

Investigations into serious breaches of feed and food related legislation, audit and inspection of high risk premises is modelled using the Food Standards Agency (FSA) risk rating and /or where serious public health breaches are known are given priority.

Resource – there are a number of officers within PPP who are able to carry out investigations, audit, intervention and inspection. The resources required for the 19/20 programme to deliver on the plan against the basic level of compliance interventions equates to almost 12,000 hours of officer time. (for example, this would not account for any follow-up actions such as formal notices, compliance re-visit and prosecutions).

Marginal resource costs offset is achieved through cost recovery from sources such as primary authority role, grant funding & export certification charges. This equates to around £24 000.

Programmed Work - There is no pre-requisite for operating a food business other than registration. There are close to 3,200 food businesses across the three authorities at any given time, and the authority's understanding of how frequent an establishment requires an inspection is based largely on the initial contact, intelligence and inspection of the business premises. Each premises will have its own risk profile generated based on factors such as management arrangements, structure, product type and scale of business – all of which determines the subsequent frequency and type of intervention required.

In the 2019/20 inspection year, around 4000 interventions across the regulatory field of feed, food hygiene and food standards official controls are due (or required) in order to review the existing profile and/or create a profile. The known lowest risk premises are permitted under the Food Law Code of Practice to be subject to alternative enforcement in the form of a food hygiene questionnaire. There is also earned recognition (light touch) for low risk premises regulated for food standards matters.

Planned inspections of premises are based on current risk assessment criteria set by Food Standards Agency Code of Practice.

In terms of programmed inspection work within the Food and Feed service delivery plan, there is an appreciation of the wider context in delivering associated activity based upon risk. These services include;

- Quality Management System procedure updates
- Planned Work Activity linked to cross cutting and food related matters
- Reactive infectious disease investigations

- Regulatory requirements relating to licensable activity
- Regulatory requirements concerned with private water supplies
- Retaining delivery of the Food Hygiene Rating Scheme
- Food and Feed related (e-crime) investigations
- Nutritional Public Health Schemes, E.g. Eat Out Eat Well
- Local, regional and National sampling programmes
- Quality monitoring and competency assessments of relevant officers

Proposed JPPC performance indicators

These will be reported quarterly in 2019-20 and in line with the PPP performance indicators and are broadly the same as previous years.

Broadly Compliant - describes the % of the food premises that have 'some non-compliances' for food hygiene and for structure (and cleaning) and are at least 'satisfactory' in terms of confidence in management. They are not fully compliant premises and may still have food hygiene contraventions on inspection. **TARGET = 90%**

High Risk Premises Inspections in year – This would be defined as those premises that present the greatest risks to the consumers and are due a least one inspection in-year, and line with the CoP frequency of inspection risk programme. This would include all primary production feed and food premises, approved premises as well as premises that would be classified as A & B (for hygiene), or 'High' for food standards and those which are not broadly compliant. **TARGET = 100%**

New Premises inspection within 28 days - New food premises will receive their initial inspection within 28 days of trading commencement where the business has notified us of opening by Registering as a food business. This is so that new businesses are given the assistance they need at an early date to make them aware of their responsibilities and to ensure food premises across the Boroughs prepare and serve food that is safe to eat. It also promotes ensures a level playing field for all food businesses and promotes economic growth. **TARGET = 75%**

Officer details:

Name: George Lawrence
Job Title: Strategic Manager – Compliance and Enforcement
Tel No: 01635 519163
E-mail Address: george.lawrence@westberks.gov.uk
