

Notice of Meeting

Joint Public Protection Committee

A shared service provided by Bracknell Forest Council
and West Berkshire Council

Monday 2 October 2023 at 7.00pm

Venue: Council Chamber Council Offices Market Street
Newbury

Note: This meeting will be streamed live here:

<https://www.westberks.gov.uk/jointpublicprotectioncommitteelive>

To: Councillors Lee Dillon (Chairman) (West Berkshire Council), Kandy Jefferies (Vice-Chairman) (Bracknell Forest Council), Neil Allen (Bracknell Forest Council), Phil Barnett (West Berkshire Council), Guy Gillbe (Bracknell Forest Council) and Howard Woollaston (West Berkshire Council)

Part I

	Page No.
1 Apologies To receive any apologies for absence.	1 - 2
2 Minutes To approve as a correct record the Minutes of the meeting of this Committee held on 12 June 2023.	3 - 4
3 Outstanding Actions from Previous Meetings To consider any outstanding matters from previous meetings.	
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.	5 - 6

Public Protection Partnership Agenda - Monday, 2 October 2023 *(continued)*

5 Notice of Public Speaking and Questions 7 - 8

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 Forward Plan 9 - 12

To detail future items that the Committee will be considering.

Items to Execute Council Functions

7 Public Protection Partnership Service Update and Q1 Report for 2023/24 (JPPC4251) 13 - 46

To inform the Committee of the performance of the Public Protection Partnership in line with the operating model and business plan and provide an update setting out performance during the first quarter of 2023/24.

8 PPPs Approach to Age Restricted Products (JPPC4366) 47 - 58

To set out an updated Enforcement Approach to Age Restricted Products 2023-2025 policy and invite the Committee to consider, amend and/or adopt the Policy.

9 Tackling Fraud and Unfair Trading 59 - 102

To provide the Committee with an update on the work of the Public Protection Service in tackling fraud and financial abuse.

Item to Execute Executive Functions

10 **Revenue Budget 2024/25 including Proposed Fees and Charges Schedule (JPPC4252)** 103 - 130

To set out the Public Protection Partnership's (PPP) draft revenue budget for 2024/25, including discretionary fees and charges for 2024/25.

To seek approval for the draft budget and draft fees and charges schedule prior to submission to Bracknell Forest and West Berkshire Councils as part of their budget setting process in accordance with the Inter-Authority Agreement (IAA).

To agree the figure for the basis of the recharge to Wokingham Borough Council with respect to the services jointly Wokingham Borough Council under the shared service agreement effective on the 1st April 2022.

Contact Officer:

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JPPC – 2 October 2023

Item 1 – Apologies for absence

Verbal Item

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JPPC – 2 October 2023

Item 2 – Minutes

Item 3 – Outstanding actions from previous meetings

Documents to follow

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Item 4 – Declarations of Interest

Verbal Item

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JPPC – 2 October 2023

Item 5 – Public Speaking and Questions

Verbal Item

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JPPC Forward Plan December 2023 to December 2024

No.	Ref No	Item	Purpose	Lead Officer	Comments
JPPC 11 December 2023 – BFC					
1.	JPPC4275	Public Protection Partnership Q2 2023/24 Performance Report	To consider the Quarter 2 Update and Performance Report.	Sean Murphy/Moira Fraser	
2.	JPPC4277	PPP Delivery Plan Update 2023-2025	To set out progress has been made against the PPPs agreed priorities as set out in the 2021 to 2023 Delivery Plan.	Sean Murphy & Strategic Managers	
3.	JPPC4278	Air Quality Status Reports	To set out the response received from DEFRA.	Suzanne McLaughlin	
4.		Budget 2023/24	To report the level of shortfall in the budget and the mitigation measures proposed to reach a balanced budget.	Sean Murphy	
5.		Supporting Vulnerable Residents Update	To provide Members with an update on the work the Service is undertaking to protect vulnerable residents.	Philippa Collings/Sean Murphy	
JPPC 11 March 2024 – WBC					
6.	JPPC4333	Public Protection Partnership Q3 2023/24 Performance Report	To consider the Quarter 3 Update and Performance Report.	Sean Murphy/Moira Fraser	
7.	JPPC4334	Public Protection Partnership Priorities 2024/25 to 2026/27.	To consider and if appropriate amend the priorities for the partnership over the next three years.	Sean Murphy/Damian James	
8.	JPPC4335	Water Safety Partnership	To provide an annual update of the work of the Partnership.	Jon Winstanley	
9.		Nuisance Policy	To adopt a policy.	Suzanne McLaughlin	

No.	Ref No	Item	Purpose	Lead Officer	Comments
10.	JPPC4368	Service Plan 2024/25	To identify the relevant details of the Inter Authority Agreement (IAA) and sets out how the PPP intends to operate through the delivery of the Service Plan	Sean Murphy & Strategic Managers	
JPPC 10 June 2024 – BFC (date TBC)					
11.	JPPC4369	Election of the Chairman and Appointment of the Vice-Chairman for the 2024/25 Municipal Year.	To elect a Chairman from West Berkshire Council and a Vice-Chairman from Bracknell Forest Council for the 2024/25 Municipal Year, if necessary.	Verbal Item	
12.	JPPC4370	JPPC Terms of Reference	To note the terms of reference of the Committee.	Moira Fraser	
13.	JPPC4371	Public Protection Partnership Q4 2023/24 Performance Report	To consider the Quarter 4 Update and Performance Report.	Sean Murphy/ Moira Fraser	
14.	JPPC4372	PPP Strategic Assessment 2024 - 2027	To review and where appropriate update the existing document.	George Lawrence	
JPPC 7 October 2024 – WBC (Date TBC)					
15.	Form submitted	Public Protection Partnership Q1 2024/25 Performance Report	To consider the Quarter 1 Update and Performance Report.	Moira Fraser	
16.	Form submitted	Revenue Budget 2025/26 Including Proposed Fees and Charges Schedule	To set out the draft revenue budget for 2024/25 including fees and charges and to seek approval for the draft budget and draft fees and charges schedule prior to submission to Bracknell and West Berkshire Councils in accordance with the Inter-Authority Agreement (IAA).	Sean Murphy	
17.		Tackling Fraud and Unfair Trading	To provide the Committee with an update on the work of the Public Protection Service in tackling fraud and financial abuse.	Alison Beynon/ Theresa Bashford	Provided this annual report is agreed at the October 2023 meeting

No.	Ref No	Item	Purpose	Lead Officer	Comments
JPPC 10 December 2024 – BFC (Date TBC)					
18.		Public Protection Partnership Q2 2024/25 Performance Report	To consider the Quarter 2 Update and Performance Report.	Sean Murphy/Moira Fraser	
19.		Air Quality Status Reports	To set out the response received from DEFRA	Suzanne McLaughlin	

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Public Protection Partnership Service Update and Q1 Report for 2023/24

Committee considering report:	Joint Public Protection Committee
Date of Committee:	2 October 2023
Chair of Committee:	Councillor Lee Dillon
Date JMB agreed report:	11 September 2023
Report Author:	Sean Murphy
Forward Plan Ref:	JPPC4251

1. Purpose of the Report

- 1.1 To inform the Committee of the performance of the Public Protection Partnership in line with the operating model and business plan and provide an update setting out performance during the first quarter of 2023/24.

2. Recommendations

The Committee:

- 2.1 **NOTES** the 2023/24 Q1 performance for the Public Protection Service.
- 2.2 **NOTES** the Service Update since the last meeting.

3. Implications and Impact Assessment

Implication	Commentary
Financial:	<p>The service is currently predicting an end of year underspend of around £200K. This has arisen due to a number of factors including the carry-forward of 2022/23 underspend and vacancies in year.</p> <p>As both councils have in-year pressures and the outturn is reviewed monthly with a view to allocating any under-spend to mitigate in year pressures being faced by the partners the expected end of year outturn is therefore zero.</p> <p>The service has a predicted an income shortfall of £140K in 2023/24. This is also being mitigated by vacancies in licensing and other areas of the service combined with reduced spend on agency staff.</p> <p>West Berkshire currently has strict controls in place where expenditure is incurred and is focused on the delivery of essential services only and these include restrictions on agency spend, recruitment and overtime.</p>

<p>Human Resource:</p>	<p>Clearly the combination of vacancies and restrictions on the use of agency staff has the risk of increasing pressure on existing staff. We are constantly reviewing the service to ensure that resource is targeted in high priority areas and areas where there is greater risk of detriment to residents. There is some engagement of agency staff, but this is linked primarily to grant funding where there is not the resource to conduct the work e.g., level 3 investigation work and private sector housing work.</p> <p>A great deal of effort has gone into re-balancing the service through the delivery of a workforce strategy focussed on a 'grow our own' ethos by investing in apprenticeships, post graduate professional qualifications and post-entry training for both new and existing officers. This workforce strategy is underpinned by the Training and Development Plan.</p> <p>We have had some success in terms of recruitment to business-critical areas and these are set out in the body of this report.</p>
<p>Legal:</p>	<p>There are no direct legal implications arising from this report. The Inter-Authority Agreement (IAA) charges the Joint Public Protection Committee with the responsibility to oversee service delivery and performance including financial performance. This report discharges this responsibility.</p> <p>Following a recommendation that was made at the 12 June 2023 meeting the necessary constitutional processes (through each Council and Executive) have been completed with the effect of increasing the membership from two to three Elected Members from each partner authority. These changes will be reflected in the IAA.</p>
<p>Risk Management:</p>	<p>We will continue to manage risk in line with the prevailing situation and corporate policies. The service maintains both a strategic and operational risk register.</p> <p>The strategic risk register is regularly scrutinised by the Joint Management Board (JMB) which meets fortnightly. The JMB considers the red risk action plans at these meetings.</p> <p>The operational risk register is routinely monitored by the Principal Policy Officer Group with concerns being escalated to the Joint Management Team.</p> <p>The first critical risk currently facing the service is the failure to retain or recruit business critical staff which would result in the Service being unable to fulfil our statutory obligations. This risk is being managed through the carefully executed workforce strategy.</p>

	The second critical issue is budget in respect of the loss of income and the legacy finance issues arising from the decision by Wokingham BC to leave the shared service.			
Property:	There are no direct property implications arising from this report although it is to be noted that the 'Transformation Programme' at West Berkshire is looking at rationalising the use of the estate. This may have an impact on the PPP use of Theale Gateway.			
Policy:	<p>There are no direct policy implications arising from this paper. It should be noted that the Inter-Authority Agreement (IAA) places a responsibility on the Joint Public Protection Committee (JPPC) to determine service policies and priorities and to maintain oversight of performance. This report addresses that requirement by setting out the current performance levels and the approach to ongoing service recovery.</p> <p>The revised service priorities were agreed at the March 2023 JPPC meeting. The Delivery Plan 2023 to 2025 will be agreed at the December 2023 JPPC meeting which will assist with monitoring progress against the priorities whilst providing context about how the priorities are being delivered on a day-to-day basis.</p>			
	Positive	Neutral	Negative	Commentary
Equalities Impact:				
A Are there any aspects of the proposed decision, including how it is delivered or accessed, that could impact on inequality?		✓		No implications
B Will the proposed decision have an impact upon the lives of people with protected characteristics, including employees and service users?		✓		No implications
Environmental Impact:	✓			It is anticipated that the revised ways of working will continue to deliver reductions in travel for the team.

			In addition one of the aims of the Partnership is to deliver better outcomes, including environmental ones, for people living and working in Bracknell Forest and West Berkshire
Health Impact:	✓		The proposals create no direct health impacts on staff. They do however set out progress against community-based health protection measures and initiatives.
ICT or Digital Services Impact:	✓		<p>The use of ICT on service delivery has been transformational. Telephone conferencing, MS Teams and Zoom continue to be employed in the day today running of the service.</p> <p>The JPPC will continue to meet in accordance with the decisions made by West Berkshire Council, as the host authority, about meeting arrangements. The Licensing Committees will be conducted under the meeting arrangements of their individual authorities.</p> <p>The Service will continue to make use of the website, and social media platforms to improve the customer journey and keep residents and businesses informed.</p>
PPP Priorities :	✓		<p>This information sets out how the Service has maximised the use of resources to deliver against all the JPPC priorities as set out below:</p> <ol style="list-style-type: none"> 1. Alcohol and Tobacco Harm Reduction 2. Animal Welfare 3. Cost of Living 4. Environmental Protection 5. Food Safety and Standards 6. Health and Safety Enforcement 7. Housing Standards in the Private Rental Sector 8. Impact of Nuisance on Residents and Communities 9. Improved Air Quality 10. Licensing 11. Nutrition and Childhood Obesity 12. Service Improvement 13. Tackling Fraud 14. Unsafe Consumer Goods
Data Impact:		✓	None

Consultation and Engagement:	There is regular engagement with staff as well as senior officer and Member briefings in each of the authorities that form the PPP.
Other Options Considered:	None. It is a requirement of the IAA to report on the performance of the service.

4. Constitutional and Policy Position

- 4.1 At its meeting in June 2023 the Committee resolved to request that the partner Councils consider amending the Inter-Authority Agreement and Terms of Reference of the Committee to expand the membership to three Members from each Council. This has now been considered by both Council and Executive in Bracknell Forest and West Berkshire and consequently two new Members have been nominated, namely, Councillor Nick Allen for Bracknell Forest and Councillor Howard Woollaston for West Berkshire. West Berkshire Council's Constitution has been amended to reflect these changes.
- 4.2 The Committee is mandated by the Inter-Authority Agreement (IAA) to keep under review the performance and activity of the Public Protection Service including the financial performance and outputs of the service. Throughout the year the Committee receives updates on aspects of performance and any emerging issues, achievements, and priorities. This report also sets out progress and risks in key strategic areas of the business i.e., Finance, HR, ICT, Property and Legal.
- 4.3 The summarised Quarter 1 (April to June) performance data is set out in **Appendix A** to the report. Some data is unavailable due to ongoing issues with the systems transition but will be provided in December.

5. Finances and Resources

- 5.4 As at the 31st August 2023 the Service is reporting a zero outturn which includes management of an estimated £140K shortfall in income which has arisen primarily in the licensing service.
- 5.5 The service continues to seek to access grant funding. In the year to date the service has made successful grant funding applications exceeding £300K for level 2 and 3 investigations. These grants pay for expert witnesses, some staff costs, agency costs and legal costs. We are also accessing a range of public health funding relating to housing standards and links to health, tobacco and alcohol control including the development of Community Alcohol Partnerships. Other grant funding sources relate to supporting scam (fraud) victims with interventions to reduce the risk of harm and detriment. Some examples of this work can be found elsewhere in this report and on this agenda.
- 5.6 The 2024/25 revenue budget and fees and charges proposals are the subject of a separate report to be found on this agenda.

6. Customer Satisfaction Rates, FOI's etc.

- 6.1 The Service has been looking at several ways to improve data capture on customer satisfaction for businesses and residents interacting with the service. All

documentation now issued by the service has a QR code that links to a short on-line survey.

- 6.2 During Q1 87% of respondents to these surveys confirmed that that they were fairly, very or exceptionally satisfied with the service that they had received.
- 6.3 During Q1 the team dealt with a total of 89* Freedom of Information requests which took around sixty hours to process. The number of requests increased by around 20% when compared to the same period in 2022/23 where 74 Fols were processed. The team also processed 40 enquiries from Councillors and the local MPs. This represented a significant increase when compared to the 14 (185% increase) that were dealt with in Quarter 1 of the previous year.
- 6.4 Seven service complaints were received. This is the same number of complaints processed during the same period of 2022/23. This amounts to 0.17% of the total number of service requests that were received.
- 6.5 Quarter 1 Data for Past 4 years (Wokingham Data Removed for Comparator Purposes):

	2020/21	2021/22	2022/23	2023/24
Fols	63 (46 Hrs)	79 (64 hrs)	74 (62 hrs)	86 (59 hrs)
MP/Cllr Enquiries	17	32	13	40
Complaints	9	13	7	7

7. Human Resources:

- Since the last meeting of the JPPC we have successfully recruited to two long standing vacancies in the Investigations Team. The two experienced ex-detectives will support trading standards colleagues on complex fraud and unfair trading matters as well as assisting in other areas of investigations across the service.
- The Community and Trading Standards Team have recruited a part time Trading Standards Officer. A more recent advertisement for Trading Standards Officers received no suitable applications.
- In the Housing Team we have recruited a Graduate Environmental Health Officer to a long standing EHO vacancy.
- In Licensing, where we have been running with significant vacancies for a protracted period, we have recruited 2.6 FTE Licensing Officers one of which has started and two start in October. This will significantly reduce our reliance on agency staff in this area.

7.1 The key training and development updates are:

- A whole service meeting was held on the 19 September 2023 based around a children and young people safeguarding theme. The Service has four additional areas of mandatory training which includes safeguarding and this training tends to be delivered at the whole service meetings.
- A series of bespoke training sessions around personal safety were arranged for staff and delivered by West Berkshire Council's Health and Safety Advisor.
- Our mediation service (RESOLVE) has delivered a series of conflict resolution training courses for frontline officers.

- Two existing Trading Standards colleagues have commenced their Level 6 Trading Standards Apprenticeship funded through the Apprenticeship Levy.
- We have successfully, tendered for and awarded a contract to deliver the Level 6 Environment Health Apprenticeship and one officer has now commenced the training.
- Two Senior Environmental Control Officers will shortly commence post graduate Environmental Health qualifications.
- Pradip Randeria – Environmental Control Officer has completed his CIEH HHSRS Assessment (Housing Health and Safety Rating System) which means he is now qualified to carry out HHSRS assessments at properties.
- John Stowe - Environmental Health Officers has completed his BTEC Level 7 Advanced Professional Certification in Investigative Practice.
- One of our Environment Control Officers completed a re-accreditation in Private Water Supply inspection works.
- Allyson Bartram – Trading Standards Officer and Accredited Financial Investigator received her final accreditation by the National Crime Agency to conduct confiscation investigations under the Proceeds of Crime Act 2002.
- Five colleagues are studying for a CILEX qualification on criminal disclosure.

8. ICT

- 8.1 The implementation of the 'single system' for PPP is still presenting challenges. Many aspects of the system are now functioning well however, there are a range of issues with respect to the licensing elements of the system.
- 8.2 The transfer of the Wokingham Trading Standards data was completed successfully and all three connectors to the Citizens Advice Consumer portal are now functioning correctly.
- 8.3 The legacy systems in both West Berkshire and Bracknell are in the process of being replaced and we are working with the relevant teams to ensure that any historical records that need to be kept by the authorities are identified and retained in an appropriate form.

9. Property

- 9.1 The key property highlights are as follows:
- West Berkshire is conducting a review of the use its estate as part of the ongoing transformation programme. As part of that review the use of Theale Gateway is being considered.
 - Property (evidence) storage is also being considered with a long-term demand for increased storage capacity particularly around larger-scale seizures of counterfeit goods.

10. Operational Delivery – Measures of Volume

- 10.1 The key measures of volume data are set out in Appendix A to this report and the key highlights in terms of team activity is set out below.

11. Communication and Engagement

11.1 Since the last report to Committee:

- Officers have dealt with four press enquiries and the PPP has been mentioned in numerous online articles and multiple print articles. This has also included national press coverage following a recent court case.
- Officers have issued six press releases and conducted one radio interview in May on BBC Radio Berkshire relating to - iSpooof fraud and other banking scams.

Target	2022/2023 Outturn	Q1
Facebook – No of New Followers *	265	47
Facebook – No of Posts	358	101
Twitter – No of New Followers	29	0
Twitter – No of Tweets	311	58
Website – No of Visits	88,872	22307
Website – No of Articles	110	15

11.2 In line with the communication strategy we have sought verification to join the NextDoor platform which we feel would be a very useful communication route from many aspects of our work – especially around scams, fraud, rogue trader activity as well as community matters such as housing, dog fouling and enviro crime.

11.3 During Q1 Year the service worked with colleagues from Thames Valley Police and the Royal Berkshire Fire and Rescue Service to support Water Safety Partnership events as set out below:

- Sunday, 21st May Victoria Park, Newbury
- Saturday, 10th June Pangbourne Meadows, Pangbourne

11.4 Further events attended in Q2 as follows:

- 26th July – Warfield Family Fun Day
- 10th August – Winkfield Family Fun Day
- 24th August – Binfield Family Fun Day

11.5 Officers ran alcohol harm reduction sessions at the college during the last week of June and sessions on vaping at St Bartholomew's School and Denefield School.

11.6 Offices finalised their fifteenth [PHSE4You podcast](#) towards the end of June which focussed on money including the cost of living crisis and the local help and support of groups such as Loose Ends, The Soup Kitchen, The Community Larder and The Food Bank, as well as assistance offered by West Berkshire Council. This series of podcasts cover a range of subjects including vaping, mental health, alcohol, sleep and nutrition which are used to assist with personal, social, health and economic

(PHSE) education in our schools. These podcasts are designed for school and wider viewing.

- 11.7 The annual schools attitudinal survey (smoking and drinking patterns among young people) was completed on the 20th July. The outcome of the survey report was provided to schools and tobacco control partners in August and is being added to our PPP website.
- 11.8 At the end of Q1 we had 19 amateur clubs signed up to the Smokefree Sidelines project and the interim report was presented to the Tobacco Control Alliance at their June quarterly meeting.
- 11.9 We now have around 100 larder users at the Thatcham Community Larder which meets on a Wednesday afternoon. You can read more about the larder on their Facebook page: <https://www.facebook.com/groups/391249158661742>
- 11.10 The Communications Lead at PPP continues to work closely with West Berkshire and Bracknell Forest communication teams and liaises with them on a regular basis regarding our campaigns. For example, the Water Safety Partnership in West Berkshire and Bracknell and the anti-fly tipping campaigns in Bracknell Forest. We also share our press releases for their distribution, as well as both continuing to share relevant posts on each other's social media platforms.

12. Community and Trading Standards (including Customer Services)

- 12.1 The following is a summary of some of the work undertaken by the Community and Trading Standards Team:
- Both Trading Standards Officers and Community Environmental Health Officers continue to react to 'business as usual' (BaU) service complaints, as well as planned work. The number of service requests are set out in the performance update at **Appendix A**.
 - Of note, officers have dealt with a high number (247) of abandoned vehicles reports in Bracknell Forest during Q1. The vast majority of which were not actually abandoned due to having MoT and/or taxation and not being parked for any significant length of time. For those that were abandoned, officers worked with partners to remove them. We are now looking at how to improve reporting and awareness raising to reduce the number of reports where vehicles are not abandoned.
 - Although, not the statutory undertaker, officers used mediation skills in seeking a satisfactory public health resolution working with Thames Water over a flooding/sewerage matter in the Sandhurst area.
 - Several statutory notices have been issued on a range of issues including pest control enforcement, domestic noise nuisance and preventative public health works on filthy premises.
 - Occasionally, cases between disputing neighbours require a form of [mediation](#) where enforcement is not an appropriate course of action to resolve the issue. During Q1, nine cases have been referred to our independent mediation

service, two of which have been closed successfully with mutual agreements in place, and the remaining seven continue in positive dialogue.

- Quarter 1 was relatively quiet for abandoned dogs, but as the service moves into quarter 2, there appears to be an increase in both stray dogs, and (dangerous) stray dogs which are unsuitable for rehoming.
- The Animal Warden Service was recently re-awarded the prestigious Platinum RSPCA paw print award. [PPP Animal Warden Team celebrates another year of been awarded a prestigious RSPCA PawPrints award - PPP \(publicprotectionpartnership.org.uk\)](https://www.publicprotectionpartnership.org.uk)
- A long-standing high hedge dispute has finally been resolved, with the works eventually being carried out by the local authority in default, and full costs to the Council recovered.
- Food standards and animal feed inspection work continues, and officers are in the process of familiarisation and adapting to transitional arrangements for the new food delivery model expected to be fully in place by 31st March 2025. Grants have been sought to support farm animal feed inspection and sampling work as part of the controls to protect the food chain.
- The sampling programme report for 2022/23 has now been fully evaluated and results from the appointed Public Analyst have all been confirmed and will be produced in the annual food and feed plan to be considered by JMB. Areas where concerns were identified included undeclared milk in drinks where the officer had indicated that had an allergy to milk when ordered and undeclared allergens in take-away meat products. Follow up action on all unsatisfactory composition and labelling was taken to bring the businesses into compliance through advice.
- Officers investigated eighteen fly tipping incidents in the Bracknell Forest area where evidence was found. Thirteen fixed penalty notices were issued. There continues to be a number of matters at investigation / prosecution stage.
- Consideration is now being given to increasing the fixed penalty levels for waste offences including illegal depositing (fly-tipping) and duty of care offences. A report will be considered by the Executive Member at Bracknell Forest Council in the near future.
- In addition to BaU, Trading Standards Officers were busy preparing and delivering a large-scale test purchase and seizure exercise for illegal vaping products. This included building the correct intelligence picture, followed by test purchasing, visits, seizure of suspect non-compliant product and consideration of the most appropriate courses of actions and follow-up for formal interviews and evidence gathering. Currently, the failure rate is around 22% of those premises visited across PPP (50), with varying degrees of volumes seized.
- The service has been awarded a government grant to look at compliance issues with the on-line sale of vaping products.
- A significant amount of work has been undertaken to support health harm reduction. These include school presentations and guidance on the unknown

risks of vaping by young and older children. We also work with Public Health colleagues and the NHS in supporting smoking prevalence in health settings. We continue to deliver responsible retailer training, auditing challenge 25 and working with the Football Association to reduce smoking by adults when spectating at children's football matches.

- The service continues to support the most vulnerable through its management of the [support with confidence scheme](#), supporting users of the community larder with advice on subjects such as housing conditions, debt management, rogue traders, healthy eating, illegal money lenders, fraud, and scam prevention work as well as victim support. The West Berkshire and Wokingham Support with Confidence Scheme recently celebrated its 200th member. [Major milestone for Support with Confidence Scheme - PPP \(publicprotectionpartnership.org.uk\)](#)

13. Commercial (Food Safety and Health and Safety)

- 13.1 One of the main focuses for the team this year will be to complete the food hygiene inspections of food businesses that are due for a risk-based audit. As has been previously documented, the inspection programme was seriously affected by Covid both due to premises not being open and because officers were engaged in Covid enforcement and prevention work. We are satisfied that we are on target to complete the programme this year which will see us audit almost 1,000 premises.
- 13.2 Officers are finding that the level of compliance in some premises has reduced. In discussions it seems that in part this can be attributed in some cases to the issues raised by business pressures relating Covid and the business costs. Subsequently we are having to spend longer with premises to achieve compliance and have instigated some temporary voluntary closures.
- 13.3 The team assisted the Food Standards Agency with their investigation into an infectious disease with possible links to meat imported into the UK. Traceability information was obtained from a food broker trading within West Berkshire.
- 13.4 Our work with food businesses also assists them to improve their food hygiene – and this in turn raises the Food Hygiene Rating that is published, for example, a small convenience store was re-rated from a 1 to a 5 under the FHRS after assistance from the team.
- 13.5 The Team continues to investigate accidents or concerns brought to our attention about possible breaches of the Health and Safety at Work etc Act 1974. In one example, fixed wiring electrical installation compliance was achieved at a retail business which was subject to a complaint. This involved significant remedial works to remove potentially dangerous conditions.
- 13.6 We work with premises of all sizes, an investigation into an accident at a large supermarket store resulted in revised procedures at National Level.

14. Licensing (Including Applications and Licensing Governance)

- 14.1 In Q1 the team undertook a consultation on variations to the taxi tariffs in West Berkshire. The revised tariffs came into effect on the 19 June 2023.

- 14.2 Training sessions for Members on the Licensing Act and Sub-Committees were held on the 31 May 2023 and the 15 June 2023 in West Berkshire. A training session was also held on the 28 June 2023 for Bracknell Forest Members.
- 14.3 The Service prepared comprehensive packs for all Members of the licensing committees out relevant legislation, policies, guidance notes and the scheme of delegation.
- 14.4 The service has also conducted two licensing consultations since the last meeting. The first was a consultation on whether the geographical element of the ‘knowledge test; should be retained in Bracknell Forest. This consultation ran from the 07 July to the 28 July). The second consultation related to West Berkshire Council’s Draft Statement of Licensing Policy. The ten-week consultation was launched on the 12 July and ended on the 20 September. The outcome of consultations can be found [here](#). They will be reported back to the October (BFC) and November (WBC) Licensing Committees.
- 14.5 Consultations will be conducted on those elements of discretionary fees for taxi and private hire vehicles and Private Hire Operators proposed by this Committee.
- 14.6 The following licensing panel/subcommittee meetings have taken place in Q1:

Type of Application	Applicant	Outcome
Bracknell Forest		
None		
West Berkshire		
New Premise Licence	Bite Express Ltd	Approved with additional conditions

15. Private Sector Housing

- 15.1 The annual caravan site inspections programme is underway with officers carrying out on-site inspections to ensure that the sites comply with their site licences and to ensure that there are no risks to safety from the operation of the sites.
- 15.2 The work around prior approval conversions continues with joint inspections with Royal Berkshire Fire and Rescue Service. This is revealing several issues that the service is working with owners and landlords to resolve.
- 15.3 We have carried out some inspections for both the Homes for Ukraine Scheme and proposed and existing asylum accommodation.
- 15.4 In the course of routine inspection activity, the team have identified:
- That increasing costs for landlords are having an impact on the landlords and their tenants, this created more complex issues and the resolution is prolonged.

- An increase in the number of cases that are progressing to enforcement, for example service of Improvement Notices, Prohibition Orders and investigation and we currently have two cases in the court system.

16. Environmental Quality

16.1 The team have continued to undertake work to protect the health and wellbeing of our residents through focused projects, planned inspections and responding to complaints particularly from noise from pubs this quarter. Some key activity undertaken during Q1 included:

- The Air Quality Annual Status Reports for West Berkshire, Bracknell Forest and Wokingham were all submitted to the Department of Environment, Food and Rural Affairs (DEFRA) on the 15 June 2023 before the deadline of the end of June. The West Berkshire and Bracknell Forest Council documents will be presented to the JPPC once feedback is received from DeFRA. The Wokingham Borough Council document and results will be passed on to the authority for processing under their governance arrangements.
- [Clean air day](#) was marked on the 15 June 2023 in conjunction with the education program for the anti-idling and behavioural change work. A series of social media posts were issued to mark the event and raise awareness.
- Further visits to schools to promote understanding around the importance of good air quality are ongoing.
- The service was involved in the Aldex Emergency Planning Exercise which tested a simulated incident involving the release of radioactive materials from the Burghfield site and which affected areas in West Berkshire, Reading and Wokingham. The aim of the exercise is to test West Berkshire Council's AWE Off-Site Emergency Response Plan.
- Staff have attended the mediation training delivered by RESOLVE during this quarter and were pleased to manage a successful outcome in a mediation case relating to residential accommodation above a health centre.
- The events monitoring programme for 2023/24 continues and has included a number of long-standing events as well as some new events being visited for the first time. These checks include noise levels and compliance with associated licence conditions.
- Work is now underway on petroleum licensing inspections work. One of the officers in the team has completed the necessary training and is now able to carry out inspections to support the trading standards team. The work will be conducted along with the pollution control work associated with filling stations which includes vapour recovery.
- The team has completed the update of the Private Water Supply sampling manual used by officers when conducting sampling.

- The team has attended a number of planning committees and briefings where noise issues and contaminated land are material considerations. They have also assisted with preparation and discharge of conditions.
- The team served a Control of Pollution Action 1974 s60 notice for noisy construction works.
- Officers undertook a waste clearance of a closed restaurant where they worked with colleagues from the Homelessness Team.

17. Case Management

17.1 The Case Management Unit continues to be busy working on cases and providing advice across PPP and also to partner organisations. Currently the team have oversight of some 56 criminal investigations (excluding road traffic matters). A number of these are at file stage or in the court system. New investigations are commencing all the time.

17.2 The NCA Accredited Financial Investigators have conducted 14 investigations relating to money laundering and confiscation under the Proceeds of Crime Act 2002.

17.3 Cases are continuing to be heard in both the Magistrates Court and the Crown Court however significant delays are still being encountered with trial listings in the Crown Court with one four day trial being listed for September 2024. Recent case examples include:

Bracknell Forest –

- Gardening & Landscaping business convicted after entering a guilty plea to one charge of fraudulent trading.
- Once customers had paid a deposit to get their gardens done, the defendant either did not complete the work or did not even start it. He defrauded a total of £32,429 across seven households.
- The defendant was sentenced to 12 months imprisonment suspended for 18 months. He was also ordered to undertake 200 hours of Unpaid Work, to complete 20 Rehabilitation Activity Requirement days and to pay compensation in the sum of £10,800.

Wokingham –

- London based Locksmiths convicted at Reading Magistrates' Court after being pleading guilty to three consumer protection offences in relation to overcharging and breach of professional diligence. The Company was ordered to pay a fine of £6,000, £1,881.40 in compensation and £6,206.80 prosecution costs.

West Berkshire –

- Builder sentenced to 4 years and 3 months immediate custody following guilty pleas being entered to three offences of fraudulent trading. This case related to several consumers who agreed to works only to find issues with pricing and timetabling of work. Consumers were left significantly out of pocket or with incomplete works costing more to put right the works. There were multiple victims

inside and outside West Berkshire. Compensation to the value of £58K was also paid by the defendant but this was significantly short of the victim losses.

Appendices

APPENDIX A – 2023/24 Performance Framework

APPENDIX B – Q1 Communications Update

APPENDIX C - Service Compliments

Background Papers:

None

Subject to Call-In:

Yes: No:

The report is to note only.

Wards affected: All Wards

Officer details:

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Job Title:	Public Protection Partnership Manager
Tel No:	01635 519840
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Service Requests Data

Table 1: Environmental Health and Licensing for PPP

Public Protection Partnership Bracknell Forest West Berkshire	2023/24			2022/23	2021/22	Comments
	Bracknell	West Berkshire	PPP	PPP	PPP	
	Q1	Q1	Q1	Q1	Q1 *	
Envirocrime	252	-	252	73	89	247 related to Abandoned Vehicles. New system records multiple SR's where multiple complainants exist.
Flytipping	19	-	19	13	33	
Food Hygiene Related	58	73	131	131	193	
Health and Safety (including accidents reported)	12	14	26	40	51	
Housing	98	55	153	124	117	
Licensing	38	53	91	157	206	
Other (e.g. other nuisances, cont. Land, private water supplies, burials, enclosed smoking)	15	30	45	77	-	
Planning	36	76	112	120	187	
Ukraine Accommodation Check	0	1	1	259	N/a	
Anti-Social Behaviour	73	159	232	204	144	
Dog Warden (stray dog collection only)	1	7	8	27	90	
Noise - Non-commercial	60	139	199	179	-	2021/22 data is for commercial and non-commercial combined. It is likely that some of the increase in numbers relates to the new IT system which logs each complaint about a premises separately whereas previously this would be logged as a single complaint with multiple complainants
Noise - Commercial	37	68	105	90	-	
All Bonfire/Smoke	22	27	49	45	142	
Grand Total	714	702	1416	1539	1882	

* The 2021/22 data includes figures for Wokingham too

Table 2: Trading Standards Service Requests (includes) commissioned services (Wokingham).

 Bracknell Forest West Berkshire Wokingham	2023/24				2022/23	2021/22	Comments
	Bracknell	West Berkshire	Wokingham	PPP	PPP	PPP	
	Q1	Q1	Q1	Q1	Q1	Q1	
Animal Health	1	5	2	8	20	23	
Door Step/Scam/No cold calling zones	11	24	12	47	28	57	
Food Standards	9	11	3	23	25	29	
Misleading Description	10	7	1	18	2	7	
Other (e.g. counterfeit goods, under age sales)	7	26	6	39	15	29	
Unsafe goods	15	9	14	38	10	11	
What are my rights? (Business)	3	0	2	5	29	35	
What are my rights? (Consumer)	96	80	106	282	361	292	
Trading Standards Notifications	152	271	152	575	1037	1271	
Weight Restrictions	6	76	11	93	0	68	Increased activity due to staff member being off sick in same period last year
Grand Total	310	509	309	1128	1527	1882	

Measures of Volume – No targets as they are cumulative measures of volume

Measure	2022/23 Outturn		Q1		Q2		Q3		Q4		2023/24 Outturn	
	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC
Number of Fols Processed*	145	172	43	43								
Time Taken to Process Fols to nearest hour	112	113	31	27								
Number of Service Complaints *	9	13	2	5								
Number of Councillor and MP Enquiries*	30	50	14	24								
Number of operations conducted based on intelligence relating to age restricted products*	1	3	3									
Number of PPP articles and press releases published on the PPP website	110		21									
Number of page views on PPP Website	88,872		22307									
Number of PPP Facebook posts	358		101									
Number of PPP Twitter Tweets	311		58									
Number of new PPP Twitter followers	29		0									
Number of Facebook New Followers	265		47									
Number of caravan site visits (programmed and reactive) *	39 (5 reactive)		1	1								
Number of food inspections carried out (includes those by alternative enforcement strategy) *	Data N/a		36	43								
Number of new food businesses registered*	Data N/a		23	58								
Number of HMO licenses issued*	Data N/a		2	0								
Number of housing visits carried out (excl Ukraine)*	Data N/a		38	18								
Percentage of Food Premises that have scored 0 (Urgent Improvement Necessary) in accordance with FHRS * (shown as denominator and numerator)	Data N/a		Data N/	Data N/a								
Percentage of Food Premises that have scored 1 (Major Improvements Necessary) in accordance with FHRS * (shown as denominator and numerator)	Data N/a		Data N/a	Data N/a								
Percentage of Food Premises that have scored 5 (Very Good) in accordance with FHRS * (shown as denominator and numerator)	Data N/a		Data N/a	Data N/a								

Measure	2022/23 Outturn		Q1		Q2		Q3		Q4		2023/24 Outturn	
	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC
Number of Licensing Applications under the Licensing Act 2003 that proceed to a hearing	0	0	0	1								
SAG Events Processed	New measure in Q4 = 151 at year end		64									

* will be reported by authority

Trading Standards Data

Product	22/23 Outturn	Q1			Q2			Q3			Q4			23/24 Outturn
	PPP	Wok	BFC	WBC	Wok	BFC	WBC	Wok	BFC	WBC	Wok	BFC	WBC	PPP
	Passes/ Visits	Pass/ Visit	Pass/ Visit	Pass/ Visits	Pass/ Visit	Pass/ Visits	Pass/ Visits	Pass/ Visits	Pass/ Visits	Pass/ Visits	Pass/ Visits	Pass/ Visits	Pass/ Visits	Pass/ Visits
Alcohol	12/13	11/11	3/4	0/0										
Tobacco	0	0	0	0										
Spray Paint	0	0	0	0										
Knives	8/8	0	0	0										
Fireworks	0	0	0	0										
Solvents	0	0	0	0										
E-Cigs	10/12	0	0	0										
	22/23 Outturn		Quarter 1			Quarter 2			Quarter 3		Quarter 4		23/24 Outturn	
Food Samples Passed/Failed	BFC 42 samples tested. 14 unsatisfactory for composition and/or labelling.		10 (alcohol) samples submitted - awaiting results											

Key Performance Indicators Public

Type	Measure	2022/23 Outturn		Q1		Q2		Q3		Q4		2023/24 Outturn	
		BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC
IAA	% of service users satisfied with the Public Protection Partnership	80% good or excellent		13/15 = 87%									
Local	% of Trading Standards requests for advice from business responded to within 3 working days	Data unavailable due to challenges in migrating CAB connector to IC – Duty officer in place to ensure timely response.		Data unavailable due to challenges in migrating CAB connector to IC – Duty officer in place to ensure timely response									
IAA	Management of income to within 5% of budget	£98k shortfall		Predicted underspend of £200k**									
Statutory	% of valid TEN's and Late TENS processed for consultation within 3 working days	Data N/a		Data N/a	Data N/a								
Local	% of Premise licensing applications (New and Variations) processed within 28 days or 56 days if they proceed to a hearing	Data N/a		Data N/a	Data N/a								
Local	% of valid Taxi licensing applications and renewals processed within five days	Data N/a		Data N/a	Data N/a								
Local	% of valid general licensing applications and renewals processed within five days	Data N/a		Data N/a	Data N/a								
Statutory	% of local authority pollution prevention and	14/14 completed		0/5 completed	2/21 completed								

Type	Measure	2022/23 Outturn		Q1		Q2		Q3		Q4		2023/24 Outturn	
		BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC	BFC	WBC
	control (LAPPC) inspections, that are due, carried out												
Local	% of inspected food businesses that score at least 3 on the food hygiene rating scale during reporting period	Data N/a		Data N/a	Data N/a								

** See financial implications in the covering report

Annual Key Performance Indicators Public

	Measure	2022/23 Outturn	2023/24 Outturn	
IAA	Management of budget to within 1% of baseline	£148k underspend	Will be reported in Q4	
Statutory	Submit Annual Air Quality Reports to DEFRA by 30 June	All 3 submitted to DeFRA on the 27 June 2022	All 3 submitted to DeFRA on the 15 June 2023	Green
Statutory	Submit to JMB the Annual Food Safety, Food Standards and Feed Service Plan in accordance with the Food Standard Agency Code of Practice	Annual Food Standards and Feed Service Plan have been submitted to JMB by August 2022	Will be reported in Q2	
Local	Four During Performance Inspections carried out on high profile events per annum	6	Q1 = Noise monitoring of 3 of The Mount events at Wasing carried out	
Local	% of caravan sites due an inspection inspected within the reporting period	BF 100% WB 100 %	Will be reported in Q4	
Local	% of food hygiene inspections completed, that are due, as per FSA recovery plan	FSA RECOVERY PLAN 22 23 All A, B, C and non Broadly Compliant D to be done All unrated to be prioritised and high Priority inspected.	Will be reported in Q4	

	Measure	2022/23 Outturn	2023/24 Outturn	
		<p>A premises – 100% (3 premises)</p> <p>B premises – 100% (24 Premises)</p> <p>C premises – 100% (155 premises)</p> <p>In addition, over and above the FSA targets D 131 visits done</p> <p>Unrated – all prioritised and 226 visits done (8 high risk to be carried out)</p>		
Local	% of food standards inspections completed, that are due, as per FSA recovery plan	<p>BF</p> <p>High risk - 100%</p> <p>Med risk – 75%</p> <p>Low – Response only/AES</p> <p>*Unrated – 78 premises assessed, prioritised & Inspected as necessary (2 new high risk programmed for inspection carried over)</p> <p>WB</p> <p>High Risk – 100%</p> <p>Med Risk – 74%</p> <p>Low – Response only/AES</p> <p>*Unrated – 348 premises assessed, prioritised & inspected as necessary (3 new high risk programmed for inspection carried over)</p>	Will be reported in Q4	
Local	% of food premises rated as 0 or 1 on the FHRS at the start of the	WB 7 premises in scope 3 of these ceased trading	Will be reported in Q4	

	Measure	2022/23 Outturn	2023/24 Outturn	
	year that are broadly compliant (3 score or above) by their next full inspection visit (subject to pending enforcement action) for premises with inspections due in reporting period	<p>4 of these improved One remained a 1 score Therefore 50% reached score 3 or more BF 6 premises in scope 1 of these ceased trading 4 improved to BC One remained a 1</p> <p>Therefore 80% reached score 3 or more</p>		

Local Indicators for Bracknell Forest Council

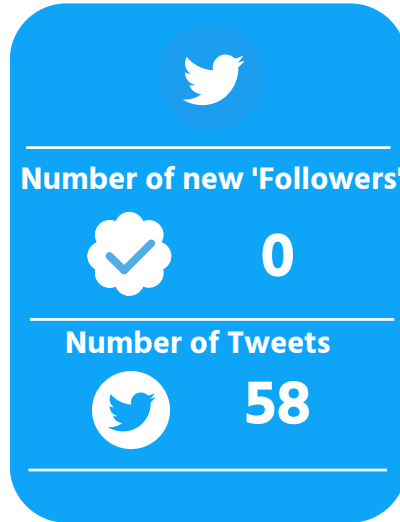
Measure of Volume	2022/23 Outturn	Q1	Q2	Q3	Q4	2023/24 Outturn
Fly Tipping / Waste Duty of Care Incidents						
Number of fly tipping / waste 'duty of care' incidents referred to PPP	101	18				
Number investigated	101	18				
Number of warnings issued	14	3				
Number of formal cautions issued	2	0				
Number of Fixed Penalty Notices issued	16	13				
Number of Prosecutions	6	0*				
Waste Carriers						
Number of vehicles checked for waste carriers' licence	112	0				
Number of compliant waste carriers	105	0				
Number of non-compliant waste carriers	7	0				
Abandoned Vehicles						
Number of abandoned vehicles reported and actioned	491	247				
Number of abandoned vehicles traced	30	28				
Number of abandoned vehicles removed from highway	4	3				

* files are with legal for processing

Local Indicators for West Berkshire Council

Measure of Volume	2022/23 Outturn	Q1	Q2	Q3	Q4	2023/24 Outturn	Comments
Weight Restrictions							
Number of observations made	197	67					
Number of breaches of restrictions observed	169	71					
Number of warnings issued	11	Reported Q4					
Number of Prosecutions concluded	25	Reported Q4					

PPP Comms Summary Q1 - 2023/24



Top Facebook and Twitter Post of the quarter

Facebook

We have been advised this afternoon that the out of hours telephone numbers for our Animal Warden Servi...
Published by Caroline Grey · 6 April at 15:33 · 🌐


Post impressions <small>i</small>	Post reach <small>i</small>	Post engagement <small>i</small>
2,925	2,803	44

Twitter


<p>Public Protection Partnership @PublicPP_UK</p> <p>Did you know that 90% of food businesses achieve a food hygiene rating of 4 or 5?</p> <p>@foodgov business hub has everything you need to prepare for your next inspection.</p> <p>Visit http://food.gov.uk/here-to-help</p> <p>#FSAHereToHelp https://twitter.com/foodgov/status/1661333793956065280 ...</p>	<p>Impressions 183</p> <p>Total engagements 1</p> <p>Likes 1</p>
--	--

	New Followers	No. Posts
April	-1	31
May	6	32
June	42	38


Top 3 Performing Facebook Posts in Q1

 We have been advised this afternoon that the out of hours telephone numbers for our Animal Warden Servi...


Published by Caroline Grey · 6 April at 15:33 · 

Post impressions 

2,925

Post reach 

2,803


Post engagement 

44




Congratulations to all the team at Robyn's Nest Cafes at Moss End on their 5 food hygiene rating, following a...


Published by Lisa Barnes · 23h · 

Post impressions 

2,812

Post reach 

2,796

Post engagement 

321



Following a programmed food hygiene inspection last week, a 5 rating food hygiene rating was awarded to...

Published by Lisa Barnes · 25 April at 16:07 · 

Post impressions 

1,764

Post reach 

1,764

Post engagement 

200



New Followers

No. Tweets

Month	New Followers	No. Tweets
April	1	26
May	1	21
June	-2	11

Top Performing Twitter Posts in Q1

Public Protection Partnership @PublicPP_UK

Did you know that 90% of food businesses achieve a food hygiene rating of 4 or 5?

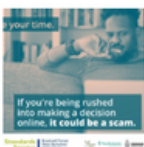
@foodgov business hub has everything you need to prepare for your next inspection.

Visit <http://food.gov.uk/here-to-help>

#FSAHereToHelp

<https://twitter.com/foodgov/status/1661333793956065280> ...

Impressions	183
Total engagements	1
Likes	1



Public Protection Partnership

@PublicPP_UK

Energy Efficiency - Be wary of callers posing as energy companies and engaging with you to obtain your personal information and bank details. Be cautious of talk about grants, fake energy refunds and promises of cheap energy and other energy efficiency claims.

#BeScamAware pic.twitter.com/vi33b1UanH

Impressions	122
Total engagements	8
Retweets	3
Detail expands	3
Likes	2



Public Protection Partnership

@PublicPP_UK

Earlier this month our Scams Victim Support Officer spent the day at @Barclays bank in #Wokingham at their fraud event day.

If you work with a group of people who might benefit from scam awareness training then please get in touch - 01635 519930/ email tsadvice@westberks.gov.uk pic.twitter.com/htr1f6RtJ

Impressions	115
Total engagements	4
Likes	2
Retweets	1
Media engagements	1

Month	Visitors	Articles Published
April	6,657	7
May	7,822	4
June	7,828	4

Social Platforms Traffic

Number of views to website from social media posts.

	Facebook	Twitter
April	154	2
May	101	12
June	227	2

Other Media Coverage

Number of press enquires to PPP in Q1 - 4

Number of press releases sent out from PPP in Q1 - 6

Number of radio interviews with PPP in Q1 - 1

Number of TV programmes with PPP coverage in Q1 - 0

Number of article's published online mentioning PPP, excluding PPP website in Q1 - 9

Number of articles published on PPP website in Q1 - 15

Quarter 1 Selection of Service Compliments

From a Councillor in response to a request for an update on an ongoing matter:

“Many thanks for the Update, greatly appreciated..”

From a customer who was assisted by an officer with changing the DPS on a licence:

“Please see proof of payment of £23.00 below, I wish all Council's operated so easily and fast, Thank You.”

From a licence holder who was assisted by the Applications Team in the granting their licence:

“Thank you so much for all your help and patience with this. I really appreciate your help and you've been fantastic.

Will be sure to reach out in the future if we ever need your assistance, and please come in to see us in the shop/restaurant when next passing”!

From a resident who was having difficulty returning a faulty vehicle to a second hand car dealership:

“Hi Honor,

Thank you for your help and advice. I don't anticipate any further issues around this return but your help has been invaluable.”

Email received after one of our officers attended a group to talk to them about scams:

“Dear Malcolm

On behalf of the Committee, I would like to thank you for coming to talk to us last Monday. I think it's safe to say that we are all aware of scams and the vulnerabilities of some of our generation but as you probably judged from our reactions we had no idea of the severity of the situation! The statistics are quite mind-blowing and the lengths to which these awful people are prepared to go to, equally disturbing.

Your talk and slideshow was not only interesting and informative but hugely eye-opening and I think made us extremely aware how vigilant we must be, not only for ourselves but for others.

Thank you for your time and good humour whilst dealing with a very frightening and worrying subject. It is quite clear that you and your department have a monumental task on your hands and I hope that the 'Powers That Be' recognise this and give you the support and resources you require to continue to help those who need it."

From one of the event organisers who regularly attended Safety Advisory Group (SAG) meetings who was moving onto a new role:

"Thank you so, so much for all the support SAG have given me (particularly coming out of Covid), it's been a really great group to work with."

Response from a resident after one of our Environment Control Officers had responded to their service request relating to a noise nuisance and concerns for animal welfare.

"I am so impressed with how you have dealt with this. Usually when you log things like this you're not even sure if it will get read, so you have restored some faith. Tell your manager I think you've done a great job here! "

An email received after one of our Environment Health Officers assisted residents with getting a blackout piece turned around, to divert the beam away from their homes and towards the business park the light was erected to light up for security purposes.

"I have good news.

Thank you so much for all your help with this matter. We got there in the end."

One of our Trading Standards Officers helped a resident get a payment made by her grandmother refunded after establishing that the businesses had not followed due process

"I've asked my nan to phone her bank and they've confirmed that the money has gone into her account, so I think we have finally got there! Thank you once again for all your hard work on this, we really do appreciate it and wouldn't have had this resolution without you."

A thank you to one of our Environment Health Quality Officers who assisted a resident with a noise complaint:

"Thank you very much for looking into this for me. I know they have given that explanation to everyone who complained directly to them but we can't actually find anyone who was informed about it.

Hopefully this was a one off and they realised how much the people in the village were disrupted by it.

Once again many thanks for your help,"

PPPs Approach to Age Restricted Products

Committee considering report:	Joint Public Protection Committee
Date of Committee:	2 October 2023
Chair of Committee:	Councillor Lee Dillon
Date JMB agreed report:	11 September 2023
Report Author:	Sean Murphy
Forward Plan Ref:	JPPC4366

1. Purpose of the Report

- 1.1 To set out an updated Enforcement Approach to Age Restricted Products 2023-2025 policy and invite the Committee to consider, amend and/or adopt the Policy.

2. Recommendations

The Committee:

- 2.1 **ADOPTS** the revised Enforcement Approach to Age Restricted Products 2023-2025 subject to any amendments agreed at the meeting.

3. Implications and Impact Assessment:

Implication	Commentary
Financial:	<p>None – this work will be undertaken within existing budgets.</p> <p>Occasionally grant funding becomes available for targeted campaigns. Over the years these have included sales of knives, vapes and alcohol.</p> <p>We have also accessed grants from the Public Health teams to support the work that we do in schools and the wider community to reduce youth harm from alcohol and tobacco. We are currently look at the possibility of accessing public health funding around the issue of under-age sales of vaping products.</p>
Human Resource:	<p>None – this work will be undertaken by existing resources.</p> <p>This work is primarily led by the trading standards service with respect to under-age sales and working alongside the licensing team with respect to alcohol sales.</p>
Legal:	<p>It is a legal requirement that Councils with enforcement responsibility for enforcing the age restriction requirements for tobacco and aerosol spray paints. This report and associated policy fulfils' these legal obligations.</p>

	There is a wide of legislation setting out the restrictions and the various duties on the Councils with respect to enforcement. The primary enforceable restrictions are set out in 4.2 of this report.			
Risk Management:	In adopting this revised and up to date policy, the Council will have set out a clear approach to the enforcement of age restricted products.			
Property:	None			
Policy:	The Joint Public Protection Committee is charged with setting the policy direction for the delivery of a range of functions associated with the protection of the public. This report provides an updated version of the policy in order to ensure the Council's approach remains clear and transparent in this area of work.			
	Positive	Neutral	Negative	Commentary
Equalities Impact:		X		
A Are there any aspects of the proposed decision, including how it is delivered or accessed, that could impact on inequality?		x		
B Will the proposed decision have an impact upon the lives of people with protected characteristics, including employees and service users?		x		
Environmental Impact:	X			Disposable vapes (littering) can be addressed as part of the awareness raising programmes for retailers. Certain obligations are on retailers/manufacturers to ensure proper facilities for disposal are provided, and this is included in the responsible retailer messaging.
Health Impact:	X			Reducing the ability to sell age restricted products will reduce the harms to children (and others) created by them.

ICT or Digital Services Impact:		x		None
PPP Priorities :				The report will impact on the following PPP Priorities (delete those that are not appropriate) <ol style="list-style-type: none"> 1. Alcohol and Tobacco Harm Reduction 2. Licensing 3. Unsafe Consumer Goods
Data Impact:				None
Consultation and Engagement:	PPP Officers, Joint Management Board, and the Case Management Unit have been consulted.			
Other Options Considered:	None			

4. Executive Summary

Background

- 4.1 Many products that are sold at retail level either through shops or online can present a risk to adults and young people if consumed, abused, or misused. For this reason, a range of controls have been developed over the years that control the sale and in some cases the composition and marketing of those products. The most stringent controls on sale are restrictions on sales to young people or in the case of alcohol through a licensing regime. These restrictions are all aimed at reducing harm or the risk of harm.
- 4.2 The Public Protection Service recognised many years ago that any enforcement was only one part of the picture when it comes to reducing the risk of harm to young people and the wider community. An effective strategy had to involve working with key partners both internally (Community Safety, Public Health) and externally such as the Thames Valley Police and schools. It had to include not just enforcement but also working with retailers and above all with young people, parents and carers and the wider public and include comprehensive engagement and education programmes and effective co-ordination.
- 4.3 This work has so many links to key council priority areas around health and wellbeing, reductions in health inequalities, building safer and stronger communities, reducing anti-social behaviour and the promotion of safer streets and the reduction in violence to woman and girls. Finally it contributes to the economic policies by working with key partners to promote town centres and the night time economy as safe and welcoming.
- 4.4 Our work in these areas has shown significant success with the levels of test purchase failures falling over many years as a result of improved compliance. There are always new areas of policy development and emerging issues as we have seen in recent years with concerns around knives, corrosives, cosmetic treatments and more recently vaping products and the sale of and abuse of Nitrous Oxide with tighter restrictions on both being considered by national policy makers.
- 4.5 As has been alluded to above, the key to reducing harm is an effective approach which includes effective partnership working and linking these important measures to key

strategies around health and wellbeing, safer communities, violence harm reduction and safer streets.

4.6 Finally there is the link to the work of the Licensing Committees as the guardians of licensing policy in each Council area. It is critical that this work feeds in the development of licensing policy and the delivery of the licensing objectives.

The Policy

4.7 It was previously agreed that a policy position was set up on how the Public Protection Partnership (PPP) should conduct itself when dealing with its enforcement approach to age restricted products.

4.8 Legislation that exists recognises that not all products are appropriate for sale to persons under a certain age. These include the following, and the age limit is 18 years of age (unless otherwise stated).

- Alcohol
- Cigarettes, tobacco, shisha and other smoking based products
- E Cigarettes and Vaping Products
- Fireworks - sparklers, party poppers (16), caps (16), cracker snaps (16)
- Aerosol spray paints (16)
- Intoxicating Substances e.g. solvents and glues
- Corrosives, Petrol (16)
- DVDs, Blu Rays and computer games (12,15, or 18 depending on classification)
- Dangerous Weapons - air weapons, crossbows, knives
- Gambling - Lottery tickets and scratch cards (16), prize machines
- Bookmakers
- Sunbeds and certain beauty and other treatment procedures (Botox, Lip-fillers, tattooing)

4.9 It is appropriate to review the policy position from time to time to ensure it remains relevant.

4.10 The legal framework is in place to require that retailers do not sell certain products to those not of legal age to purchase such products.

4.11 This policy sets out a clear and transparent standard around how the Councils will, through partnerships, advice and enforcement measures, ensure protections for children who attempt to purchase products that are aged restricted as well as providing protection for the wider community from associated anti-social behaviour.

4.12 The key changes made to the existing policy are set out below:

- Stronger links to wider Council / partnership strategies;
- New focus on on-line sales;
- Stronger focus on communication and engagement;
- Minor changes to reflect a broader remit by removing/altering references to tobacco and alcohol sales only;
- To better reflect PPP's role in its tobacco control alliance work;
- To identify the risk to young people of smuggled, counterfeit and illegal products.

4.12 Communication and community engagement is a big part of the work we do to raise awareness and achieve compliance with prevailing legislation and reduce harm. Examples can be found at Appendix B to this report.

5. Concluding Observations

- 5.1 Effective enforcement can be defined as enforcement in context. All of the work of the Public Protection Service can be viewed on the context of wider policy and societal agendas. None more so than this.
- 5.2 This short report has sought to set out some of that context and the significance of this work. The updated policy is presented to the Committee for consideration as a succinct summary of the proposed approach.

6. Appendices

- 6.1 Appendix A – Reducing the Harms Caused by the Illegal Sale of Age Restricted Products Policy Statement
- 6.2 Appendix B – Samples of communication and community engagement relating to age restricted products.

7. Background Papers:

- 7.1 (Current) Enforcement Approach to Age Restricted Products policy (undated).
[enforcement-approach-to-sale-of-age-restricted-products.pdf](#)
([publicprotectionpartnership.org.uk](#))

Officer details:

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Reducing the Harms Caused by the Illegal Sale of Age Restricted Products Policy Statement



A shared service provided by
Bracknell Forest Council and
West Berkshire Council



PUBLIC PROTECTION PARTNERSHIP
TACKLING THE HARM FOR THE ILLEGAL SALE
OF AGE RESTRICTED PRODUCTS

Policy Context

1. Many everyday products sold at retail level can present risks if misused, abused or in some cases such as tobacco present inherent health risk of themselves.
2. The illegal sale of age restricted products has a detrimental impact on the health and wellbeing of individuals and on the wider community.
3. The impact on the physical and mental health, wellbeing and safety of young people can be significantly affected by the illegal sale of age restricted products.
4. The effective control of young people having access to harmful and potentially harmful age restricted products is critical to delivering wider Council objectives and strategies around health and wellbeing (including health inequalities), safer communities and safer streets.
5. In delivering this important policy area, the PPS will work closely with key partners including schools, public health teams, Thames Valley Police and others identified in the relevant control strategy.
6. We will continue to work with programs and projects being delivered through partner organisations involved in the delivery of trading standards including the National Trading Standards Board and Trading Standards South East.
7. It is recognised that online trading is now a significant part of the trading environment for 'age restricted products' therefore the approach taken to enforcement will include the monitoring of on-line sales for compliance.
8. Illegal activity such as smuggling, counterfeiting and the sale of non-compliant and illegal product can undermine the controls to protect young people from harm, these include the fiscal controls such as duty. For this reason, our enforcement programme will include tackling illegal products.
9. It is also recognised that this area of service delivery has strong links to the delivery of the licensing objectives around public safety. the prevention of public nuisance and the protection of children from harm.

Working with Retailers

10. The Public Protection Service (PPS) acknowledges the role that responsible retailing plays in ensuring the sale of such products is conducted in a manner which limits that impact and the harmful effects on the safety and health of individuals. To this end the PPS will work with retailers to raise awareness of risk and to improve compliance. This work will be particularly focused around new controls or where emerging concerns at local or national level have been identified.
11. The PPS will continue to encourage and support responsible retailing by offering advice and support on how to best achieve compliance with the legislation relating to the sale of age restricted products.

Working with the Community

12. The PPS will continue to raise awareness in the wider community of the issues relating to the misuse of age restricted products by young people and to seek the support of the community in driving out illegal sales by encouraging reporting and building local intelligence pictures.

13. The PPS recognises the role that the wider community plays in supporting young people to make informed choices. Through targeted product related schemes and initiatives, the service will continue to engage with young people and the education community in order to close the circle between education and regulation putting real lives and impacts at the heart of the implementation of regulation.
14. The PPS will continue to support wider council strategic objectives that reduce the physical and mental health impacts of harmful age restricted products as well as the wider societal impacts relating to the safety of communities and individuals.

Links to the Licensing Functions

15. The PPS will ensure that work programmes are clearly linked to the delivery of the 'licensing objectives' including playing our full part as 'Responsible authorities' under the Licensing Act 2003. This will include policy input, reviewing applications, enforcement and where appropriate reviews and legal actions. These will be reported to each Licensing Committee annually.
16. The PPS will use powers such as the instigation of licence reviews or temporary closure orders to secure ongoing compliance with the law and to provide a deterrent effect by highlighting the commercial risks of non-compliance.

Enforcement

17. The PPS in conducting our enforcement work, will continue to develop and have regard to intelligence, whether from partner agencies or the wider community.
18. While acknowledging the national guidance on the conduct of test purchase operations, it is the view of the PPS that wider geographical operations support legitimate businesses and play a significant role in gathering intelligence and assessing overall compliance levels.
19. The PPS is of the view that test purchasing used as part of a balanced approach helps maintain a high level of vigilance and provide visible reassurance of our efforts to secure a level playing field.
20. Test purchasing programmes will in their development and delivery include product appropriate levels of online test purchasing.
21. We believe that our operations should recreate a real-life scenario and young people involved in test purchasing operations will be allowed to conduct the test purchase in a manner which is consistent with real-life.
22. In carrying out test purchasing, steps to provide safeguards for both the young person and the trader are taken including having regard to national guidelines in respect of ensuring the safety of young people. Where appropriate we will take legal or other action against traders and individuals in accordance with the PPP's adopted Enforcement Policy.
23. There will be a comprehensive enforcement programme relating smuggled, counterfeit and illegal goods that undermine controls to protect young people from harm.

Review

24. The Joint Case Management Unit will keep under review new legal requirements and adjust operating policies and procedures accordingly.

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PPPs Comms re Age Restricted Products

Examples of UAS PPP related press coverage.

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Thames Valley Police find shop selling alcohol to under-age children

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Great Hollands: Shopkeeper sold Pimms to girl, 15

Kennet Radio

Thattham retailer fined for selling vaping product to 15 year old.

On 22 November 2019, a Thattham based company, Vaper Wise Ltd trading from Vapourwise, 1 High Street, Thattham, RG19 3JD entered a guilty plea by post at...



Berkshire Live

Shopkeeper blames armed robbery and debt for allowing underage booze sales

A Caversham shop caught selling alcohol to underage drinkers is set to lose its licence. But the community believe the owner of Best One...



PPPs comms re Age Restricted Products

Examples of UAS social media posts.

Public Protection Partnership
Published by Lisa Barnes · 1 d ·

Did you know that our Trading Standards Officers regularly visit retailers to check their underage sales procedures. Such items include, but are not limited to:

- alcohol
- tobacco
- nicotine inhaling products
- explosives such as fireworks, sparklers, party poppers and caps
- offensive weapons (knives)
- lottery and
- videos, DVDs, video games.

Trading Standards suggest to businesses that they avoid making underage sales by:

- having an age verification policy of challenge 25 in place
- training all staff on this policy and acceptable forms of ID
- point of sale and shelf line notices and
- keeping a refusals log that is checked monthly by a senior staff member.

For more information to support businesses head over to our website via link below:
https://publicprotectionpartnership.org.uk/_/age-/

Residents, if you're aware or suspect a retailer of supplying age restricted items to young people by contacting our Trading Standards via tsadvic@westberks.gov.uk

Public Protection Partnership
Published by Moira Fraser · 31 July ·

Last week our Officers conducted underage sales and compliance testing for vape sales in West Berkshire. We're delighted to report that all ten of the premises visited were compliant.

If you suspect premises are selling age restricted or non-compliant products contact our Trading Standards team on 01635 519930 or email tsadvic@westberks.gov.uk

Challenge 25
If you are lucky enough to look under 21 you will be asked to prove that you are over 18 when you buy alcohol or tobacco.

Public Protection Partnership
Published by Lisa Barnes · 21 July ·

Earlier this month our Trading Standards officers conducted under age sales testing for disposable vapes in Bracknell Forest. We're delighted to report that in all 9 of the shops we tested, with our under age volunteer, no sales were made and ID was requested in each store. These stores all complied with their legal requirement of not selling vapes to anyone under the age of 18.

If you're a retailer more resources are available via link below regards to the legal requirements around vapes and vaping product sales, including posters you can display in your store.

We would urge members of the public to report any retailers that they suspect or know are selling age restricted products illegally. You can contact our Trading Standards team on 01635 519930 or email tsadvic@westberks.gov.uk
https://publicprotectionpartnership.org.uk/_/bracknell-/

Public Protection Partnership
Published by Lisa Barnes · 20 February ·

Are you a retailer who sells vapes? Do you and all your staff understand the law with regards to underage sales and vaping products? Take a look at the link below for more information and free resources for you to use:
https://publicprotectionpartnership.org.uk/_/vaping-/

WE ONLY SELL VAPES TO 18's & OVER.
It is illegal to sell E-cigarettes, including vaping liquids containing nicotine, to any person below the age of 18.

Public Protection Partnership
Published by Lisa Barnes · 18 May 2022 ·

Bracknell shopkeeper and seller convicted for selling alcohol to 15 year old.

Mr Deep Singh, of Beechwood Avenue, Hayes, was convicted at Reading Magistrates' Court on 13 May 2022 together with his employee Mr Harpal Singh of Regina Road, Southall, after both pleaded guilty to the offence.

Mr Deep Singh, as shop proprietor, was ordered to pay £616 in fines, victim's surcharges and prosecution costs. Mr Harpal Singh, as the seller, was fined £73 though also had to pay towards victim's surcharge and costs.

Both were prosecuted following an operation by officers from the Public Protection Partnership (PPP) supported by the Joint Case Management Unit.

On 23rd September 2021, at 18:45 hours, volunteers aged under 18 with PPP officers entered Great Hollands Off Licence at 10 Great Hollands Square, Bracknell, RG12 8LX. One of the volunteers picked up a can of Pimm's with lemonade, went to counter and was able to buy it. No attempt was made to ask for any proof of age or any form of ID by the seller.

In mitigation, Mr Singh said since the incident he had brought a new till which would prompt a seller with certain products to ask for ID for anyone appearing to be under 25. He had also retrained his staff and put things in place so it won't happen again.

Commenting on the case Cllr John Harrison, Chairman of the Joint Public Protection Committee said, "This prosecution shows that licensed premises operators need to be very careful that they aren't selling alcohol to underage customers. The penalties can be much larger than any profit to be made from risking the sale and shopkeepers can ultimately end up losing their licence to sell alcohol if they do not prevent sales to minors."

PPP routinely checks supermarkets, shops and off licenses for compliance with legislation. In this case, they were checking for sale of alcohol to a person under the age of 18, but they will also check for things like blades, fireworks, and other age restricted products as well as food inspections, health and safety, etc.
https://publicprotectionpartnership.org.uk/_/bracknell-/

Examples of posters we've used that highlight UAS and support retailers.

WE ONLY SELL VAPES TO 18's & OVER.
It is illegal to sell E-cigarettes, including vaping liquids containing nicotine, to any person below the age of 18.

Trading Standards Service | Bracknell Forest West Berkshire Wokingham

For more information and advice on vaping visit link or use QR code:
publicprotectionpartnership.org.uk/about-us/campaigns/vaping-education-campaign

publicprotectionpartnership.org.uk
01635 503242

TOBACCO RETAILERS

Trading Standards Service | Bracknell Forest West Berkshire Wokingham

FREE Webinar and Q&A

A workshop designed to support retailers to sell tobacco responsibly and legally.

- Legal requirements of retailers regarding age restricted sales
- Types of ID and what to do if an ID is fake
- Face coverings and checking ID
- Proxy sales

Monday | July 26 | 7 - 8pm
FREE to attend - Delivered via ZOOM
To register, email: Caroline.Stevenson@westberks.gov.uk

Guidance Notes - The Botulinum Toxin and Cosmetic Fillers (children) Act 2021

Guidance notes for businesses:

From 3rd October 2021 the Botulinum Toxin and Cosmetic Fillers (Children) Act 2021 has been introduced to protect persons and business owners from administering botulinum toxins (generally referred to as Botox) and cosmetic fillers to children under the age of 18. The new law provides the highest possible level of protection for young people by ensuring such treatments will now only be available following an assessment by a doctor, and performed by a registered healthcare professional.

- Any aesthetic facial procedures MUST be carried out with prior notice to the intervention by a registered practitioner who has been notified the appropriate training qualifications in order to do so. Only to persons over 18.
- It is a criminal offence to administer botulinum toxins, or a filler, by way of injection, for a cosmetic purpose to a person under 18 in England. It is an offence to make arrangements for, or book an appointment to provide, these treatments to any person under 18 in England (even with parental consent).

Tackling Fraud and Unfair Trading

Committee considering report:	Joint Public Protection Committee
Date of Committee:	2 October 2023
Chair of Committee:	Councillor Lee Dillon
Date JMB agreed report:	11 September 2023
Report Author:	Sean Murphy
Forward Plan Ref:	JPPC4366

1. Purpose of the Report

- 1.1 To provide the Committee with an update on the work of the Public Protection Service in tackling fraud and financial abuse.

2. Recommendations

The Committee:

- 2.2 **NOTES** the actions taken by the Service to mitigate the impacts of fraud and financial abuse on businesses and residents.
- 2.3 **RESOLVES** that the Committee receive an annual report on service delivery appertaining to this important area of work.

3. Implications and Impact Assessment:

Implication	Commentary
Financial:	<p>The funding for this work primarily comes from the service revenue allocations from Bracknell Forest, West Berkshire and Wokingham.</p> <p>In addition, Level 2 and Level 3 investigations are generally supported via grant funding from BEIS and managed by the National Trading Standards Board and Trading Standards South-East. In 2023/24 this grant funding will exceed £300K.</p> <p>Work to tackle scams also receives grant funding from various community safety grants and has some input from the proceeds of crime asset recovery reserve.</p> <p>With revenue funding under pressure this area of work will need to be considered and prioritised in the context of overall demand.</p>
Human Resource:	None – this work is generally delivered through specialist resource employed by the service on a permanent basis.

	From time-to-time additional agency resource is brought through deployed grant funding. We are also supported by regional and national investigative resource.			
Legal:	<p>The Councils have a significant range of statutory responsibilities that are discharged through the shared service. These relate to unfair trading, consumer rights and counterfeiting amongst other matters. These matters are delegated to the Committee and operationally through the Inter-Authority Agreements of 2017 and 2022.</p> <p>The Councils can also institute legal proceedings if they are in the interests of residents in their area or in the case of many trading standards matters for offences committed anywhere in England or Wales.</p> <p>There is a large volume of legislation and associated statutory codes that govern investigations including the Criminal Procedures and Investigations Act 1996, Data Protection Act 1998, Police and Criminal Evidence Act 1984, the Regulation of Investigatory Powers Act 2002 and Investigatory Powers Act 2016.</p> <p>The Council's must have regards to the Human Rights Act 1988 and, in particular, Articles 6 and 8 of the Charter in Human Rights.</p>			
Risk Management:	Failure to comply with the framework set out in the Legal section above could lead to defendants being acquitted and the Councils facing judicial challenge together with the risk of damages and other sanctions.			
Property:	None			
Policy:	<p>The Joint Public Protection Committee is charged with oversight of the delivery of the Public Protection Service. This report sets out our programme of delivery in a significant area of our work.</p> <p>The Committee is invited to consider, comment and advise on strategic direction.</p>			
	Positive	Neutral	Negative	Commentary
Equalities Impact:		X		
A Are there any aspects of the proposed decision,		x		

including how it is delivered or accessed, that could impact on inequality?				
B Will the proposed decision have an impact upon the lives of people with protected characteristics, including employees and service users?		x		
Environmental Impact:	X			
Health Impact:	X			
ICT or Digital Services Impact:		x		
PPP Priorities :				
Data Impact:				None
Consultation and Engagement:	PPP Officers, Joint Management Board and the Case Management Unit have been consulted.			
Other Options Considered:	None			

4. Executive Summary

Background

- 4.1 Fraud is one of the prominent crimes of the current era. Many organisations are involved in tackling both the perpetrators and impacts. The Public Protection Partnership plays a significant role in tackling fraud carried out in the course of business (or assumed business) activities or in the area of fraud commonly referred to as 'scams'. There are significant links and often a fine line between fraud and the statutory duty to enforce 'unfair trading legislation' as well as links to other acquisitive crime such as money laundering and counterfeiting.
- 4.2 As fraudulent activity is complex and sophisticated it is often difficult for victims to understand how to protect themselves and around a third of victims fall prey to another scam within 12 months (National Trading Standards Scams Team, 2016). The consequence of fraud is not only financial., The emotional and psychological impact on victims results in increased isolation, diminished confidence and reduction in health and well-being. It also has a significant impact on the economy.
- 4.3 The National Trading Standards Scams Team produced a report titled 'Coercion and control in financial abuse; learning from domestic abuse' in October 2022. The report

is attached at **Appendix A** to this report. It sets out how we can draw on experience and good practice associated with dealing with domestic abuse to start to reform the perceptions and the language used in relation to financial abuse. It also considers strategies to reduce the risk and impact of financial abuse in our communities.

- 4.4 There are consequential effects on victims of fraud and scams;
- They may be or may feel heavily reliant on the trader/perpetrator and don't want to lose their support and services.
 - They may have been groomed into thinking they are making good, reasonable choices and making reasoned, empowered decisions.
 - They may be anxious about being deemed to be incapable of managing their affairs because they have become a victim – this is also a reason for under-reporting as they may have a fear of being removed from their home.
 - they are not aware they are a 'victim'.
 - victims are socially isolated with an absence of family to encourage reporting and may feel it is too trivial.
 - people in vulnerable circumstances may be put on so-called 'suckers lists' that are used and shared by fraudsters. This can lead to people being repeatedly targeted and becoming 'chronic victims'.
- 4.5 Tackling Fraud has been identified as one of the [Key Priorities for the Public Protection Service in the Strategic Assessment](#) 2021 - 24. The document sets out that the Service will continue to work with Thames Valley Police and specifically their fraud unit to address fraud. This work will include victim support and enforcement / intervention. Officers will continue to seek grant funding to support Level 2 / Level 3 fraud and unfair trading investigations and carry out operations to identify and tackle intellectual property crimes. The Service will also continue to undertake active media campaigns to raise awareness of fraud and the work we are undertaking to prevent it.
- 4.6 E-Crime has also been identified as one of the cross-cutting themes in the [PPP's Delivery Plan 2021-23](#). On-line trading has seen a significant increase in recent years, and this was accelerated by Covid and restrictions on high street trading creating more choice and convenience. The internet has been a vehicle for fraud, unfair trading, environmental crime and licensing breaches. The PPP looks for opportunities to tackle consumer and business detriment caused by eCrime across all its themes, priorities and projects.

PPP Resource with respect to Tackle Fraud and Unfair Trading

- 4.7 Fraud can range from crude to a highly sophisticated activity. To tackle fraud the response must be equally sophisticated, and a range of tools and expertise needs to be deployed.
- 4.8 The Public Protection Service delivery model is based on the 'National Intelligence Model'. Through this model we seek to tackle all areas of our work with a combination of preventative actions, intelligence gathering and analysis and enforcement. To this end, we have a strategic assessment and control strategy supported by a tactical tasking process which is of itself delivered through a number of specialist teams; trading standards, investigations (acquisitive crime) team, financial investigators and the case management and intelligence functions.

4.9 In addition, the service currently has a Fraud Victim Support Officer who assists victims of scams and their families with a range of preventative interventions and community engagement activities. This is supported by the PPP communications function and officers from trading standards and community engagement forming a dedicated scams team.

Prevention

4.10 Preventing residents and businesses becoming the victims of crimes including fraud and unfair trading is a key priority for the service. The PPP recognises that awareness and information is key in protecting residents from scams and fraud and it is important to educate consumers to be scam aware.

4.11 To this end we have a range of interventions in place including:

- Investigation of scams complaints and provision of advice.
- Installation of free telephone call blockers and video doorbells – these are actively promoted and a number of blockers are currently available for supply on a loan basis and installation. All free of charge and no cost to the resident. Wellbeing surveys are conducted before and after installation and these simple devices have been shown to make significant improvements to wellbeing and the resident feeling secure in their own home.
- Talks and scams presentations are made to local community groups
- Challenging banks under the 'Banking Protocol' to recoup monies for consumers (often successfully) where there may have been some identified failing.
- Training of bank staff focusing on signs to look out for when a customer may be at risk of financial abuse.
- No Cold Calling Zones:
[No Cold Calling Zones - PPP \(publicprotectionpartnership.org.uk\)](https://www.publicprotectionpartnership.org.uk)
- Provision of scams information and no cold calling door stickers
- Attending events partnering with TVP, banks and other agencies to raise awareness of scams and fraud.
- Ongoing programme of work with Citizens Advice – West Berkshire.
- Attendance and contribution to multi-agency meetings to help combat fraud.
- Networking with the Adult Social Care teams to raise awareness of what we do.
- Promote the national initiative Friends Against Scams:
<https://www.friendsagainstscams.org.uk/>

4.12 Communication also plays a significant role in preventative measures and our social media channels and website are actively used to highlight enforcement actions and to issue warnings to create a deterrent. Press releases are issued directly to the local media which are often recognised and published more widely. Examples of these can be found at **Appendix B**. In addition, we conduct regular radio interviews on the scams and fraud work conducted and our work in relation to romance scams has featured on BBC TV news reports.

4.13 We also participate in National Trading Standards Scams projects which includes the Friends Against Scams work and supporting victims identified through national and international enforcement measures. Recently we were able to return money to victims

following enforcement actions in the USA. More on these projects can be found here: [National Trading Standards Scams Team - National Trading Standards](#)

- 4.14 All of the staff within the Public Protection Service have safeguarding training including the identification of financial abuse. Where we believe someone is the victim of financial abuse e.g. so-called 'romance scams' we will work with the adult safeguarding teams to ensure the appropriate support and safeguards are put in place. Likewise, we receive regular referrals from social care colleagues and attend safeguarding forums to share ideas and best practice.
- 4.15 We also raise awareness of these issues and general unfair trading matters through briefings with police colleagues. At various times we have presented to TVP officers in the Response, Neighbourhood and CID teams. For many years we have also been involved in delivering the training for all PCSO's participating in the TVP training programme at Sulhampstead in recognition that it is often the neighbourhood teams on the ground that can play a big role in identifying possible fraudulent activities and unfair trading practices.
- 4.16 From time to time, we conduct proactive checks (often with TVP) to check on trading activity in the area. This is welcomed by residents as well as local traders who are concerned that the reputation of certain trading sectors is being damaged by 'rogue traders' thus affecting their legitimate business and operation.
- 4.17 Finally, we work with colleagues from community safety teams and partnerships to deliver against common objectives and in some cases access funding to support victims.

The Deployment of Intelligence

- 4.18 Credible intelligence is critical to tackling fraud and unfair trading. The biggest source of intelligence by far are members of the public who report matters directly to us or to our partner agencies such as TVP, Citizens Advice Consumer Line and Action Fraud. These reports are accessed through the data sharing agreements we have in place
- 4.19 It is these reports from residents, businesses and consumers that are often the trigger for an investigation. Every referral and notification from the national Citizens Advice Consumer Line and those directly entering the service (via email, telephone and web forms) are monitored on a daily basis. They are then considered in the context of the intelligence picture with a view to identifying any developing issues such as unfair or fraudulent trading activities. Every two weeks there is a tactical tasking process where the PPP's Intelligence Team raises areas of concern. Through this process the next steps are identified which can include advice and/or warnings to residents and businesses, appeals for further intelligence or reports and where deemed necessary the allocation of investigative resource, whether that be a cross service or multi-agency approach.
- 4.20 Once an investigation is commenced the intelligence picture is developed using a range of sophisticated techniques and packages that are able to connect nominals and assets. Often this involves the analysis of financial data as well the occasional use of communication data both of which can be obtained within a system of strict regulatory and (in the case of financial information) judicial oversight.

4.21 Finally, the service has a range of data sharing protocols which give us access to vital information. This includes access to material held on the Police National Database and the Police National Computer and also data sharing protocols with HMRC, DWP and the National Anti-Fraud Network. We also share an intelligence database with all other trading standards services, regional trading standards enforcement teams and the National Intelligence, Scams and eCrime units of National Trading Standards.

Enforcement - Level 1/2/3 Fraud and Unfair Trading

4.22 At any one time the service is investigating a significant volume of unfair trading and acquisitive crime matters including counterfeiting, fraud, money laundering and occasionally smuggling. Level 1 crimes (crimes where the victims are confined to the PPP geographical area) are primarily conducted by the Trading Standards Service. Level 2 (Regional) and Level 3 (National) crimes where we have victims inside and outside of the PPP area are investigated by a specialist investigation team comprised of Trading Standards Officers and Investigators who are solely dedicated to these highly complex matters.

4.23 Where there is evidence of offences inside and outside of the PPP then grant funding is sought from the National Trading Standards Board to progress these. Funding and other support mechanisms are also available from the Tri-Regional Investigation Function which covers the South-East, London and the East of England. This includes support for investigation work, expert witnesses, forensics and legal costs.

4.24 Day-to-day the service operates a Rapid Response Protocol with respect to Doorstep Crime incidents and officers will attend as soon as notification is received that a crime is in progress.

4.25 Often the service will work closely with other partners including TVP other trading standards services and regional crime units. Investigations often require arrests to be made and we work with a number of police services and these regional crime teams to arrest suspects where arrest criteria are met and it is necessary to further the investigation.

4.26 The Service has four staff accredited by the National Crime Agency to conduct and supervise investigations under the Proceeds of Crime Act 2002 into money laundering and where appropriate to conduct confiscation proceedings to recover the proceeds of crime. This includes the ability to restrain assets whilst proceedings are on-going. Judicial oversight of this work is undertaken by Reading Crown Court. We also have the support of a Financial Intelligence Analyst. Many suspects are identified by 'following the money'.

4.27 The service engages a wide variety of expertise whilst investigating matters. These can include expert witnesses e.g., chartered surveyors, vehicle examiners etc, along with computer and phone forensics experts, forensic accountants, handwriting and other forensic experts. Digital data can be critical and in the modern era we have seen several complex investigations built around digital and financial evidence.

4.28 Over the period of the PPP's existence, we have investigated a large range of complex fraud and unfair trading matters relating to a range of trading activities including second hand car sales, doorstep crime, advanced fee fraud, timeshare re-sale and the sale of puppies. The scale of these investigations has included levels of detriment ranging

from hundreds or thousands of pounds to multi-million-pound frauds and money laundering cases.

- 4.29 The Joint Case Management Unit supports the enforcement functions. Every investigation with a degree of complexity is allocated a lawyer from the unit from commencement. It may also be allocated to an Accredited Financial Investigator if appropriate. The unit provides a variety of roles which includes advising on the application of the law, checking procedural applications such as warrants, considering intelligence data applications and ultimately considering case files, applying the CPS tests around evidence and public interest and, should the case progress, conducting proceedings in the Courts or instructing and briefing external Counsel.
- 4.30 The Case Management Unit Manager also oversees the conduct of financial investigations and along with the Service Lead is able to authorise the making of judicial applications under the Proceeds of Crime Act 2002. Finally, we also have a specialist disclosure function to ensure our obligations under the Criminal Procedures and Investigations Act 1996 are fulfilled.
- 4.31 There are many examples of cases investigated which can be found on the Public Protection Partnership newsfeed. <https://publicprotectionpartnership.org.uk/news/> .

A very recent example of the successful investigation of a large and complex case can be found here: [Fraudulent builder sentenced to four years and three months immediate custodial sentence - PPP \(publicprotectionpartnership.org.uk\)](https://publicprotectionpartnership.org.uk/news/fraudulent-builder-sentenced-to-four-years-and-three-months-immediate-custodial-sentence-ppp)

5. Concluding Observations

- 5.1 Fraud is one of the biggest crime issues of our time. Although a crime as old as time it has become more sophisticated and many consumers are subject to frequent attempts to defraud them through all mediums, phishing emails, scam telephone calls and unsolicited doorstep traders. These can be professional and convincing and the vast majority of these frauds or attempted frauds remain unreported. We are all capable of falling victim to fraud and scams – everyone has moments of vulnerability where they are caught off-guard. Sadly, the majority of actual victims of fraud and unfair trading are often amongst the most vulnerable in our communities. For those most vulnerable, the effects of becoming a victim can be life-changing – losing large sums of money can impact on their financial security, there may be a loss of confidence and an on-going fear of further targeting. The effects can quite literally lead to the loss of independence and more reliance on support from family and the state. The impacts on mental health can be immeasurable.
- 5.2 This report sets out some of the steps the Public Protection Service is taking to protect residents and legitimate businesses. This work is delivered across Bracknell, West Berkshire and Wokingham under the various shared service arrangements. Our ability to deliver these levels of protection in the way we do is enhanced by those very arrangements and deliver on the original business case which includes pooling resources and developing expertise. That expertise is recognised both regionally and nationally.
- 5.3 It is proposed that given the importance and priority of this area of our work that we bring an annual report to the Committee.

6. Appendices

- 6.1 Appendix A – Coercion and control in financial abuse; learning from domestic abuse' NTS Report.
- 6.2 Appendix B – Samples of communication and community engagement relating to unfair trading and fraud.

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**National Trading Standards (NTS) Scams Team
'Coercion and control in financial abuse; learning
from domestic abuse'**

October 2022

Authors:

Jennifer Hawkswood

Dr Elisabeth Carter

Professor Keith Brown

Jennifer Hawkswood

My passion for tackling financial abuse comes from seeing first-hand the devastating impact it has on individuals, coupled with experiencing frustration in my own practice and those around me when trying to empower, support and protect victims. Having worked in adult safeguarding on the frontline for several years I often likened financial abuse investigations to 'wading through treacle' and felt an acute sense of something missing when it came to best practice examples and training. I have had the good fortune to collaborate with leading experts Professor Keith Brown, Dr Elisabeth Carter, and the National Scams Team in producing this report and I hope that it goes some way to providing both practical and theoretical guidance to everyone working to tackle this endemic problem.

Dr Elisabeth Carter

This publication addresses the stark reality of financial abuse in terms of prevalence, perpetrators, harm, and negative narratives around becoming a victim of this crime. Drawing on practitioner and academic expertise, this publication will take you through the key elements involved in financial and psychological abuse, and the effect this has on victims in terms of compelling them to comply with requests that will lead to their own exploitation. It is this apparent compliance that plays a big part in the misapprehension that financial abuse as somehow being the victim's fault; deepening the harm to the victim and creating barriers to reporting and access to sources of aftercare and support. For the first time, the links between financial abuse and other types of abuse (domestic violence and abuse, psychological abuse, grooming and coercive control) are made clear, and, crucially, this publication identifies how practitioners and organisations with a safeguarding duty can use this knowledge to improve practice in terms of safeguarding from financial abuse, and improving aftercare to better reflect the particular harms visited on victims of this crime and care and needs in recovery.

Professor Keith Brown

It has been a real delight and pleasure to work with Jennifer Hawkswood and Dr Elisabeth Carter to produce this new guidance looking at coercion and financial abuse. This is such an important area to raise both public and professional awareness in as the impact on victims is simply massive. Together we have a wealth of experience in these fields and over the years we have also become good friends as we work together in this area. So we have been delighted to produce this guidance for the National Trading Standards scams team. It is a genuine partnership of professionals committed to simply doing the 'Right Thing' and we trust this latest piece of work from us helps in the task of preventing this type of abuse and crime.

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Introduction

Fraud, scams and financial abuse devastate individual lives and costs the UK economy billions each year. The cost of scam victims' wellbeing has been calculated at £9.3 billion a year (Which 2021; BBC 2021) with figures for other types of financial abuse - such as that occurring in families - much harder to calculate. Recovering from financial abuse is especially problematic as it directly affects all other aspects of our lives - housing, health and wellbeing, employment, relationships.

There is growing awareness of the psychologically abusive elements of domestic abuse. In this report we will highlight that coercion and control is also prevalent in financial abuse. In doing so, we start to change perceptions about how we prevent and tackle financial abuse - including working with victims in a more empowering and less judgemental way. We will talk about how the language around scams can subtly blame the victim: asking 'why did they fall for it?' reminds us of the old 'why didn't they just leave?' approach to domestic abuse.

Shaming victims leads to stigma and underreporting which means we have minimal and poor-quality data in relation to financial abuse. We explain that we are only seeing the tip of the iceberg and the number of victims who have experienced financial abuse is far greater than current estimates. Lack of reporting leads to less priority and funding for tackling financial abuse. This leaves the door open for perpetrators to continue to wreak havoc in our lives and communities.

Our perceptions and the language we use about the nature and impact of financial abuse need updating. In this report we recommend that we need to draw on good practice from domestic abuse work to improve our strategies to reduce the risk and impact of financial abuse in our communities. The time to act is now – we have a 'perfect storm' of vulnerability coming our way. We have an ageing population including significant numbers of people living with cognitive decline, coupled with the Covid 19 pandemic and an increased cost of living. These factors are exacerbating already difficult situations for many. Financial abuse is set to continue to increase, and we cannot afford – literally – to under prioritise it.

Definitions

It is useful to highlight which **definitions and terms** we use in our work. The terms '**financial abuse**' and '**economic abuse**' have different connotations. Financial abuse is notably difficult to define: 'financial abuse can range from failure to access benefits, through inadvertent mismanagement and opportunistic exploitation to deliberate and targeted abuse, often accompanied by threats and intimidation' (Wilson and Brown 2003:11; Crosby et al 2008). It is recognised that the lack of definition of similar crimes such as rogue trading leads to uncertainty in recognising, reporting, evidence gathering and prosecution (Day 2015, 2019). The term economic abuse has been adopted by domestic abuse agencies as it 'covers the broad strata of financial harm previously understood under the term financial abuse but allows extension to cover issues involving coercive control' (Hourglass 2021: 5).

In our experience, '**scams**' and '**fraud**' are often used interchangeably. According to the Office of Fair Trading (OFT) 'there is no single commonly accepted or legal definition of a 'scam'. With no basic definition, there is room for interpretation as to what constitutes a scam, making objective measurement of their impact and prevalence more difficult' (OFT 2006: 11). However, OFT use a general definition of a scam as a 'misleading or deceptive business practice where you receive an unsolicited or uninvited contact (for example by email, letter, phone, or ad) and false promises are made to con you out of money'. (OFT 2006:11). We use their definition of scams in this report and use 'financial abuse' as an all-encompassing term for scams, all fraud affecting individuals and abuse involving money, goods, or assets within families.

We use our own term '**consumer vulnerability**' in a broad sense - referring to any situation in which an individual may be unable to engage effectively in a market and as a result, is at particularly high risk of getting a poor deal. This can be something as severe as becoming a victim of a crime or just not getting the best deal for them at the time. Situational vulnerability refers to the impact of financial abuse being amplified by the context in which it takes place. For example, being scammed and struggling more to pay your bills will have a higher impact during times of higher living costs.

We take our definition of **domestic abuse** from the legislation. The introduction of the Domestic Abuse Act 2021, brought with it a statutory definition of domestic abuse in UK law for the first time. Abuse is defined as "physical or sexual abuse, violence or threatening behaviour, controlling or coercive behaviour, economic abuse or psychological, emotional or other abuse" (CPS 2022). This applies if both people are aged 16 or over, and there is no upper age limit. The new definition is important as it 'emphasises that domestic abuse is not just physical violence, but can also take other forms such as emotional, controlling and coercive behaviour, and economic abuse' (CPS 2022).

Coercive and controlling behaviour is prevalent in both domestic and financial abuse. The UK Home Office definition of this behaviour is 'a range of acts designed to make a person subordinate and/or dependent by isolating them ... exploiting their resources and capacities for personal gain' (Home Office 2015).

There are differing opinions on using ‘**victim**’ versus ‘**survivor**’ and we believe this should be the choice of the individual who has experienced the abuse. Nevertheless, for this report we have chosen to use ‘victim’.

There are various terms to describe **the person acting abusively**. We use the term **perpetrator**.



The power of coercion and control

Coercion and control are used in both domestic and financial abuse. There are also differences in how agencies approach these concerns, and we seek to highlight this to learn from and utilise best practice.

How the abuse takes place

Victims of financial and domestic abuse will experience similar techniques used by perpetrators. In interviews with victims, Cross et al (2018) examined the links between romance fraud and domestic abuse ‘revealing similarities between the two in economic abuse, creation of fear, isolation, monopolization, degradation, psychological destabilization, emotional or interpersonal withdrawal and contingent expressions of love’ (Carter 2021: 284).

In their report on older victims of financial abuse, Age UK (2015) found that grooming takes place which is likely to involve ‘building friendship and trust, flattery, making victims feel indebted to them, as well seeking to isolate victims from their own networks’ (Age UK

2015:18). Grooming is a successful technique in the abuse of people - be it financial, domestic or both - because the victims feel the need to comply so strongly.

We know that domestic abuse escalates over time with the abuse forming patterns. Our experience of financial abuse is that it forms a similar pattern. This is supported by research into the financial abuse of older people, that it is 'a subtle, insidious crime that is much more likely to consist of a pattern of behaviour than a single incident' (Wilber and Reynolds 1996; Crosby et al 2008:16). We see this pattern of behaviour commonly in romance fraud which tends to happen over a longer period. 'Such scams have been described as offering a false relationship (Budd and Anderson 2009) and involve a scammer grooming an individual over time to make them believe that an emotional relationship exists, before the scam itself takes place' (Fenge and Lee 2018: 910).

Financial abuse may start as legitimate transactions with an escalation in cost and impact. As in domestic abuse, individuals may be (or feel) heavily reliant on perpetrators and don't want to risk losing relationships or support. 'When financial abuse co-occurs with physical abuse and/or neglect, it most often is committed by people living with the older person and seen as a carer or helper, yet they are often feared by the older person' (Jackson et al 2012; Davidson et al 2015:8). We see examples of perpetrators convincing victims that law enforcement and support agencies are seeking to harm the victim or remove their control over their own lives. During the Covid 19 pandemic loneliness and isolation became the norm for many of us - and for those in vulnerable circumstances the pandemic exacerbated this as perpetrators sought to use the national restrictions to their own advantage. Perpetrators in both abuses use isolation for the manipulation to remain secret and therefore effective. They may target people who are already isolated 'people who are more socially isolated may well be more vulnerable to fraud, for instance, if they have little chance to discuss matters with others' (Age UK 2015:11) or isolate people who were previously connected and supported by others. The grooming is often so successful victims isolate themselves. In their study of scam victims (OFT) found that 'it was striking how some scam victims kept their decision to respond private and avoided speaking about it with family members or friends. It was almost as if with some part of their minds, they knew that what they were doing was unwise, and they feared the confirmation of that that another person would have offered' (OFT 2009:7).

In Carter's (2021) study on victims of romance fraud, we see examples of perpetrators reacting strongly when victims say they have talked to loved ones, often using the reasoning that the loved ones might want to destroy the 'blossoming' relationship for their own gains. This embeds a 'culture of secrecy in their communications without explicitly demanding it and causing alarm. It also assigns the fraudster's actions as the responsibility of the victim, again similar to the manipulative behaviours of coercive control' (Home Office 2015; Carter 2021: 296).

Manipulation

Manipulation can be explicit or implicit - the latter is a technique used by perpetrators to narrow the victim's options by making them feel as if trying to protect themselves is a character flaw. For example, a victim could ask to meet a fraudster before handing over money or question their partner why they are asking for money. This is then portrayed by

the perpetrator as the victim being untrusting and creating conflict in an otherwise apparently harmonious relationship. 'Invoking guilt can provoke a need to 'make it up' to the aggressor (Baumeister et al 1995)...reminiscent of unrealistic expectations placed on victims of domestic abuse by their abusers' (Williamson 2010; Carter 2021:290).

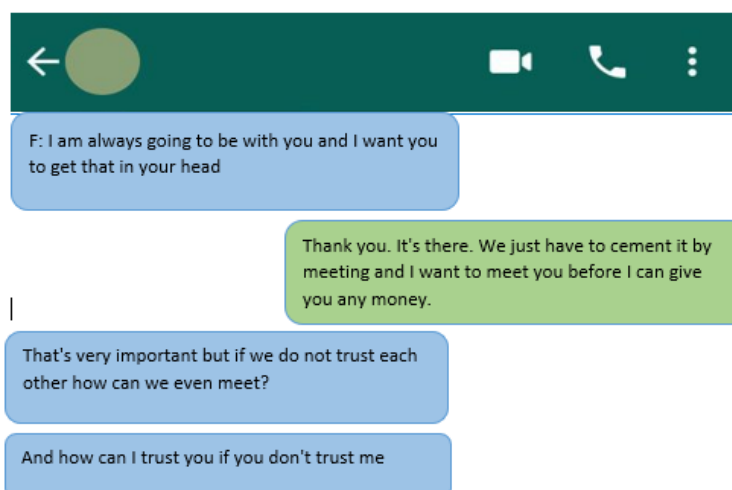
Gaslighting and distorted reality

A key tactic used in both domestic abuse and romance fraud is distorting the victim's reality. The victim is made to doubt themselves, and their recall of past events. It is a usually subtle form of emotional abuse. This could be information that appears to be innocent being introduced early in the relationship and then referred to with developments as time progresses, each time referred back to as truth, or outright denial of the truth by the perpetrator. This is at odds with the victims' version of reality, but the insidious and subtle nature of the tactic means they begin to think their version is wrong and the perpetrator's right- in a type of 'creeping normality' (Diamond 2005) where the victim is unable to recognise the situation is becoming unsafe (Carter 2021).

It is a successful technique because it creates an environment for the perpetrators of both types of abuse to 'cultivate a distorted version of reality where requests, demands and controlling behaviours are recast as calls to meet the ordinary requirements of attending to a relationship or the reasonable result of business ebbs and flows' (Carter 2021: 287).

In the example below, we see the victim attempting to protect themselves by asking to meet before money is sent. This is a legitimate request. However the fraudster twists this into an attack on the victim, claiming they (the fraudster) now can't trust the victim.

Example of romance fraud tactics



(Carter 2021)

Bombardment of the victim and visceral responses

Often called 'love bombing' in domestic abuse, this is where the victim is overwhelmed by attention from the perpetrator - compliments, gifts, treats, affection, increased communication. It is used to win over the victim's trust and affection and perpetrators will become angry if the victim does not give them sole attention. Perpetrators of both abuses use language that provokes immediate emotional responses from victims. These techniques 'often address basic human desires and needs (such as greed, fear, avoidance of physical pain, or to feel liked or loved). This can provoke basic visceral (intuitive) reactions' in the victim (Langenderfer and Shimp 2001; OFT 2009:26), but is also something that is replicated by perpetrators in order to appear vulnerable and draw a protective response and compliance from the victim (Carter, 2021).

Perpetrators may claim that their own life/health is at immediate risk and make the victim feel as though they are the only person who can help; drawing them further into the situation and towards the perpetrator. Likewise, they will often cut off communication suddenly to provoke anxiety in the victim - coined emotional or interpersonal withdrawal. 'Psychological abuse also involves passive tactics. Romance fraud offenders periodically cut off communication. This resulted in victims becoming anxious about the status of their relationship or the well-being of the offender' (ABC News 2018).

Phone scammers commonly call victims at night - when victims are more likely to be alone - and purposely causing insomnia and sleep deprivation to push the victim into an exhausted state where abuse and distortion of reality are easier to achieve.

This is part of a cycle of abuse where the other stages are tension building, eruption of anger/abuse, calm/love bombing stage/remorse. In scams we often see that an urgent response is apparently required, leaving no room for the victim to have breathing space to think.

Where the abuse takes place & who perpetrators are

The lack of physical proximity between perpetrators and victims is another area of similarity. In research about older people, financial abuse was stated to be different from other forms of abuse 'as it can occur remotely from the older person, is diverse in nature and is perpetrated in multiple ways' (Phelan et al 2018:933). Similarly economic abuse is particularly common post-separation as, unlike some other forms of abuse, 'the perpetrator does not need physical proximity in order to perpetrate this form of abuse' (Butt et al 2020:37).

There are more similarities to be found when we look at other types of financial abuse occurring in people's own homes - families defrauding, stealing and misappropriating funds from relatives. Domestic abuse is defined in the legislation as between two people who are 'personally connected' - perpetrators of financial abuse within families are clearly known to the victim. Hourglass's report on older people and economic abuse found that 'economic abuse appears to be usually committed in relative secrecy, and by trusted family members,

carers, or friends. The majority of perpetrators in Hourglass' data from 2020 were sons and/or daughters or other family members' (Hourglass 2020:7).

As in domestic abuse, financial abuse between family members can easily be reframed as a family spat, relatives fighting over money, debt, and therefore hard to spot. It can be even harder to identify for the individual - coming as it does from someone close to them. Because this type of abuse is not from the 'outside' it's often not seen as scary or damaging, whereas in reality, with abuse from inside your family or inside your home there is no escape. 'The most common location of abuse risk (is) the person's own home at 43.8% (Safeguarding Adults Collection (SAC) 2019-20) and most perpetrators of abuse are well known to their victim' (Brown et al 2021:17).



Victim blaming and shaming

Victims of financial abuse are often blamed, drawing a further parallel with domestic abuse. The adage 'why didn't they leave?' (an abusive relationship) translates to 'why did they fall for it?' (the scam). Victims can be labelled as naïve, stupid or greedy 'however, such labels are unhelpful and superficial generalisations that presume all of us are perfectly rational consumers, ignoring the fact that all of us are vulnerable to a persuasive approach at one time or another' (OFT 2009:5) This links to the need to recognise that vulnerability has evolved - it is situational, and our approaches have to evolve as it changes.

The language and labels we attach to abuse are important 'words such as "scam", "con", "swindle", "bamboozle" and "cheat" are sometimes used to describe fraud. The slang

nature of these terms can often hide the seriousness of the crimes they represent' (National Fraud Authority 2013; Age UK 2015:24). Similarly in domestic abuse, assault may be referred to as 'a domestic' 'an argument that got out of hand'. These terms downplay the significance and often criminal nature of the abuse. There can be a lack of understanding by the police and other agencies. This could be based on stereotypes about class - links to poverty, education (or perceived lack of). This is despite research showing we are all at risk of being scammed regardless of class. The narrative of blaming the victim is dangerous and misleading. It takes attention away from the cause of the problem - the perpetrator. 'Developing understandings of the crime by the victim's actions (or inactions) sits parallel with the victim-blaming perspective of rape culture, an historically prevalent narrative that now proliferates social media more readily than anti-victim-blaming messages (Stubbs-Richardson et al. 2018; Carter 2021: 285). Ironically, victims of particular types of financial abuse may be more likely to be financially literate in the first place, 'the more financially sophisticated a person is, the more likely they are to become a victim of investment fraud, highlighting the sophistication of fraudsters' (Age UK 2015:18). These findings were an echo of earlier research we found that suggested that 'scam victims often have better than average background knowledge in the area of the scam content' (OFT 2009:7).

The reason why frauds are so successful is nothing to do with the capabilities of the victim. It's to do with the fraudster's ability to groom people into thinking they're making good, reasonable choices and making reasoned, empowered decisions. 'The transformation from ordinarily unproblematic to apparently poor decision-making may not be due to the victim's over-romantic ideations (Lea et al. 2009a, Buchanan and Whitty 2013) but rather the skill of the fraudster' (Carter 2021:297).

We must realise that if individuals could see that they are being groomed and manipulated, it wouldn't happen in the first place. If the victim does realise their situation, deep feelings of shame can occur: 'why did I agree to it?' 'why didn't I trust myself?'. Victims may be anxious about being deemed to be incapable of managing their affairs because they have 'fallen for the trick', or simply not believed - especially prevalent in older generations - 'because of their age and perceived or real cognitive impairments, older people often find it hard to make other people believe them. Even the fear that this might be the case can be a disincentive to reporting abuse' (Davidson et al 2015:11). There are similarities here with domestic abuse victims who may be worried that unless they can evidence harm they won't be believed or are fearful that their abilities as a parent will be in question due to the relationship they have with a partner. Both act as barriers to accessing/accepting help. There may be more shame if 'romance' has been involved - feeling duped both financially and romantically.

Vulnerable circumstances and repeat victims

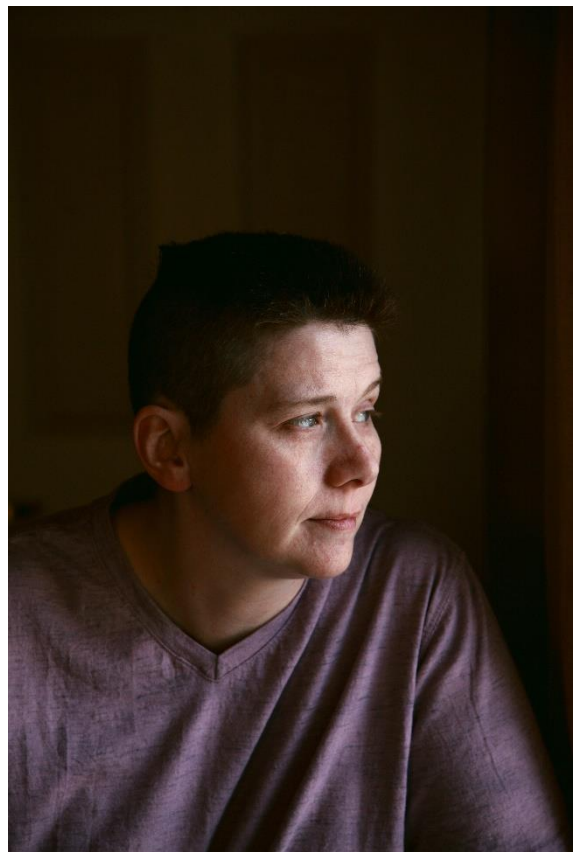
We all move in and out of vulnerable circumstances. Life events - bereavement, divorce, redundancy - these difficult events (and so many more) can increase anyone's susceptibility to financial abuse. The Covid 19 pandemic has brought with it a mental health crisis and an increased cost of living - and before that the UK had the Brexit uncertainty. These situational and marketplace vulnerabilities have increased the impact of financial abuse on victims, and caused further pressure on already struggling public services in dealing with the abuse and its impact. In addition, we know that people can be repeat victims of scamming. This can also be referred to as 'poly victimisation' or 'chronic victims'. We know in the case of scamming, 'people in vulnerable circumstances may be put on so-called 'suckers lists' that are used and shared by fraudsters...This can lead to people being repeatedly targeted...people becoming 'chronic victims' (Age UK 2015:7).

Such circumstances usually involve bereavement, loneliness and/or cognitive decline. 'Scammers use psychological insights to appeal to fundamental human needs and urges, and deliberately take advantage of the impact of personal circumstances, such as poverty or life transitions such as bereavement, which can undermine an individual's self-esteem leaving them vulnerable to exploitation' (Lee et al 2018a:50).

People who respond to scams may be placed on these lists which are sold on and lead to repeated targeting - 'nearly 200,000 people - with an average age of 74 - have been seen on so-called "suckers lists" circulated by fraudsters' (BBC 2015).OFT research in 2006 found that '52 per cent of victims had been targeted again by a scam and that, on average, a victim had a 30 per cent chance of falling for another scam within the following 12 months' [we note the use of 'falling for' as unhelpful language] (OFT 2006:40). Their research states that repeat victims are usually in declining mental health and/or isolated socially and elderly. 'Very often a chronic scam victim will not recognise that they have in fact been a victim of scams, even when confronted with overwhelming evidence...This phenomenon is sometimes referred to as the 'rationalisation trap', whereby the person cannot admit to themselves that they are the victim of a scam without making the psychologically painful admission that they have lost most of their money'(OFT 2006:40). There can be considerable difficulties for professionals in determining whether a victim is caught in this 'rationalisation trap' or lacks the capacity to make a relevant decision about ongoing scam involvement. This dilemma is covered later in this report.

We know that 'if a person's capacity is limited, compromised or fluctuating they may be at increased risk of abuse' (Brammer and Pritchard-Jones 2019; Lee et al 2020:15). In research by the Alzheimer's Society in 2011, they found that of those (people with dementia) surveyed, 76% experienced some difficulties in managing their money' (Alzheimer's Society 2011:20). It is unhelpful when people are asked to make important legitimate financial decisions on imperfect, unclear and inaccessible language. How financial institutions understand and support customers in vulnerable circumstances is worthy of further consideration.

How we talk to victims



We all need to challenge our traditional way of working with victims of financial abuse. We know from our experiences, supported by research, that the extent of grooming can be so significant the victim is experiencing a distorted reality and therefore our usual interventions are likely to be less effective. 'The analyses (of romance fraud examples) reveal communicative techniques that deviate from traditional prevention and awareness-raising efforts and align with practices of coercive control and domestic violence and abuse' (Carter 2021:287). Professionals need to be upskilled in communicating with those experiencing cognitive decline and coercion 'victims of financial scams often find it hard to talk about their experiences and an individual with dementia may be experiencing even more distress because they already have difficulties in communicating their experiences' (Fenge et al 2018:64).

We need to listen to victims, avoid telling them to end involvement with perpetrators - this is their decision - but do offer support with safe exit strategies instead. Taking time to acknowledge the victims' feelings, that they may have been intimidated and could be very frightened, the presence of shame and embarrassment. Just as ending/escaping an abusive relationship takes time, ending involvement in financial abuse is not a quick process and professionals need to be patient.

We know that it is much harder to help a victim of abuse (any type) extricate themselves once the relationship is established. We need to consider the usefulness of our preventative campaigns and literature for financial abuse with this in mind. 'The moment at which fraudsters ask for money is consistently the focal point of prevention and awareness-

raising literature. Common messages assume that the victim makes bad decisions within normal communicative frameworks and that they can step away from their entrenchment in an emotional manipulation in order to assess and remedy their situation' (Carter 2021:298).

If we start to see vulnerability as a temporary state (such as recent bereavement) this might help us to engage more productively with victims. Changes in adult social care terminology reflect this already - a move from 'vulnerable adults' to 'adults at risk' has taken place 'which moves the focus from notions of vulnerability, which has been associated with blaming the individual' (Lee et al 2018b:7). The presence of cognitive decline does not mean the victim was always vulnerable - or is beyond any financial capability now either. We also need to understand the marketplace we are living in, be aware of the evolving nature of financial abuse and design our services with the most vulnerable in mind.

Case study 'Tom'

Social services and Trading Standards visit Tom* who is 78 and lives alone after his wife died 2 years ago. He is a victim of an investment scam. He is adamant he has not been scammed and wants to continue his involvement. The workers explain that research shows that victims of investment scams are particularly financially savvy - and how the scammers keep using complimentary language to Tom in their emails. They explain that people who have been recently bereaved are often targeted, and Tom starts to see that he fits into both of these target audiences. Over time he talks about why he started responding - something to keep him busy and fill the long hours when he missed his wife - and agrees to have some time out of the house and feels he can leave it a bit longer before he responds next time the 'company' (scammers) get in touch. Workers check in with him after this delay and he tells them he didn't like the way the company called him so many times to chase payment and he's thinking twice about the 'investment' now. Here we can see Tom has started to create boundaries he feels comfortable with. He's started to see that perhaps this is not the right 'company' to invest in. He may never acknowledge he has been scammed but it is likely he will withdraw from giving them anymore money and be guarded next time a scammer contacts him.

The phrase 'good enough is good enough' comes to mind - are we expecting victims to come full circle and acknowledge the full extent of the financial abuse - are we allowing victims to successfully withdraw from engagement on their terms even if risk is not completely removed? In their (2018) study, Fenge and Lee found that there is an element of 'right person right time' - in these cases, professional intervention occurred at a time when the individual was ready to accept advice. However, for other participants, their loneliness and isolation were more enduring and impacted on their readiness to accept intervention to stop their contact with scammers' (Fenge and Lee 2018:913). What can we learn from domestic abuse best practice here? The importance of empathy, shared experiences and peer to peer support are vital and the recovery process for individuals needs attention.

Reporting

Financial abuse can also be a crime and yet we know that a large proportion is thought to be un-reported and responses to it differ according to postcode. 'FA (financial abuse) is under-researched, under-reported, under-recognised and under-prosecuted' (MetLife et al 2011; Phelan et al 2018:925).

Research by OFT in 2006 estimated 'less than five per cent of victims had reported the scam to the authorities' (OFT 2006:35). Action Fraud received 875,622 reports in 2020-21 (actionfraud.police.uk). The latest estimate from the Crime Survey of England and Wales (CSEW) is that there were 5.2 million fraud offences in the year ending December 2021 (ons.gov.uk). The crime survey is an estimate of all offences, not just those that are reported – but it relies on people recognising that they have been a victim, which we know is not always the case.

If financial abuse – of any type – is not reported, this means we are using poor-quality, small-scale research to base our policies on. We cannot have any confidence that our estimates of scale and impact are anywhere close and our projections for the future are wildly inaccurate as a result. Unless reports increase there will be little to no media coverage – leading to a public who are unaware of the significance of the problem. Surveys have shown that the public vastly underestimates the scale of fraud and does not recognise it as the crime they are most likely to experience. Professionals are also ill-equipped to meet the rising challenge of financial abuse.

Changes must also be made about how we expect people to report. If we use the example of romance fraud, we know anecdotally that it is more likely to be reported than scams targeting older people. This is because younger people are often targeted with this type of scam 'the average dating scam victim is aged 49 and loses £10,000' (Fenge et al 2018:125). The younger you are, the more capable you are of reporting (accessing online reporting tools, low levels of cognitive decline in younger populations). This leaves a risk that our data and preventative strategies will be focused on scams that affect younger people, ignoring the experiences and impact of older scam victims. We already know that the older you are, the less ability you have to recover money lost - no prospect of future earnings. You are less likely to be social media/online savvy and there may be less peer to peer support available to you.



Cost and public health implications

Estimates of cost should be seen as just the tip of the iceberg. It can be difficult to find up to date statistics - for example in 2017 the Home Office stated that 'it is estimated fraud costs individuals in the UK 6.8 billion a year - around £225 per household or over £100 per person' (Home Office 2017) but we know that fraud has increased since then.

A more recent estimate is that 'fraud losses equate to 137 billion' (Gee and Button 2021:7) in total in the UK.

Which? published a report on the link between scam victimisation and wellbeing. They estimate the additional non-financial wellbeing cost of scams at £9.3bn for 3.7m incidents of fraud between 2019-20 (Which?2021).

We know that fraud has increased under Covid 19. Research published found a '19.8% increase in fraud due to Covid 19' (Office for National Statistics; Gee and Button 2021:7) and the Victims Commissioner (2021) published the following statistics in relation to the issue:

- From March 2020 to March 2021, the volume of fraud incidents increased by almost a quarter (24%), in part due to a boom in Covid-related scams.
- 4.6 million people are affected by fraud each year
- 700,000 victims a year are likely to be highly vulnerable to fraudulent crime and seriously harmed by it
- Fraud now accounts for 39% of all crime

(Victims Commissioner 2021)

Calculating costs from financial abuse is complicated by there being short- and long-term implications, both for individuals and society. Victims may be unaware or unwilling to disclose the extent of their losses. Scams also stop people from having money to spend on purchases and their trust in legitimate businesses is damaged. There is a significant impact on public services, both in the increased likelihood of needing services and the cost of detection, investigation, and prosecution. In the case of adult social care, charges for care and support can be applied to individuals but if they have lost money through being victim to financial abuse and crime the local authority will be paying the bill. 'In cases where an individual's assets have been reduced through involvement with scams the local authority may be required to fund services, at a cost to the public purse' (Fenge et al 2018:45).

Financial abuse 'may also create an increased financial dependency on government welfare systems' (SCIE 2011; Fenge et al 2018), while 'abuse itself has been linked to higher rates of hospitalisations' (Dong and Simon 2013; Phelan et al 2018:926). Age UK's 2015 report references a study by Greater Manchester Police into the impact of doorstep crime on older victims which 'showed that their health declines faster than nonvictims of a similar age' (Age UK et al 2015:21). This is echoed in other studies - Barratt (2012) found that 40% of victims of doorstep crime report a change in their quality of life and Thornton et al (2006) found that 10% had unexplained admissions to hospital within three months of the burglary. In the two years following a distraction burglary, victims are almost 2.5 times

more likely to be in residential care or to have died than their nonvictim peers (Donaldson 2003; Fenge et al 2018).

In 2019 Trading Standards ran a Call Blocker Project targeting households receiving scam and nuisance phone calls and/or those who were susceptible to scams. Call blockers were applied with 99% of these calls being blocked. They found that applicants to the project had a considerably lower than average wellbeing score than the general population - this is before any intervention had taken place. After call blocker application, they found significant improvements to people's lives: 'average well-being scores had significantly increased bringing the sample in line with the general population... Less than 19% of vulnerable respondents and just 11% of those living alone remained on a low well-being score after three months' (Rosenorn-Lang et al 2020:2).

Their findings support the case for installing call blockers where people are receiving scam calls. Interestingly their project also highlighted how simply receiving these calls is detrimental to wellbeing - even when no money is lost.

Similarly, the National Trading Standards Doorstep Crime Project (2015) included a victim impact survey, which highlighted four significant impacts on health and well-being:

On a scale of 1 to 10, with 10 being the worst affected

- 50% rated the effect of the crime on them as between 6 and 10.
- 23% said it had affected their health.
- 38% said it had resulted in them having reduced confidence generally.
- 26% said it had left them feeling down or depressed.

(Fenge et al 2018:44)

If we use an average cost for a place at a care home of £1,500 per week, that is 75k per year just for one person. The cost implications to the public purse of those forced to move from their own home due to financial abuse are immense. We already have an ageing population and a struggling health/social care system - 'the profound and potentially long-term negative impact of scams on personal health and well-being makes scams a public health issue' (Fenge et al 2018:43).



This links clearly to the role of adult social care - and their challenges in meeting this need. Despite high levels of underreporting, they are already seeing significant numbers of safeguarding referrals 'financial abuse, including scamming, is the second most common form of abuse experienced by adults at risk (SCIE 2011) with 16% of safeguarding enquiries concerning financial and material abuse' (Adult Social Care Statistics 2016; Fenge et al 2018:53).

The legislation

Section 42 of the Care Act 2014 defines the local authority duty to act where there are adult safeguarding concerns. The criteria for a safeguarding enquiry is where the local authority has 'reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)

- (a) has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) is experiencing, or is at risk of, abuse or neglect, and
- (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The legislation specifically includes a description of financial abuse as including having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused (Care Act 2014). The accompanying guidance gives examples such as internet scamming, coercion in connection with wills, property, inheritance... 'and putting undue pressure on the older person to accept lower-cost/lower-quality services in order to preserve more financial resources to be passed to beneficiaries on death' (Davidson et al 2015:4).

The reason given for singling out this type of abuse for further explanation is 'for the avoidance of doubt because some definitions of abuse may not ordinarily include this type of abuse' (Care Act guidance 2014). This typifies the problem - financial abuse is often forgotten in the list of abuses despite its prevalence.

In determining if someone meets eligibility criteria for a safeguarding response, we may need to ask ourselves challenging questions about our understanding of financial abuse and the risk of it. Ash (2013) gives an example of a son regularly 'borrowing' his mother's money without repaying it. If she is dependent on him for care and support which in turns helps her stay in her own home (preventing the need for residential care) 'does this routine appropriation of cash become less abusive? Might it be expedient for social workers to 'overlook' a domestic situation which, if it collapsed, would present social services with dilemmas about how best to support an elder with complex needs in a resource-starved service world?' (Ash 2013:101).

The Care Act 2014 guidance directly links safeguarding responsibilities with scam involvement 'a scam, like any form of abuse, can be a one-off event or a longer-term interaction, resulting in chronic victimisation' (SCIE, 2011; Fenge and Lee 2018:908). However, if a scamming victim does not appear to have a need for care and support and is living independently in their own home, what role does adult social care have here? Is being a victim of scamming enough to incite a response?

Inherent in the Care Act 2014 are the duties to prevent the need for care and support and to promote wellbeing. This means that local authorities should always have a person's wellbeing in mind when making decisions and planning services, and must prevent needs from arising if they can. Financial abuse erodes people's money and assets, and impacts heavily on mental health and independence. A person may not appear to need services at the point of the abuse taking place - so would not be eligible for a safeguarding response necessarily - but by the end of the abuse they are far more likely to need support. At which point therefore should we expect local authority involvement? 'Within safeguarding practice, both a prevention focus and an early-intervention focus are imperative to enable the ability to respond as soon as possible in order to limit the exploitation of the older person's finances and/or property' (Phelan et al 2018:938).

In our experience local authorities and care providers deal with high levels of unpaid care fees. If a family member is responsible for paying the fees (from the person's own funds) but debts are occurring, it may be dealt with by a finance department initially - before being passed to the adult safeguarding service if debts continue. Our interest is in how long that process takes - and if is happening quickly enough to safeguard someone's finances - and if instead of handing over, joint working should be the norm. Social care staff confidence in discussing finances is highlighted in existing research 'the lack of training and expertise in both asking the older person about finances and being able to decipher what could be FA (financial abuse) was identified. This draws on a cultural reluctance and taboo to ask about private finances and this can be perceived as outside the remit of health and social care service' (Phelan et al 2018:936). In contrast, financial assessment teams may be

skilled in financial discussions but feeling out of depth with issues such as coercion and how they may be impacting on the financial situation.

For professionals tasked with supporting repeat victims, there can be considerable challenges in being able to differentiate between denial and an inability to decide. The Mental Capacity Act 2005 (MCA) provides a framework for deciding whether a person has or lacks capacity to make a decision and how decisions can be made in a person's best interests if required. The MCA 2005 is clear that people have the right to make unwise decisions and the Care Act 2014 reinforces the importance of 'Making Safeguarding Personal' - but both give little practical guidance on the issue of coercion impacting decision making. The code of practice for the MCA 2005 states that if an adult 'repeatedly makes unwise decisions which puts them at significant risk of harm or exploitation, or makes an unwise decision that is obviously irrational or out of character..... Further investigation regarding their capacity may be necessary' (Department for Constitutional Affairs 2007:25). We need to look at best practice in domestic abuse when we consider victims of financial abuse who appear to be making an unwise decision to continue to engage with the abuse. The impact of emotional abuse in the latter is often underestimated and assessing capacity in these scenarios is complex. We can also draw on examples from self-neglect here where people are apparently 'choosing' to live in ways that are harming them. Just as in those cases, capacity work has to be undertaken holistically. Decisions relating to financial abuse cannot be determined by a simple assessment of someone's understanding of coins, or their bank statement. If the money is being taken or misappropriated by a scam or a family member an element of grooming is likely to have taken place, so a distorted reality is in place. Undue influence needs to be considered in any assessment and opportunities for a breathing space away from the perpetrator sought to allow time for intervention to break through the distortion. It is also important not to make generalisations about cognitive impairments and abilities to manage finances 'Lichtenberg (2016) urges caution in making generalisations about cognitive impairment and financial decision-making ability, suggesting that each individual's right to autonomy be considered carefully in adult protection assessments. (Fenge and Lee 2018:911).

Returning to the earlier example from Ash (2013), if the woman cared for by her son was deemed to lack capacity in relation to the care, but clearly enjoyed the company of her son and wanted to stay in her home with his care, this poses challenges. Similar examples were discussed in another study of social care staff - 'the participants also indicated a dilemma where the older person could be 'happy' with the situation and there may be no negative physical or psychological symptoms, yet his/her finances are being used to fund the perpetrator's lifestyle and spend money without accountability' (Phelan et al 2018:935). In these cases what right do social workers (or others) have to insist on changes that could very well safeguard a person's finances and physical health - but make them miserable in the process and damage their relationship with family members. 'Consequently, there is a delicate balancing of outcomes and the need to maintain and sustain relationships can outweigh the desire to conserve finances' (Flynn 2007; Phelan et al 2018:935). In our experience there is often a lack of choice especially for older people. Faced with the apparent 'choices' of staying in an abusive relationship versus moving into residential care or receiving care at home from an agency with a high turnover of staff - many victims may 'choose' the former.

Successful ways of working

One example of a local authority's approach to tackling financial abuse and its associated debts is Norfolk County Council who have set up a team dedicated to making safeguarding enquiries about financial abuse. Although debt recovery is not the focus of the team, between 'August 2019 and August 2020 there has been a financial recovery to the local authority of £154,299.80 in one off payments and £19,338.09 in monthly payments' (Brown et al 2021:16). There are over three hundred local authorities in England alone, each trying to regain misappropriated funds and each experiencing their own financial hardship because of public sector cuts. We need more best practice examples like this to be shared and data captured.

Taking a strengths-based approach for financial abuse is likely to be effective. Understanding what increases someone's risk of the abuse is useful - but should be used with some caution to avoid labelling people as 'vulnerable' as if it were a permanent state - which for many, it isn't. If people have successfully avoided financial abuse for most of their lives, practitioners need to draw that out of them to build their self-esteem and resilience - or better still as a preventative tool when we come across the person in our day-to-day work. 'When considering involvement in a financial fraud or scam, it is therefore important to adopt a person-centred approach that acknowledges the intersection of various factors which contribute to individual vulnerability and individual assets which may support the individual to protect themselves and prevent victimisation' (Fenge and Lee 2018:909). Models that emphasise emotional vulnerability of victims 'tend to ignore the protective factors that older adults use to avoid financial exploitation (Ross et al., 2014). This suggests that practitioners should explore individual strengths and assets that support individuals to safeguard themselves' (Fenge and Lee 2018:911-12). This should include how we tackle loneliness and the perceived love/friendship between perpetrators and victims - both of which are central risk factors in financial abuse - and for adult social care this poses challenges in a resource starved world.

Using a trauma-informed approach in our work with victims of financial abuse helps us to avoid re-traumatising people - for example our use of language should not belittle or shame victims and should instead reassure, encourage and empower. Trauma informed approaches help practitioners to understand that the presenting issue may be as a result of how the victim has learnt to cope with life due to unprocessed trauma. This could be especially useful when working with repeat victims and we could again learn from self-neglect and domestic abuse best practice examples here.

In best practice examples, supporting victims to build resilience happens during a safeguarding process. In reality busy workers move onto the next crisis and this aftercare doesn't always happen. Our experiences are echoed in research: aftercare is rarely mentioned. The focus tends to be on prevention and identifying risk, with a notable lack of practical suggestions for how professionals should talk to victims and investigate financial abuse - including how to evidence it. This is despite repeated statements that the impact of financial abuse 'is often devastating in terms of future peace of mind and health. Victims can be left with damaged self-esteem and a reduced sense of self-worth. Victims suffer stress, anxiety and depression. Lives can be ruined' (OFT 2006:25). We know that in

domestic abuse victims often feel trapped due to legitimate fears about how they will survive financially. Furthermore economic and psychological abuse often continue long after an abusive domestic relationship has ended. More needs to be done to help victims recover from all types of abuse. Carter (2021) had similar findings ‘while there is significant public-facing material on how to identify fraudulent activity and protect oneself from becoming a victim of fraud, there is limited evidence through which to create effective barriers to victimhood and remediate harm’ (Irvin-Erickson and Ricks 2019; Carter 2021:284).

One positive example of resilience building is the training that Trading Standards offer to people who have been or are at risk of being scammed, through their ‘Friends Against Scams’ (FAS) programme. This free course offers people a chance to become ‘scam aware’ and to pass their learning onto others. Their recent survey found that ‘prior to completing the training, 17% of respondents had lost money to a scam, totaling £77,858. Since completing the training less than 1% had lost money, totaling £1,000. This is a 99% reduction in financial detriment to victims’ (FAS 2021:3).

A Friends Against Scams campaign found that for every Friend Against Scams £59 is the saving to the UK economy and ‘as of end of 2021, the total savings from people becoming Friends is over 51m’. (FAS 2021:3). Trading Standards have also trained their staff on the use of Cognitive Behavioural Therapy (CBT) to help staff challenge their own and victims’ harmful thinking about being scammed - with language playing a significant part in the technique. This uses a strengths-based approach to build resilience, and together with practical measures ends the cycle of repeat victims.



Police role and challenges

The Fraud Act 2006 created the following offences: fraud by false representation, fraud by failure to disclose information when there is a legal duty to do so and fraud by abuse of position (section 4). The latter can be an omission as well as an act purposely carried out. The perpetrator is in a position where they were expected 'to safeguard, or not to act against, the financial interests of another person', abused the position, dishonestly, intending to make a gain/cause a loss' (CPS 2020). This applies to financial abuse in families and that by carers, people who hold power of attorney or deputyship. Under section 4 we see there are crossovers with theft legislation and the Court of Protection's (non-criminal) powers to remove attorneys and deputies acting abusively.

The key question here is how is the law being applied to cases of scams and financial abuse by family members? As one Age UK report stated 'there is a lack of understanding about financial abuse across police services, so reports can be turned away at the front desk, especially if they do not see it as very serious or involving large amounts of money' (Davidson et al 2015:17). The report goes on to suggest that more training is required for all agencies including how the police could collect evidence. The lack of prosecutions is highlighted in other research, with safeguarding staff indicating challenges in dealing with financial abuse are 'compounded by the fact that investigating and prosecuting FA (financial abuse) take time, which is limited in the busy caseloads of staff and resource demands' (Phelan et al 2018:932). According to the victim's commissioner, only '2% of police resources are allocated to fraud, with fewer than 8,000 prosecutions in 2019' (Victims Commissioner 2021).

We know that the police have made significant progress in their understanding and attitudes to domestic abuse, highlighted by the Coercive and Controlling Behaviour criminal legislation now in place. There is a growing understanding of economic abuse as part of domestic abuse which should be celebrated. We seek to replicate those successes in the financial abuse field.

Trading standards role and challenges

In many areas Trading Standards, police and adult social care departments work closely together. Joint working enables a sharing of knowledge, specialisms and skill. When repeat victims are of concern a multi-disciplinary approach is key. Not all areas across the country work in this joined up way and we see a clear need for increased multi-agency taskforces. Trading Standards staff are skilled in tackling the perpetrators head on - and play an important role in educating the public to be scam aware. Building on this good practice is the need to support their staff with using the Mental Capacity Act 2005, and how to work with victims using trauma and strengths-based approaches. In turn they have much to offer to adult social care staff on the types, nature and impact of scams and fraud. Training for both workforces should include focus on the psychological aspects of financial abuse - the grooming and isolation, and the impact of undue influence on decision making.

Practical changes we can make

There are clear similarities in how perpetrators of domestic and financial abuse act, and the long-term impacts of these abuses. However, there is significant disparity in how these two abuses are tackled by organisations. What best practice in domestic abuse can we learn from and replicate for financial abuse?

Multi agency tools



Within domestic abuse the Domestic Abuse Stalking and Harassment (DASH) risk assessment is used by agencies across the UK to define risk of domestic abuse and prompt possible further multi agency action. In financial abuse there are existing tools - The Older Adult Financial Abuse Measure and the Lichtenberg Financial Decision Screening Scale - but these are anecdotally not widely used. Existing research highlights the potential usefulness of such tools 'as professional knowledge and understanding of the risks posed by financial exploitation of older people increase, new tools that support understanding of the complexities of financial decision making may aid professional understanding of individual vulnerability' (Fenge and Lee 2018:918). There is certainly an argument for further exploration of current UK use of such tools within and between agencies 'having detection systems in place, such as using the Older Adult Financial Exploitation Measure (Conrad et al., 2010), can both alert to the suspicion of FA (financial abuse), but also stimulate a conversation to increase the older person's awareness' (Phelan et al 2018:927). Similarly, we discussed earlier the complexity of assessing capacity in relation to financial abuse and it is likely that in these scenarios multi agency input would be beneficial 'requesting joint

assessments and transdisciplinary case discussions can address difficulties...and promote a unified care plan. In this way, FA (financial abuse) can be more comprehensively addressed and older people and their assets protected, where necessary' (Phelan et al 2018:938).

In addition to standardised assessments, we can also learn from multi agency strategies in domestic abuse work. Multi Agency Risk Assessment Conferences (MARAC) are standardised multiagency meetings which consider cases of high-risk domestic abuse in the local area. There are all relevant agencies in attendance including advocates for the victims. The purpose is to share relevant information to gauge nature and level of risk and agree what support/actions to offer. In dealing with scams and fraud there are numerous organisations involved; Trading Standards, Action Fraud, police departments (the latter often focusing on large scale financial crime though) and adult safeguarding services. However, they often work in silo, without the structure of multi-agency working being embedded in practice. Despite this, there are good examples emerging of multi-agency working in relation to fraud. While they differ in form, these approaches aim to bring together the public and third sector agencies that work to prevent fraud and support victims to create a more joined-up approach. A pilot in North Yorkshire and Lincolnshire supported by National Trading Standards demonstrated the effectiveness of greater multi-agency working – over two years the pilots saved £8m for individuals and society. Both areas delivered more consistent victim support, better intelligence and investigations, and reached more people in their local communities with clear and consistent prevention messages. Bringing together limited resources and pooling expertise in this way can ensure that victims get the right level of support from the right agency first time. This approach is now being rolled out to all police force areas in England and Wales with the support of National Trading Standards.

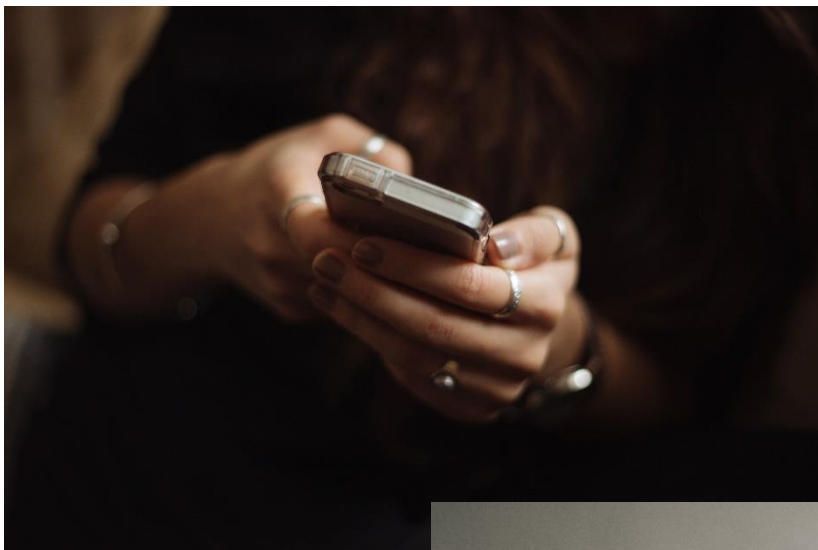
Where financial abuse is perpetrated by a family member, there is less resource to call on. Cases of this nature tend to be dealt with almost entirely by local authorities with some handled by the Office of the Public Guardian (OPG) if it involves abuse of power of attorney or deputyship. Where there are crossovers between agencies in terms of responsibilities this can lead to victims falling through gaps - each agency thinking the other is handling the situation. Wilson et al. (2003) explore the links between the Office of the Public Guardian and social services. They found a risk 'that (they) work in isolation from each other... In some cases overlapping responsibilities might provide additional protection but there is also potential for gaps to appear where roles are unclear'. They recommend 'increased collaboration...misunderstandings can easily occur when work is jointly undertaken across boundaries' (Crosby et al 2008:30). Similarly, under section 4 of the Fraud Act 2006 there are also crossovers with criminal legislation and the Court of Protection's (non-criminal) powers to remove attorneys and deputies acting abusively.

Safeguarding boards

One way to address crossovers and increase multiagency working would be to use Adult Safeguarding Boards. Section 43 of the Care Act 2014 requires every local authority in England and Wales to establish a board which acts strategically to support adult safeguarding arrangements in its area through a multi-agency approach with partners. In

their 2015 report, Age UK recommended that ‘financial abuse should be a more proactive part of Safeguarding Boards’ remit’ (Davidson et al 2015:17). Key partners already attend - the police, health, adult social care. Currently Trading Standards can be invited to attend - but their participation is likely limited due to pressures on small teams.

We know that financial abuse has significant public health implications - financial abuse victims commonly experience mental health deterioration after or during the abuse, and studies indicate this can lead to earlier admissions to care homes, more reliance on the NHS. ‘Elderly victims are 2.4 times more likely to die or go into a care home than those who are not scammed’ (National Trading Standards Scam Team 2019:2). The longer term impact of this often hidden abuse needs to be recognised by safeguarding boards who have a strategic and useful role to play in spreading awareness, collecting and analysing data and supporting key agencies to act efficiently in cases of financial abuse. Many safeguarding boards will choose a safeguarding area to prioritise for the following year, such as domestic abuse or self-neglect. We encourage safeguarding adults boards to ensure that scams and fraud, particularly in the context of coercive control, is made one of their priority areas. The impact of this type of activity is massive and wreaks havoc in citizens lives and thus we must do all we possibly can to raise awareness and reduce this type of crime.



Conclusion

There are clear parallels in the way perpetrators of both financial and domestic abuse use coercion and control. We know that financial abuse ruins lives and despite underreporting, it is one of the most commonly reported concerns across agencies. Our report shows that traditional approaches to financial abuse need to be updated and our professional workforces upskilled to meet this challenge. We know it is chronically underreported and the implications of that are far reaching. Our estimates at the cost of financial abuse are likely to be far below the actual numbers and we must urge policy makers to take this into account. We argue that there is room for consideration of more effective, standardised multi-agency assessments and processes, and wider attention given to the public health implications. Good practice examples are out there already to learn from - Friends Against Scams, dedicated teams within local authorities on tackling financial abuse - but these are few and far between. We know that the police and other agencies have adopted new and refreshing approaches to tackling domestic abuse and this report argues we need to learn from and mirror those examples. We recommend that adult safeguarding boards take an active role, using their unique skill set and strategic oversight to tackle financial abuse in their communities and contribute to national work in the area.

We have highlighted the importance of changing the language we use with victims of all types of financial abuse and the need to increase our capabilities in both prevention and building resilience. What steps can we take to challenge our own and public perceptions about families feeling entitled to an inheritance, or assumptions that only naïve or greedy people are victim to scams? We ask for special attention to be given to repeat victims and we must all work together to better understand and be able to offer protection to that oft-invisible group. We acknowledge that there is also learning to be had regarding culture, ethnicity and gender relating to financial abuse. This is worthy of an entire report in itself, we have chosen to concentrate on age as the dominant consideration for this work - but those areas need further exploration too.

Ultimately we draw attention to the ways in which we can all work together to improve our awareness of financial abuse and leave no stone unturned in our explorations of the nature and impact of this devastating abuse.

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Tackling Fraud and Unfair Trading

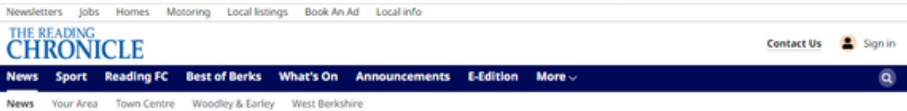
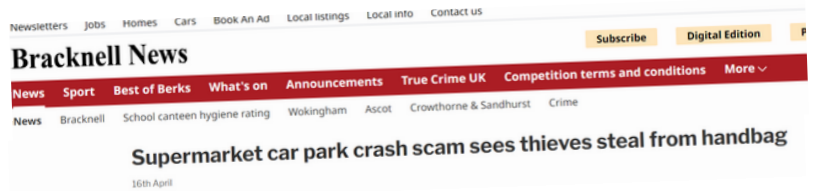
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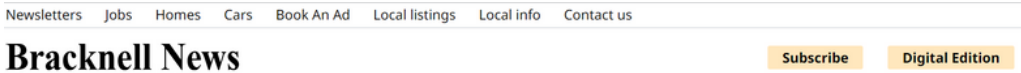


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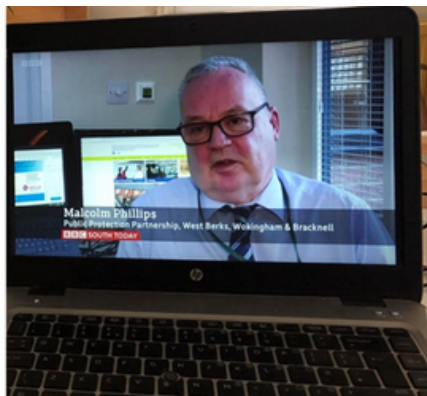


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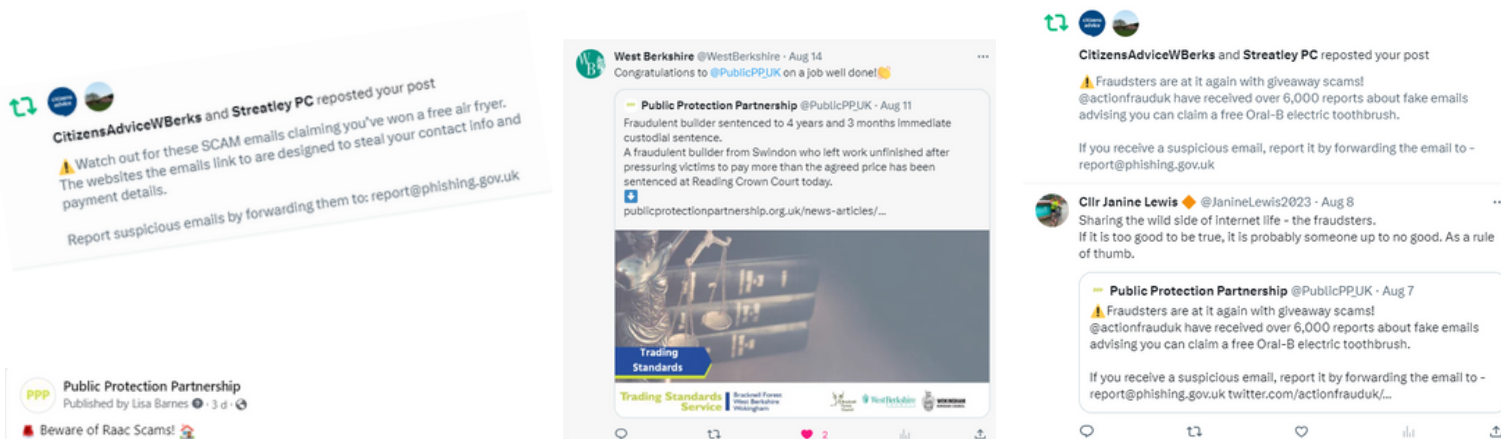
Radio Coverage on BBC Radio Berkshire over past 12 months on topics such as counterfeit and illegal vapes, romance scams, latest scam alerts, counterfeit mobile phones

Page 101 and mobile phone products.

Tackling Fraud and Unfair Trading

Small snapshot below of our social media output on fraud and scams. Includes shares from other organisations of our posts which increase our reach.

There are multiple posts on both Twitter and Facebook from PPP on scams / fraud every week. Includes the latest scams on 'RAAC' related scams targeting homeowners.



Public Protection Partnership
Published by Lisa Barnes · 3 d ·

Beware of Raac Scams!

Chartered Trading Standards Institute lead officer, Katherine Hart, has raised concerns about scams related to the Reinforced Autoclaved Aerated Concrete (Raac) issues that are causing school disruptions due to facility concerns. Scammers/Rogues are targeting unsuspecting homeowners through cold calls, claiming that their buildings might be affected by Raac-related problems. They're offering surveys for a cost of around £250 and suggesting that im... See more



Examples of posters we've used that highlight potential scams / counterfeits.



Revenue Budget 2024/25 including Proposed Fees and Charges Schedule

Committee considering report:	Joint Public Protection Committee
Date of Committee:	2 October 2023
Chair of Committee:	Councillor Lee Dillon
Date JMB agreed report:	22 September 2023
Report Author:	Sean Murphy
Forward Plan Ref:	JPPC4252

1. Purpose of the Report

- 1.1 To set out the Public Protection Partnership's (PPP) draft revenue budget for 2024/25, including discretionary fees and charges for 2024/25.
- 1.2 To seek approval for the draft budget and draft fees and charges schedule prior to submission to Bracknell Forest and West Berkshire Councils as part of their budget setting process in accordance with the Inter-Authority Agreement (IAA).
- 1.3 To agree the figure for the basis of the recharge to Wokingham Borough Council with respect to the services jointly Wokingham Borough Council under the shared service agreement effective on the 1st April 2022.

2. Recommendations

The Committee:

- 2.1 **CONSIDERS** the draft revenue budget including the fees and charges set out in this report.
- 2.2 **RECOMMENDS** to partner Councils the contributions set out in column three of the table at 5.23 form the basis of the 2024/25 net revenue budget contributions.
- 2.3 **NOTES** the pressures set out in columns four and five in the table at 5.23.
- 2.3 **APPROVES** the fees and charges set out in Appendix A.
- 2.3 **APPROVES** the contribution request from Wokingham Borough Council to be as set out in column three of 5.23 below.
- 2.4 **AGREES** that the policy position in relation to monies received under the Asset Recovery Incentivisation Scheme (ARIS) (which was approved at [14th March 2017 JPPC meeting](#)) remains the policy to be applied to spend / allocation of any monies received under the scheme.

3. Implications and Impact Assessment

Implication	Commentary
Financial:	<p>The base budget requirement to fund the service is set out at 5.23 below.</p> <p>The fees and charges proposed are set out in Appendix A to this report. These are either statutory fees where any variance will have been set by law or discretionary fees. In respect of the discretionary fees these are based on the principle of full cost recovery agreed previously by this Committee.</p> <p>For the avoidance of doubt any grant funding received under the Proceeds of Crime Asset Recovery Incentivisation Scheme does not form part of the PPP revenue budget. This has been agreed by the Committee at the 14 March 2017 meeting.</p>
Human Resource:	<p>The base budget funding set out at 5.23 will be required to maintain the current structure at 2023/24 levels. Any funding level set below the full base will need to be found from a reduction in staffing levels which includes a number of vacant posts.</p>
Legal:	<p>The IAA (Inter-Authority Agreement) that set up the Partnership effectively delegates responsibility for the strategic direction of the PPP to the Joint Public Protection Committee. The responsibilities of the committee are set out in Schedule 1 to the agreement.</p> <p>The IAA with Wokingham requires that we indicate the level of contribution required from Wokingham early enough for it to feed into their budget setting cycle.</p> <p>Included is the responsibility to propose a fee structure and annual budget to the partner Councils and agree any variations to the budget.</p> <p>The Committee also has the responsibility to set out a proposal for the agreed percentage figures for each authority. The agreement requires that these should be submitted by 30th November in year preceding the effective implementation date or other such date agreed by the Councils.</p> <p>It remains at all times the responsibility of the partner Councils to set their own budgets including fees and charges having received the recommendation of the Committee.</p> <p>There are statutory consultation requirements associated with the fees and charges for hackney carriage and private hire drivers, vehicles and operators. These are set out in Sections 53</p>

	and 70 of the Local Government (Miscellaneous Provisions) Act 1976. Any variations to these fees will be consulted on in accordance with the legislation and will be discussed at the Licensing Committees of the partner organisations prior to recommendations being made to the Budget Council meetings of the two authorities.			
Risk Management:	Any risks associated with the recommendations will be captured as part of regular Joint Management Board briefing process and will be escalated as per the IAA and Committee approved Business Plan.			
Property:	There are no direct property implications arising from this report.			
Policy:	<p>The Committee has responsibility for setting the strategic direction and policy of the PPP. This includes the maintenance of financial oversight to ensure sound financial management. More specifically the Committee has responsibility for recommending to the Councils a budget that meets its needs along with a proposal for fees and charges.</p> <p>Updates on the financial position are presented to the Committee as part of the quarterly performance monitoring regime.</p>			
	Positive	Neutral	Negative	Commentary
Equalities Impact:				
A Are there any aspects of the proposed decision, including how it is delivered or accessed, that could impact on inequality?		x		Where any decisions are made to change service provision individual impact assessments will be undertaken. There are currently no proposals to disinvest from any services already provided.
B Will the proposed decision have an impact upon the lives of people with protected characteristics, including employees and service users?		x		None

Environmental Impact:	X		The service plays a significant role in the protection of the environment including air quality, land contamination, planning considerations and enforcement of green energy claims. The proposals in this report if accepted will maintain capacity in this area.
Health Impact:	X		A significant number of the Partnership's Service Priorities relate to protecting and improving health. These included food safety and standards, health and safety, tackling fraud, air quality and private sector housing. If this activity continues to be funded there will be a continuing positive impact on the health of residents and visitors to Bracknell Forest and West Berkshire.
ICT or Digital Services Impact:		x	None Albeit that the Service will continue to promote initiatives on its social media platforms and website.
PPP Priorities :		x	<p>PPP Priorities:</p> <ol style="list-style-type: none"> 1. Alcohol and Tobacco Harm Reduction 2. Animal Welfare 3. Cost of Living 4. Environmental Protection 5. Food Safety and Standards 6. Health and Safety Enforcement 7. Housing Standards in the Private Rental Sector 8. Impact of Nuisance on Residents and Communities 9. Improved Air Quality 10. Licensing 11. Nutrition and Childhood Obesity 12. Service Improvement 13. Tackling Fraud 14. Unsafe Consumer Goods <p>The work of the PPP will support the Council priorities in both the partner authorities.</p>
Data Impact:		X	This decision about budget setting will not have a significant impact on the rights of data subjects

Consultation and Engagement:	<p>The fees for Taxis and Private Hire Vehicles and Private Hire operators will be subject to statutory consultation.</p> <p>The remainder of the fees and charges will be subjected to any budgetary consultation exercises undertaken by the partner authorities.</p>
Other Options Considered:	<p>The Councils are currently still considering their wider revenue budgets for 2024/25. Should either of the Councils seek to disinvest in this area of service there is a methodology agreed (by JPPC) for doing so.</p>

4. Executive Summary

- 4.1 The Inter-Authority Agreement (IAA) between the Councils sets out the functions that are delegated to the Joint Public Protection Committee (JPPC) under the terms of the agreement. To deliver these functions for the Councils they are requested on an annual basis to allocate a budget to be overseen by the JPPC. That process being that a budget is proposed by the Committee along with a proposed schedule of fees and charges. The total net revenue budget for the service is then shared between the Councils in the agreed percentages. This percentage split and budget proposals are required to be provided to the partner organisations by the 30th November each year.
- 4.2 All partner Councils are facing unprecedented pressures on revenue budgets both in year and in future years. This report is being prepared in both the context of the in-year pressures and the fact that we are at an early stage in the 2024/25 budget setting cycle at a time of significant uncertainty and challenges. Consequently, the Committee is being asked to consider the coming year's budget over two meeting cycles. This report sets out the allocations needed to maintain the current service / staffing levels along with recommended allocations based on assumptions that income and salary deficit pressures will not be funded with an indication of the pressures built into those allocation assumptions. It is proposed we return to the Committee in December with a further report detailing what mitigations will be applied to manage the deficit.
- 4.3 The revenue budget and fees and charges are then subjected to the budgetary consultation and agreement processes of the individual authorities. Additionally, the proposed fees and charges for hackney carriage and private hire vehicles and operators are subject to the consultation requirements in Sections 53 and 70 of the Local Government (Miscellaneous Provisions) Act 1976. Prior to statutory consultation the licensing fees and charges will be subject to consideration by the respecting Licensing Committees prior to the commencement of the consultation. The Committee's will then be asked to consider any responses before recommending a final set of fees and charges to each Executive and Full Council.

5. Supporting Information

Introduction

- 5.1 The funding arrangements for the service are set out in two Inter-Authority Agreements (IAA's). The agreement of the 6th January 2017 sets out the arrangements for the West Berkshire and Bracknell Forest budget contributions and the fee setting processes. The IAA of the 1st July 2022 sets out the delivery arrangements for those services

shared with Wokingham Borough Council. Both agreements set out an array of statutory functions to be delivered jointly. In the case of Bracknell Forest and West Berkshire these include private sector housing, nuisance, environmental protection, licensing, trading standards, case management, financial investigations, intelligence, food safety and standards and health and safety. In the case of the Wokingham IAA the services covered include trading standards, case management, financial investigations, and air quality.

- 5.2 The two IAA's also identify the key priority areas for the delivery of the services. In the case of the BFC and WBDC agreement these are community protection; protection and improving health; protection of the environment; supporting prosperity and economic growth and partnership working.
- 5.3 To discharge these functions, the partner Councils are requested on an annual basis to allocate a budget to the Committee. That budget is proposed by the Committee along with a proposed schedule of fees and charges. In the case of BFC and WBDC the total net revenue budget for the service is then divided between the Councils in the agreed percentages. Those agreed percentages are based on workload split which is linked to a range of factors including population and number of businesses liable to regulatory activity.
- 5.4 The percentages for 2024/25 are as follows:
- (a) Bracknell Forest 39.25%
 - (b) West Berkshire 60.75%
- 5.5 The IAA with Wokingham Borough Council is linked to their share of the costs of those services delivered on a shared basis as set out in 5.1 above.

Preparation of the 2024/25 Budget

- 5.6 The IAA sets the budget requirements of each authority based on the principle of 'agreed percentages'. The proposed percentage splits are set out in paragraph 5.4 above.
- 5.7 The net revenue budget for 2024/25 required if all of the pressures were met is set out in column 6 of the table at 5.23. This includes the Wokingham contribution. In preparing its recommended budget the Committee is required to consider the following matters:
- The previous expenditure of the PPP and the service levels achieved,
 - Any proposals for the development of the PPP and the services it offers,
 - Any material changes to the activities of the PPP,
 - Any other matters relevant from time to time,
 - Development and impact of any efficiencies that could lead to reduced costs, and
 - Consider any investment required to realise these efficiencies.

- 5.8 The net revenue budget for 2024/25 has been calculated taking into account:
- Salary cost of living rises;
 - Staff incremental points effective from at 1st April 2024;
 - Any pension and NI adjustments arising from the cost of living salary increases.
- 5.9 Any changes in year due to recruitment, staff qualification and progression or maternity etc. will be managed within the budget allocated by the Councils.
- 5.10 There has been no inflationary increase with respect to supplies and services. This element of the budget has not seen any inflationary increase since the shared service was formed in 2017.

Budget Pressures

- 5.11 The following pressures have been included in the 'stand-still' budget figures set out in column 6 of table set out at 5.23 below:
- Salary pressures arising from the decision by Wokingham to leave the Partnership on the 31st March 2022. The total pressure has now risen to £291K per annum.
 - Inflation arising primarily from salary adjustments amounting to £182.15K.
 - Income shortfall of £98K.
- 5.12 The income pressures are primarily due to the loss of licensing income from the 2019/20 base.

Mitigations

- 5.13 Based on the assumption that some, or all, of the pressures may not be funded then it is proposed to return to Committee in December 2023 and set out how the budget has been mitigated to provide a balanced budget for 2024/25. The options under consideration include:
- Deletion of some or all vacancies.
 - Seeking further grant funding and deploying staff to grant funded work.
 - Further shared service / contractual relationships with other Councils.
 - 'Invest to save' growth bids in areas such as empty homes etc.
 - Service restructure.
- 5.14 Whichever of these or any other options are followed there will need to be a refocus of the service around its new budget base which will inevitably lead to some need for re-prioritisation of the service. This will be a matter for the Committee and again, options will be set out in the December paper. Which, if any, of the vacancies that can or should be deleted will need to be considered in the context of those priorities and any emerging pressures. It doesn't follow that service reduction automatically falls where the vacancies fall. Staff will of course be consulted on any changes that affect them

and any requirement for structural change will be conducted in accordance with West Berkshire change management procedures.

5.15 In December 2017 JPPC determined that as a matter of principle that all discretionary fees and charges should be set on the basis of full cost recovery, and this would be reflected in the service 'hourly rate' which would be the basis of fee setting. The hourly rates set year on year were:

- 2018/19 - £55
- 2019/20 - £57
- 2020/21 - £57
- 2021/22 - £59
- 2022/23 - £64

For the financial year 2024/25 the proposed hourly rate is £68.25. This increase is based on headline CPI for the year to August 2023 which was confirmed by the Office for National Statistics to be 6.7%.

5.16 In calculating this hourly rate, a range of factors have been considered including the wide variety of council support service costs, staffing and associated costs, democracy and governance, contracts and the necessary training to maintain a competent workforce.

5.17 Over the last few years discretionary fees and charges have been reviewed and are now aligned across Bracknell and West Berkshire to reflect the fact that licensing procedures and systems are largely aligned.

5.18 A new IT system has been procured and is largely implemented. All licensing records are now maintained on one cloud-based system meaning all relevant staff can access records regardless of base or which council provides network access. In due course the system is expected to deliver efficiencies and improved communication for service users with automated reminders and a one stop application process via an on-line portal. The implementation for licensing has been problematic particularly around data transfer but we are resolving matters.

5.19 As stated above statutory consultations for taxi and private hire vehicles and private hire operator fees would be conducted as a matter of course in both authority areas. The nature of those consultations will be agreed by the relevant Licensing Committee but will include the publication of public notices and direct consultation of drivers, owners and operators. It is worth noting that there is a separate annual consultation on taxi fares and the increase in fees are considered as part of that process. In the last three years fares have increased as follows:

	2021	2022	2023
Bracknell Forest	13%	14%	None
West Berkshire	5%	8%	7.5%

- 5.20 A fee-based remittance scheme in respect of hackney carriage and private hire vehicle licences for both electric and hybrid vehicles was introduced on the 01 April 2023 in West Berkshire. This scheme, which will initially remain in place for three years, is funded as part of the wider environmental agenda.
- 5.21 It is proposed that the mid-term inspection fee for Home Boarders be included in the base fee. The inclusion of the mid-term inspection avoids us having to have in place a separate collection arrangement.
- 5.22 The fees and charges set by Regulation / Statute in the schedule are shown at this 2023/24 levels. These will be adjusted as any variations are made in legislation. Licensing Act 2003 charges have not increased for over a decade which has also added to the growing gap between costs and income.

Proposals

- 5.23 The proposed revenue budget for 2024/25 in column two is inclusive of the pressures set out in columns four and five.

Authority	% split	Base Budget 2024/25	Wokingham Salary Pressure	Investment Bid Income Pressure	Total Budget 2024/25
Bracknell Forest	39.25%	£ 1,233,603	£ 114,217	£ 40,000	£ 1,387,820
West Berkshire	60.75%	£ 1,909,327	£ 176,783	£ 58,000	£ 2,144,110
Wokingham	-	£ 515,990	-	-	£ 515,990
Total Budget 2024/25	100.00%	£ 3,658,920	£ 291,000	£ 98,000	£ 4,047,920

- 5.24 Based on these uplift adjustments the budget has increased by 5.6% (excluding pressure bids). Although the staff and budgets are hosted by West Berkshire Council it is important to note that these inflationary pressures would have been experienced by the individual partner Councils had the services been hosted individually.
- 5.25 At the Committee meeting on the 7th November 2019 the Committee approved a methodology for local service reduction should any partner authority wish to propose this. The methodology recognised the nature of the partnership and the need to maintain ‘agreed percentages’ and cover the costs of shared resource with respect to core service delivery costs.
- 5.26 The proposed fees and charges for 2024/25 are set out in Appendix A. The fees comprise both discretionary and statutory fees and charges. The discretionary fees are based on a cost recovery model with an hourly rate set at £68.25. The statutory fees are included for ease of reference and will be updated in line with any published amendments.

Statutory consultations for variations to taxi and private hire vehicles and private hire operator fees will be undertaken in accordance with Sections 53 and 70 of the Local Government (Miscellaneous Provisions) Act 1976.

6. Concluding Observations

- 6.1 It is a key responsibility for the Committee to recommend a revenue budget including a fees and charges structure. The Committee also has a responsibility to keep under review the budget and consider the outturn and any variance.
- 6.2 The Joint Management Board has considered the budget. Whilst it remains the view that the integrity of the PPP is best maintained by delivering any savings collectively as has happened in previous years the methodology for local service disinvestment has been agreed should any Council determine a lower contribution than that set out at paragraph 5.22.
- 6.3 It has been a consistent view of Joint Management Board and Committee that cost recovery forms the basis of all decisions relating to the setting of discretionary fees and any other charges or cost recovery levied or otherwise to deliver the service e.g. recovery of court costs.
- 6.4 The recommendations aim to meet the requirements of the IAA, the approved priorities plan and current indicated budget position of the partners.

7. Appendices

- 7.1 Appendix A – Draft 2024/25 Fees and Charges

8. Background Papers:

- 8.1 None

Subject to Call-In:

Yes: No:

The item is due to be referred to Council for final approval



Wards affected: All Wards

Officer details:

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

DRAFT PUBLIC PROTECTION PARTNERSHIP FEES AND CHARGES 2024/2025

The Public Protection Partnership (PPP) provides chargeable services on behalf of two authorities, Bracknell Forest Council and West Berkshire Council.

Fees effective from 1 April 2024

Please Note:

- All Statutory Fees and those linked to national schemes are based on fees published on 21 September 2023 and may be subject to change by Central Government or the management of the schemes.
- The Hourly rate is **£68.25ph** for 2024/25 (uplift based on CPI Index as at August 2023 of 6.7%), if there is a minimum number of hours or it is capped it is indicated in the text below.
- Class A Statutory Fees are marked with **Pale Gold** and Class B Discretionary Fees are headed **Blue**
- There are some additional fees which will be due when making an application, these are listed separately (if known) and with a note if varied amounts
- If you have any questions regarding our fees and charges please contact PPP Partnership Support Customer Care team using our [Make an enquiry form](#).

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LICENCES, REGISTRATIONS AND CONSENTS

Pre-Application Advice

We provide chargeable pre-application advice for the following licenses and consents:

License/Consents	2023/24 Fee	2024/25 Fee
Gambling Act	£64ph	£68.25
Licensed Premises Notifications	£64ph	£68.25
Licensing Act 2003	£64ph	£68.25
Scrap Metal	£64ph	£68.25
Sex Establishments	£64ph	£68.25
Skin Piercing & Dermal Treatments	£64ph	£68.25
Street Trading Consents	£64ph	£68.25

Animal Licences

Animal Licences – (Class A – Fee Discretionary)			
*The granting fee includes initial inspection and mid-term inspection totalling 4 hours (unless stated differently). Inspections required beyond this due to additional visits and aborted visits will be charged at an additional fee **Additional vets fee payable		2023/24 Fee	2024/25 Fee
NEW - Animal Boarding Establishment - combined (dogs and cats)	Application Fee	£192	£204.75
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£448 minimum	£477.75 minimum
RENEWAL - Animal Boarding Establishment - combined (dogs and cats)	Application Fee	£160	£171
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£416 minimum	£444 minimum
NEW - Animal Boarding Establishment - single species (dogs or cats))	Application Fee	£128	£136.50
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£384 minimum	£409.50 minimum
RENEWAL - Animal Boarding Establishment - single species (dogs or cats))	Application Fee	£96	£102
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£352 minimum	£375 minimum
NEW - Home boarder (midterm fee removed for 2024)	Application Fee	£128	£136.50
	Granting Fee	Minimum 2 hours at £128*	Minimum 4 hours at £273
	Total Fee (minimum)	£256 minimum	£409.50 minimum
RENEWAL - Home boarder (midterm fee removed for 2024)	Application Fee	£96	£102
	Granting Fee	Minimum 2 hours at £128*	Minimum 4 hours at £273*
	Total Fee (minimum)	£224 minimum	£375 minimum

NEW - Home Boarder - Franchisee arrangers licence (excludes inspection fee per host)	Application Fee	£128	£136.50
	Granting Fee	Per inspection at hourly rate	Per inspection at hourly rate
	Total Fee (minimum)	£128 + host inspection fee	£136.50 + host inspection fee
RENEWAL - Home Boarder - Franchisee arrangers licence (excludes inspection fee per host)	Application Fee	£96	£102
	Granting Fee	Per inspection at hourly rate	Per inspection at hourly rate
	Total Fee (minimum)	£96 + host inspection fee	£102 + host inspection fee
Assessment of hobby host as part of a franchisee licence	Host inspection fee	£128	£136.50
NEW - Dog Day Care	Application Fee	£192	£204.75
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£448 minimum	£477.75 minimum
RENEWAL - Dog Day Care	Application Fee	£160	£171
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£416 minimum	£444 minimum
NEW - Dog Breeding Establishment (**excluding vet fee)	Application Fee	£192	£204.75
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£448 minimum	£477.75 minimum
RENEWAL - Dog Breeding Establishment	Application Fee	£160	£171
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£416 minimum	£444 minimum
NEW - Dog Breeding Establishment (in domestic dwelling)(**excluding vet fee)	Application Fee	£128	£136.50
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£384 minimum**	£409.50 minimum
RENEWAL - Dog Breeding Establishment (in domestic dwelling)	Application Fee	£96	£102
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£352 minimum	£375 minimum
NEW - Pet Vending / Sale of pets	Application Fee	£128	£136.50
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£384 minimum	£409.50 minimum
RENEWAL - Pet Vending / Sale of pets	Application Fee	£96	£102
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£352 minimum	£375 minimum

NEW - Animal for Exhibition	Application Fee	£192	£204.75
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£448 minimum	£477.75 minimum
RENEWAL - Animal for Exhibition	Application Fee	£160	£171
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£416 minimum	£444 minimum
Riding Establishment - Inspections are carried out annually, regardless of the star rating or length of licence, by a qualified Veterinarian Officer. **Vets fees will be recharged separately.			
NEW - Main inspection fee, plus fee per horse (**excluding vets fee)	Application Fee	£128	£136.50
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£416 minimum**	£409.50 minimum**
RENEWAL - Main inspection fee, plus fee per horse (**excluding vets fee)	Application Fee	£96	£102
	Granting Fee	Minimum 4 hours at £256*	Minimum 4 hours at £273*
	Total Fee (minimum)	£352 minimum**	£375 minimum**
Fee per horse, for the first 10 horses		£16	£17
Fee per horse, for next 11-50 horses		£11	£12
Fee per horse, for every horse 51 & over		£9	£9.50
Other Fees			
Additional mid licence visit		£128	£136.50
Variation to the licence fee (inclusive of one visit)		£192	£204.75
Replacement licence fee (lost or stolen paperwork, change of name, etc.)		£32	£34
Re-evaluation of star rating (inclusive of one visit)		£128	£136.50
Transfer due to death of licensee	Admin cost	£32	£34

Wild Animals and Zoos

Wild Animals & Zoos	Duration	2023/24 Fee	2024/25 Fee
Dangerous Wild Animal Consent - New (** excluding vets fee)	2 years	£512	£546
Dangerous Wild Animal Consent – Renewal (** excluding vets fee)	2 years	£320	£341.25
Zoo Licences (new & renewals) Periodical inspections (** excluding Vets Fees)	Up to 6 years	£2240	£2388.75

Explosives Licences – Statutory

Description	Duration	All Council Areas
New licence for explosives below 250kg Net Explosive Content (NEC)	1 year	£113.00
	2 years	£147.00
	3 years	£181.00
	4 years	£215.00
	5 years	£248.00
Renewal of licence for explosives below 250kg Net Explosive Content (NEC)	1 year	£56.00
	2 years	£90.00
	3 years	£125.00
	4 years	£158.00
	5 years	£193.00
New licence for explosives above 250kg Net Explosive Content (NEC)	1 year	£193.00
	2 years	£253.00
	3 years	£317.00
	4 years	£390.00
	5 years	£441.00
Renewal of licence for explosives above 250kg Net Explosive Content (NEC)	1 year	£90.00
	2 years	£153.00
	3 years	£215.00
	4 years	£277.00
	5 years	£340.00
Varying the name of licensee or address of site		£38.00
Any other kind of variation		Cost Recovery
Transfer of licence		£38.00
Replacement Licence		£38.00
Full year registration for sale of fireworks (capped fee)		£500.00

Gambling Act 2005 – Statutory

Description	Type	All Council Areas
Casinos (regional)	New Application	£15,000
	Provisional Statement	£15,000
	Application with Provisional Statement	£8,000
	Variation	£7,500
	Transfer/Reinstatement	£6,500
	Annual Fee	£15,000

Casinos (large)	New Application	£10,000
	Provisional Statement	£10,000
	Application with Provisional Statement	£5,000
	Variation	£5,000
	Transfer/Reinstatement	£2,150
	Annual Fee	£10,000
Casinos (small)	New Application	£8,000
	Provisional Statement	£8,000
	Application with Provisional Statement	£3,000
	Variation	£4,000
	Transfer/Reinstatement	£1,800
	Annual Fee	£5,000
Bingo Clubs	New Application	£3,500
	Provisional Statement	£3,500
	Application with Provisional Statement	£1,200
	Variation	£1,750
	Transfer/Reinstatement	£1,200
	Annual Fee	£1,000
Betting Premises	New Application	£3,000
	Provisional Statement	£3,000
	Application with Provisional Statement	£1,200
	Variation	£1,500
	Transfer/Reinstatement	£1,200
	Annual Fee	£600
Tracks	New Application	£2,500
	Provisional Statement	£2,500
	Application with Provisional Statement	£950
	Variation	£1,250
	Transfer/Reinstatement	£950
	Annual Fee	£1,000
Family Entertainment Centres	New Application	£2,000
	Provisional Statement	£2,000
	Application with Provisional Statement	£950
	Variation	£1,000
	Transfer/Reinstatement	£950
	Annual Fee	£750
Adult Gaming Centres	New Application	£2,000
	Provisional Statement	£2,000
	Application with Provisional Statement	£1,200
	Variation	£1,000
	Transfer/Reinstatement	£1,200
	Annual Fee	£1,000
Lotteries & Amusements	New Application	£40
	Annual Fee	£20
All licences	Notification of change	£50
	Copy of licence	£25
Club gaming or machine permit	New Application	£200
	Existing holder	£100
	Renewal	£200
	Annual Fee	£50
	Variation	£100
	Copy of licence	£15

Club Gaming or Machine Permit (holds a club Premises Certificate under Licensing Act 2003)	New Application	£100
	Renewal	£100
Licensed Premises Notifications		All Council Areas
To make available up to 2 gaming machines on premises which hold on-premises alcohol licence	Notification of intention	£50
Gaming Machine Permit (more than 2 machines) on-premises which hold on premises alcohol licence	Application (existing holder)	£100
	New Application	£150
	Annual Fee	£50
	First Annual Fee (payable within 30 days of date permit takes effect)	£50
	Variation	£100
	Transfer	£25
	Change of name	£25
	Copy of permit	£15

Hackney Carriage and Private Hire Licences

Vehicle Licences		Bracknell Forest 2023/24 Fee	West Berkshire 2023/24 Fee	All Council Areas (where applicable) 2024/25 Fee
Hackney Carriage Vehicle – New		£288	£288*	£307*
Hackney Carriage Vehicle – Renewal		£256	£256*	£273*
Private Hire Vehicle – New		£288	£288	£307
Private Hire Vehicle – Renewal		£256	£256	£273
Home to school – New and renewal		£160	N/a	£171
Private Hire Vehicle with Dispensation - New		£288	£288	£307
Private Hire Vehicle with Dispensation - Renewal		£256	£256	£273
Temporary Vehicle Licence	Up to 3 months	£256	£256	£273
Driver Licences				
Driver – New	3 year Includes initial tests, safeguarding and disability trainings	£328	£328	£350
Driver – Renewal		£296	£296	£316
Home to school – New & Renewal	3 year Includes initial tests, safeguarding	£225	N/a	£240

	and disability trainings			
Conversion of driver licence to another type	1.5hrs (inc retaking tests)	£96	£96	£102
* It was agreed at the Executive meeting on the 22 September 2022 that West Berkshire Council would offer a fee based remittance scheme, subsidised by the Council and that it be introduced from 01 April 2023 for both electric (100%) and hybrid (50%) vehicles that met the agreed criteria.				

Private Hire Operators (PHO)

Private Hire Operator	Number of Vehicles	2023/24 Fee	2024/25 Fee
NEW Per vehicle calculation of 3.5 hours (at £68.25 hourly rate) plus an hour per year (years 2-5) for first vehicle, plus 15 minutes per additional vehicle per years (years 1-5) up to a maximum of 20 vehicles	1	£480	£512
	2	£560	£597
	3	£640	£682
	4	£720	£768
	5	£800	£853
	6	£880	£938
	7	£960	£1024
	8	£1040	£1109
	9	£1120	£1194
	10	£1200	£1280
	11	£1280	£1365
	12	£1360	£1450
	13	£1440	£1536
	14	£1520	£1621
	15	£1600	£1706
	16	£1680	£1792
	17	£1760	£1877
	18	£1840	£1962
	19	£1920	£2048
	20	£2000	£2133
20+	£2000	£2133	
Private Hire Operator	Number of Vehicles	2023/24 Fee	2024/25 Fee
RENEWAL Per vehicle calculation of 1.5 hours (at £68.25 hourly rate) plus an hour per year (years 2-5) for first vehicle, plus 15 minutes per additional vehicle per years (years 1-5) up to a maximum of 20 vehicles	1	£352	£375
	2	£432	£461
	3	£512	£546
	4	£592	£631
	5	£672	£717
	6	£752	£802
	7	£832	£887
	8	£912	£973
	9	£992	£1058
	10	£1072	£1143
	11	£1152	£1229
	12	£1232	£1314
	13	£1312	£1399
	14	£1392	£1484
	15	£1472	£1570
	16	£1552	£1655

	17	£1632	£1740
	18	£1712	£1826
	19	£1792	£1911
	20	£1872	£1996
	20+	£1872	£1996

Other Private Hire & Hackney Carriage Charges

Transfer of vehicle to new owner		£64	£68.25
Change of vehicle		£80	£85
Replacement Licence		£32	£34
Replacement Badge		£32 + Badge Costs (£5)	£34 + Badge Costs (£5)
Replacement Vehicle Licence Plate		£32 + Plate Costs (£26)	£34 + Plate Costs (£26)
Knowledge Test		£80	£85
Missed Appointment		£32	£34
Disclosure and Barring Service Check (DBS)		£70	At cost
Advertising on a Hackney carriage - New	Bracknell Only	£64	£68.25
Advertising on a Hackney Carriage - Renewal	Bracknell Only	£32	£34
Change of address (PH & HC)		£11.50	£17
Backing Plate		£26 at cost	At cost
Medical Exemption		£32	£34
Refund Processing Fee		£32	£34
Change of vehicle registration	Including	£32 + sticker and licence costs (£31)	£34 + sticker and licence costs (£31)
Age of vehicle Inspection – initial & renewal	Bracknell Only	£64	£68.25
Pre-application advice, hourly rate	Min 1 hour	£64	£68.25
First aid Training	Bracknell Only	Will be removed if revisions to policy adopted	

Hairdresser Registration (Bracknell Forest Only)

Description	2023/24 Fee All Council Areas (where applicable)	2024/25 Fee All Council Areas (where applicable)
Hairdresser/barber registration	£32	£34

Licensing Act 2003 – Statutory

Premises Licence – “one off” fees set by statute based upon rateable value (RV) of premises (Class B – Statutory Fee)	PPP Areas
Band A – RV up to 4,300	£100
Band B – RV 4,300 to 33,000	£190
Band C – RV 33,001 to 87,000	£315
Band D – RV 87,001 to 125,000	£450
Band E – RV 125,001 and above	£635
Pre-application advice, hourly rate	£68.25
Premises Licence – Annual Fee (Class B – Statutory Fee)	
Band A	£70
Band B	£180
Band C	£295
Band D	£320
Band E	£350
Personal Licence - (Class B – Statutory Fee)	£37
Temporary Event Notices (TENs) - (Class B – Statutory Fee)	£21
Application for copy licence	£10.50
Application to vary DPS/transfer licence/interim notice	£23
Application for making a provisional statement	£315
Minor variation	£89
Application to disapply mandatory DPS condition	£23
Pre-application work, hourly rate	£68.25

Petroleum Licences – Statutory

Petroleum Licences	All Council Areas
Not exceeding 2,500 litres	£46
Not exceeding 50,000 litres	£62
Exceeding 50,000 litres	£131

Scrap Metal

Description		2023/24 Fee	2023/25 Fee
Scrap Metal site –New	3 Years	£512	£546
Scrap Metal site - Renewal	3 Years	£480	£512
Scrap Metal mobile collector - new	3 Years	£256	£273
Scrap Metal mobile collector - renewal	3 Years	£224	£239
Scrap Metal - Variation of Licence		£256	£273
Scrap Metal - change of site manager		£64	£68.25
Scrap Metal - copy of licence		£16	£17
Scrap Metal - Change of Name		£32	£34

Sex Establishments – Statutory

Description	Type	All Council Areas
Sex Establishments - (Class A – Fee Discretionary)	Cinema	min £3,100 to max £5,150
	Shop	min £3,100 to max £5,150
	Entertainment Venue	min £3,100 to max £5,150

Skin Piercing & Dermal Treatments

Description	Type	2023/24 Fee	2024/25 Fee
Skin piercing Registrations (one off registration) - (Class A – Fee Discretionary)	Individual (4hrs)	£256	£273
	Premises (5hrs)	£320	£341
	Joint application (7hrs)	£448	£478
Pre-application work, hourly rate	Min. 1 hour	£64	£68.25

Street Trading Consents

Description	Type	Bracknell 2023/24 Fee	Bracknell Forest 2024/25 Fee	West Berkshire 2023/24 Fee	West Berkshire 2024/25 Fee
	Daily	£64	£68.25	£64	£68.25
Street Trading Consents - (Class A – Fee Discretionary)	1 Week	£156	£171	£156	£171
	Monthly Rate	£262	£273	£262	£273
	3 months	£699	£751	£699	£751
	6 months	£875	£938	£875	£938
	Annual Fee	£1487	£1587	£1487	£1587
	6 months max. 2 trading days a week incl. Fri, Sat & Sun	£699	£751	N/A	N/A
	6 months max. 2 trading days a week Mon-Thurs only	£525	£563	N/A	N/A
	Ice cream van (per van) 6 month	£781	£833	£875	£933
	Ice cream van (per van) 1 month	£202	£216	£262	£279
Variation fee		£96	£102	£96	£102
Refund for Street Traders	In the event that following consultation the application is refused or deemed withdrawn by officers, a sum of 50% of the application fee is payable as a refund. If the application is refused by a Panel, no refund of the application fee is payable.				
Pre-application work, hourly rate	Min. 1 hour	£64	£68.25	£64	£68.25

ENVIRONMENTAL PROTECTION

Abandoned vehicles – Statutory

Description		Bracknell Forrest Only
Removal (prescribed fee)	Less than 3.5 tonnes	£150
Daily Storage (prescribed fee)	Less than 3.5 tonnes	£20
Enforcement Disposal costs (prescribed fee)	Less than 3.5 tonnes	£75
Fixed Penalty Notice	Reduced to £120.00 if paid within 7 days	£200
Enforcement invoice costs		£77

Anti-Social Behaviour Act

Description		2023/24 Fee	2024/25 Fee
Anti-Social Behaviour Act	High Hedges Fee (Class A – Fee Discretionary)	£1310	£1399

Dog Warden Services

Description	2023/24 Fee	2024/25 Fee
Stray Dogs – not taken to kennel	£80	£85
Stray Dogs – taken to kennel	£80 plus Cost recovery and Vets fees separate.	£85 plus Cost recovery and Vets fees separate
Kennels cost	Recharge based on cost	Recharge based on cost
Dog fouling fixed penalty charge	£75	£75
Miscellaneous stray dog activities e.g. taxi, relocating, microchipping	Cost recovery charged at £64ph	Cost recovery charged at £68.25ph

Environmental Permitting Regulations 2016 – Statutory

Scheduled Processes – (Class B – statutory Fee)		All Council Areas
Standard Process		£1,650
Additional fee for operating without a permit		£1,188
Service Stations (PVR 1 & PVR II combined)		£257
Service Station (PVR 1)		£155
Dry Cleaners		£155
Vehicle Refinishers		£362
Mobile Screening & Crushing Plant		£1,650
Mobile Screening & Crushing Plant for the 3 rd to 7 th applications		£985
Mobile Screening & Crushing Plant for the 8 th and subsequent applications		£498
Substantial changes		
Standard Process		£1,050
Standard process where substantial change results in a new PPC activity		£1,650
Reduced Activities		£102
Annual Subsistence Charge (Statutory)		

Standard Process	Low	£772
	Medium	£1,161
	High	£1,747
Service stations PVR II	Low	£113
	Medium	£226
	High	£341
VR and other reduced fees	Low	£228
	Medium	£365
	High	£548
Dry cleaners/PVR1	Low	£79
	Medium	£158
	High	£237
Mobile Screening & Crushing Plant	Low	£626
	Medium	£1,034
	High	£1,506
Mobile Screening & Crushing Plant for 2 nd permit	Low	£646
	Medium	£1,034
	High	£1,506
Mobile Screening & Crushing Plant for 3 rd to 7 th permit	Low	£385
	Medium	£617
	High	£924
Mobile Screening & Crushing Plant for the 8 th and subsequent permits	Low	£198
	Medium	£316
	High	£473
Late payment charge	If invoice issued & not paid within 8 weeks	£52
Transfer and Surrender		
Transfer		£169
Partial Transfer		£497
Surrender		£0
Transfer Reduced fees		£0
Partial Transfer Reduced Fees		£47

Private Sector Housing

Description	2023/24 Fee	2024/25 Fee
Inspection of Housing Premises for Immigration purposes (Class A – Fee Discretionary)	£435	£464
Enforcement Notices served under Housing Act 2004	Hrly Rate	Hrly Rate
HMO Licence NEW	£1280	£1365
HMO Licence RENEWAL	£865	£922
Caravan Site Licences		
Site licence new (plus additional fee per pitch)	£480	£512
New licence additional fee per pitch	£17	£18
Transfer of licence	£192	£205
Alteration of conditions	Hrly Rate	Hrly Rate
Annual inspection fee – per pitch	£15	£16
Enforcement action -per hour	Hrly Rate	Hrly Rate
Deposit, vary or deleting site rules	£128	£136.50
Mobile Homes Regulations 2020		
Application Fee – Fit and Proper Test	£128	£136.50

(any application taking more than two hours to process will be charged at an additional hourly rate of £68.25/ph or part thereof)		
Annual Check Fee – Fit and Proper Test	Hrly Rate	Hrly Rate
Where the authority has to assist with appointing a site manager the costs will be specified in the agreement between the parties		

Private Water Supplies

Description		2023/24 Fee	2024/25 Fee
Risk assessment (for each assessment)	Every 5 years. Min. charge 1 hour, simple risk assessment and report typically 5 hours	£64 hourly rate	£68.25
Sampling visit (for each sampling visit) *	Charge for a visit, taking a sample and delivery to the laboratory. Typically 2.5 hours	£64 hourly rate	£68.25
Investigation	Carried out in the event of a test failure, can be substituted by the risk assessment - this does not include any required analysis costs.	£128	£136.50
Regulation 9 Supply Analysis of Group A Parameters		Hourly Rate + Laboratory Costs	Laboratory Costs **
Regulation 9 Supply Analysis of Group B Parameters		Hourly Rate + Laboratory Costs	Laboratory Costs **
Regulation 10 Supply Parameters		Hourly Rate + Laboratory Costs	Laboratory Costs **
Analysis of Single Dwelling Supplies (upon request)		Hourly Rate + Laboratory Costs	Laboratory Costs **

* A local authority should not charge for a sample that is taken and analysed solely to confirm or clarify the results of a previous sample. A local authority can charge for a sample visit to verify the effectiveness of improvements, e.g. following completion of actions specified in a Notice.

** Laboratory fees set annually

Other Fees

	Hourly rate applies minimum of 2 hours	2023/24 Fee	2024/25 Fee
Environmental Information Request - Individual, Non-Commercial	Hourly rate applies minimum of 2 hours	£128 minimum	£136.50 minimum
Environmental Information Request - Commercial and Government	Hourly rate applies minimum of 2 hours	£128 minimum	£136.50 minimum
Civil Actions (Class A – Fee Discretionary)		£128 minimum	£136.50 minimum

Safety Certification and administration	Hourly rate applies minimum of 2 hours	£128 minimum	£136.50 minimum
Pre-Application Advice, hourly charge		£64	£68.25

TRADING STANDARDS

Buy with confidence

Description	Employee numbers	2023/24 Fee	2024/25 Fee
Application Fee (set nationally by Buy with Confidence scheme)	1-5 employees	£136	£145
	6-20 employees	£182	£200
	21-49 employees	£226	£250
	50+ employees	POA	POA
Annual fee (set nationally by Buy with Confidence scheme)	1-5 employees	£272	£270
	6-20 employees	£408	£405
	21-49 employees	£545	£540
	50+ employees	POA	POA
Members before 2017/18 Annual Fee (Bracknell Forest legacy members only)	1-5 employees	£136	£136
	6-20 employees	£206	£206
	21-49 employees	£274	£274

* West Berkshire & Wokingham schemes administered by Hampshire County Council

Primary Authority

Description	2023/24 Fee	2024/25 Fee
Primary Authority Work hourly chargeable rate	£64 Hourly Rate	£68.25 Hourly Rate
Annual charge - previous year usage 10 hours or less	£576	£614.25
Annual charge - previous year usage 20 hours	£1,158	£1228.50
Anything likely to be in excess of 20 hours	Individually assessed	Individually assessed

Support with Confidence

Description	Employee numbers	2023/24 Fee	2024/25 Fee
Application fee	1-5 employees	£64	£68.25
	6-20 employees	£130	£136.50
	21+ employees	£327	£349

Weights and Measures

Description		2023/24 Fee	2024/25 Fee
Weights and Measures Fees	Includes the cost of maintaining calibration of equipment annually (Based on ACTSO guidance)	£64 per hr	£68.25 per hr

Other Fees

Description		2023/24 Fee	2024/25 Fee
Food export certificates	Full cost recovery based on hourly rate	£64 minimum	£68.25 minimum
Food Hygiene Rating Scheme rescore	2 hours	£128	£136.50
General Business Advice (Non-Primary Authority)	Hourly rate (first 30 minutes free)	£64	£68.25
Resident Request for Advice	Hourly rate	£64	£68.25

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