



THE LONDON BOROUGH  
www.bromley.gov.uk

BROMLEY CIVIC CENTRE, STOCKWELL CLOSE, BROMLEY BRI 3UH

TELEPHONE: 020 8464 3333

CONTACT: Steve Wood  
[stephen.wood@bromley.gov.uk](mailto:stephen.wood@bromley.gov.uk)

DIRECT LINE: 020 8313 4316

FAX: 020 8290 0608

DATE: 2 September 2019

To: Members of the  
**PUBLIC PROTECTION AND ENFORCEMENT POLICY DEVELOPMENT & SCRUTINY COMMITTEE**

Councillor David Cartwright QFSM (Chairman)  
Councillor Chris Pierce (Vice-Chairman)  
Councillors Kathy Bance MBE, Julian Benington, Kim Botting FRSA, Mike Botting, Alexa Michael, Suraj Sharma and Harry Stranger

Non-Voting Co-opted Members –

Sharon Baldwin, Chairman - Safer Neighbourhood Board  
Dr Robert Hadley, Bromley Federation of Residents Associations  
Alf Kennedy, Bromley Neighbourhood Watch  
Cameron Ward, Bromley Youth Council  
Emily Warnham, Bromley Youth Council

A meeting of the Public Protection and Enforcement Policy Development & Scrutiny Committee will be held at Committee Room 1 - Bromley Civic Centre on **TUESDAY 10 SEPTEMBER 2019 AT 7.00 PM**

MARK BOWEN  
Director of Corporate Services

*Copies of the documents referred to below can be obtained from*  
<http://cds.bromley.gov.uk/>

## **PART 1 AGENDA**

**Note for Members:** Members are reminded that Officer contact details are shown on each report and Members are welcome to raise questions in advance of the meeting.

### **STANDARD ITEMS**

- 1 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**
- 2 DECLARATIONS OF INTEREST**
- 3 QUESTIONS FROM COUNCILLORS AND MEMBERS OF THE PUBLIC TO THE CHAIRMAN**

In accordance with the Council's Constitution, questions that are not specific to reports on the agenda must have been received in writing 10 working days before the date of

the meeting.

Questions specifically concerning reports on the agenda should be received within two working days of the publication date of the agenda. Please ensure that questions specifically regarding reports on the agenda are received by the Democratic Services Team by **5 pm on 4<sup>th</sup> September 2019**.

**4 MINUTES OF THE PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE--26TH JUNE 2019 (Pages 1 - 14)**

**5 MATTERS OUTSTANDING (Pages 15 - 18)**

**6 POLICE UPDATE**

**HOLDING THE PORTFOLIO HOLDER TO ACCOUNT**

**7 QUESTIONS TO THE PORTFOLIO HOLDER FROM MEMBERS OF THE PUBLIC AND COUNCILLORS**

In accordance with the Council's Constitution, questions that are not specific to reports on the agenda must have been received in writing 10 working days before the date of the meeting.

Questions specifically concerning reports on the agenda should be received within two working days of the publication date of the agenda. Please ensure that questions specifically regarding reports on the agenda are received by the Democratic Services Team by **5 pm on 4<sup>th</sup> September 2019**.

**8 MOPAC UPDATE**

**9 PORTFOLIO HOLDER UPDATE**

**10 PRE-DECISION SCRUTINY OF PORTFOLIO HOLDER REPORTS**

Portfolio Holder decisions for pre-decision scrutiny.

**a CAPITAL PROGRAMME MONITORING--2018/2019 OUTTURN (Pages 19 - 22)**

**b DRAFT FOOD SAFETY PLAN--2019-2020 (Pages 23 - 54)**

**POLICY DEVELOPMENT AND OTHER ITEMS**

**11 RISK REGISTER UPDATE REPORT (Pages 55 - 68)**

**12 CONTRACTS REGISTER REPORT AND PART 1 DATABASE EXTRACT (Pages 69 - 78)**

**13 PP&E PERFORMANCE OVERVIEW (Pages 79 - 80)**

**14 WORK PROGRAMME (Pages 81 - 86)**

**PART 2 AGENDA**

**15 LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION)(VARIATION) ORDER 2006, AND THE FREEDOM OF INFORMATION ACT 2000**

The Chairman to move that the Press and Public be excluded during consideration of the items listed below as it is likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the press or public were present there would be disclosure to them of exempt information.

<b><u>Items of Business</u></b>	<b><u>Schedule 12A Description</u></b>
<b>16 PART 2 MINUTES--26TH JUNE 2019 (Pages 87 - 90)</b>	Information relating to the financial or business affairs of any particular person (including the authority holding that information)
<b>17 PART 2 CONTRACTS DATABASE EXTRACT (Pages 91 - 92)</b>	Information relating to the financial or business affairs of any particular person (including the authority holding that information)
<b>18 PART 2 REPORTS FOR COMMITTEE SCRUTINY BEFORE GOING TO THE EXECUTIVE FOR DECISION</b>	
<b>19 AWARD OF CONTRACT FOR THE MORTUARY SERVICE (Pages 93 - 100)</b>	Information relating to the financial or business affairs of any particular person (including the authority holding that information)

This page is left intentionally blank

## **PUBLIC PROTECTION AND ENFORCEMENT POLICY DEVELOPMENT & SCRUTINY COMMITTEE**

Minutes of the meeting held at 7.00 pm on 26 June 2019

### **Present:**

Councillor David Cartwright QFSM (Chairman)  
Councillor Chris Pierce (Vice-Chairman)  
Councillors Kathy Bance MBE, Julian Benington,  
Kim Botting FRSA, Mike Botting, Alexa Michael,  
Suraj Sharma and Harry Stranger

Sharon Baldwin, Dr Robert Hadley and Cameron Ward

### **Also Present:**

Rob Vale, Toby Smith, John Stephenson, Chloe Wenbourne, Councillor Kate Lymer, Chief Inspector Craig Knight and Mark Atkinson

## **STANDARD ITEMS**

### **1 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**

Apologies were received from Alf Kennedy (Neighbourhood Watch) and from Emily Warnham (Bromley Youth Service).

### **2 DECLARATIONS OF INTEREST**

There were no declarations of interest.

### **3 APPOINTMENT OF CO-OPTED MEMBERS**

#### **Report CSD19095**

Members noted the report relating to the appointment of Co-opted Members.

#### **RESOLVED that:**

#### **1) The following non-voting Co-opted Members be re-appointed:**

- **Sharon Baldwin (Safer Neighbourhood Board)**
- **Alf Kennedy (Neighbourhood Watch)**
- **Dr Robert Hadley (Bromley Federation of Residents Associations)**
- **Cameron Ward (Bromley Youth Council)**

**2) Emily Warnham (Bromley Youth Council) be appointed as a new non-voting Co-opted Member**

**4 QUESTIONS TO THE CHAIRMAN OR TO THE COMMITTEE**

There were no questions received from Councillors or members of the public.

**5 MINUTES OF THE PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE MEETING HELD ON 28th MARCH 2019**

Members considered the minutes of the meeting of the Public Protection and Enforcement PDS Committee that sat on 28<sup>th</sup> March 2019.

**RESOLVED that the minutes of the meeting (excluding exempt information) held on 28<sup>th</sup> March 2019 be agreed and signed as a correct record.**

**6 MATTERS OUTSTANDING**

**Report CSD 19086**

Members noted the Matters Outstanding report.

The Head of Trading Standards and Community Safety updated Members concerning the Knife and Serious Violence Action Plan. This was a 'live' document and governance lay with the Safer Bromley Partnership. The latest version of the document had been sent to London Councils and MOPAC for feedback. It would then be updated by the newly appointed LBB Gangs and Serious Youth Violence Officer. A small working group (appointed by the Safer Bromley Partnership) would ensure that the Action Plan was carried out.

As the document was 'protected' because it contained sensitive information, it had not been incorporated into the meeting agenda or disseminated to the public. The Chairman expressed disappointment that the Committee was not allowed to see the document, even on a confidential Part 2 basis. He felt that it was important that the Committee be kept up to date and was aware of best practice.

The Chairman asked if there was anything that the Committee could do to help with respect to progressing the feedback from MOPAC. The Head of Trading Standards and Community Safety said that he would continue to push and seek a response. The Chairman requested that the Head of Trading Standards and Community Safety report back in one month to provide an update concerning any progress made regarding feedback from MOPAC and London Councils on Bromley's Knife and Serious Violence Action Plan.

**RESOLVED that the Matters Outstanding report be noted and that the Head of Trading Standards and Community Safety report back to the**

**Committee in a month with an update on progress made with the development of the Knife and Serious Violence Action Plan.**

**7 POLICE UPDATE**

Chief Inspector Craig Knight attended to provide the police update and commenced by highlighting the main points of the 'Bromley ASB and Crime Performance & Analysis' document that had been tabled at the meeting, and disseminated previously.

There had been an uplift in stop and search across the MET Police. Bromley was approximately mid-table in terms of its stop and search volumes across London. The legislation primarily relied upon in this regard was section 23 of the Misuse of Drugs Act. It was often the case that if a stop and search for lower level drugs was undertaken, this could then lead to the discovery of harder drugs and weapons. It was hoped that in the future, the current rate of arrests from stop and search would increase, as officers became more familiar with the process. The current rate of arrest from stop and search was in the region of 10%--12% which was better than the London average.

A discussion took place regarding the use of robust powers under 'Section 60'. Section 60 of the Criminal Justice and Public Order Act 1994, allowed a police officer to stop and search a person 'without suspicion'.

Section 60 stop and searches could take place in an area which had been authorised by a senior police officer on the basis of their reasonable belief that violence had, or was about to occur, and where it was expedient to prevent it; or search people for a weapon if one was involved in an incident. It was set for a limited time (normally less than 12 hours) and allowed police officers to stop and search people without reasonable grounds. Section 60 was normally applied to a defined geographical area, but it had occasionally been used borough wide.

A Member asked if there had been a rise in complaints against the police because of the increased use of stop and search. The answer to this was 'no' and part of the reason for this was the use of body worn video cameras.

A Member asked that her appreciation to be recorded for the excellent work undertaken by police officers in Orpington, but at the same time expressed shock at the current levels of crime there. She asked how often the allocation of police officers was reviewed. The Chief Inspector replied that this was looked at weekly by inspectors and cluster sergeants. On a monthly basis, the allocation of police officers and resources was monitored by the TTCG (Tactical Tasking and Co-ordination Group); this was a monthly meeting to discuss resource allocation and crime priorities and also acted as an internal police performance meeting. Additionally, Chief Inspector Knight (along with Superintendent Colin Carswell) had to answer to the BCU (Borough Command Unit) Commander at a meeting of SO6.

The Chief Inspector assured the Committee that he was fully sighted regarding ASB and burglary in Orpington. Members were informed that an anti-burglary operation in Orpington had commenced two days previously. This was 'Operation Starfish' and was being conducted jointly with Kent Police. In fact, three arrests had been made on the morning of the meeting, and the operation was proving very successful.

The data regarding personal robbery in Bromley had remained static over the last two months. The data showing thefts from motor vehicles was also static, but the Chief Inspector commented that this was still too high. The figures for non-residential burglary (which included shoplifting) had risen. This was compounded by the fact that some businesses could not afford security arrangements. The statistics for 'Violence with Injury' had fluctuated over the rolling 12 months, but averaged 179 incidents per month; the May 2019 figure was 201.

Members were briefed that some licensed premises had been closed for not complying with the terms of their licenses. The trend for criminal damage was downward and there was not a large number of harassment incidents.

The Chief Inspector commented that the volume of hate crimes in Bromley was relatively low; there had been a spike recorded in May 2019, but the reason for this was not known.

The Committee was briefed on the rate of sanctioned detections over the last 12 weeks. This stood at 7% which was approximately the MET average. The good news was that the murder detection rate stood at approximately 80%.

A Member queried how many CID officers there were in Bromley. The Chief Inspector was not aware of the figure on the night, but promised to report back with the information. It was the case that Bromley Police were short of detectives and detective constables and that there was no longer a dedicated burglary squad. A Member expressed the view that the direct entry mechanism for detectives was not appropriate. The Chief Inspector responded that improvement in recruitment was required across the MET and that a variety of different recruitment routes were being considered.

A Co-opted Member queried if recruitment work was undertaken in schools. The answer to this was yes, and the work was undertaken by Police Schools Officers. The Chief Inspector mentioned that there was currently a drive to professionalise the police service. This would be done by providing professionally recognised qualifications from the Royal Institute of British Policing. A Member expressed concern that police officers would now be required to obtain a degree or similar professional qualification. She was concerned that the desire to obtain professional qualifications could replace the requirement for common sense.

Members were informed that recruitment to the MET was now being opened up to people living in the Home Counties. Youth engagement policies were in the pipeline.

Victim Satisfaction had fallen. It was thought that this was due to changes in the way that victims were being updated about ongoing investigations. This was an area that the police needed to improve on. Bromley police were doing better in the Public Attitude Survey, and a new Bromley Facebook Forum was being developed. This concept had taken off well in Sutton, where 2700 had been routinely engaged.

The Vice Chairman commented that not many people were aware of how to contact ward officers and he asked if the contact details could be found on the MET website. The Chairman confirmed that this was the case, but they were still hard to get hold of.

The Chairman asked for an explanation of the police's strategy for reducing serious crime, especially in the identified crime hotspots in the north of the borough. Chief Inspector Knight responded that the police had identified 9 high priority crime areas where there had been much police activity. The aim of the police was to identify and analyse crime hotspots and prioritise risks. The police would subsequently utilise their assets based on risk. District ward assets would be focused on areas based on risk, because drug dealing and violence were taking place across all wards and across boundaries. Mr Knight was confident that crime would now fall in the current 3 priority ward areas.

Sergeant Paul Brewer attended to provide the update relating to the day to day work of Neighbourhood Ward Officers. He said that the role of DWOs was to detect and tackle crime in crime hotspots. He expected his officers to possess a good working knowledge of the wards that they operated in, along with some knowledge of the neighbouring wards as well. They had to have a clear plan of what they were looking to achieve. They would be expected to know the suspects and vulnerable people in their wards. The DWOs would be supported by PCSOs who would be expected to focus on community engagement and social media interaction.

Sergeant Brewer discussed the use of stop and search powers by ward officers, which could be used to disrupt gang violence and other crime. He wanted to see knife carriers brought to justice; seized weapons were put on Twitter. He highlighted the need for pro-active police operations, and mentioned the joined up work that had been undertaken with BTP at train stations.

Mr Brewer stated that he expected his officers to show initiative, and to own and act upon intelligence themselves. Whenever possible, a search warrant should be obtained so that searches could be undertaken for drugs, weapons and dangerous dogs. He referred to operations that had been undertaken in Penge with wider BCU support, and the fact that when warrants were actioned they would be noted on Twitter feeds, as this instilled fear into criminals and assurance to the general public.

A Member asked Mr Brewer if the police were provided with information relating to large community events.

This was because a large community event had taken place recently and there was no police presence. Chief Inspector Knight responded that in the London South BCU there were approximately 6500 community events each year, and the police did not have the resources to send officers to every event, unless there was specific intelligence available to suggest that a police presence was required. The police would not normally consider providing a presence at an event unless the expected turn out for the event exceeded 30,000 people.

A Member enquired if motor vehicles were provided for DWOs. The answer was that there were currently 4 vehicles available which could be booked out in advance as required. Mr Knight encouraged his officers to walk and use public transport to provide assurances to the public. A bid had been submitted recently for more vehicles that could be used in plain clothes operations.

The Chairman felt that there was a problem with the reporting of ASB crime, although he did feel that the 101 service had improved slightly. He would welcome the reformation of the Police ASB Team if that was feasible.

It was noted that the next police update for the September meeting would focus on CID.

## **HOLDING THE PORTFOLIO HOLDER TO ACCOUNT**

### **8 QUESTIONS TO THE PORTFOLIO HOLDER FROM MEMBERS OF THE PUBLIC AND COUNCILLORS ATTENDING THE MEETING**

There were no questions from Councillors or Members of the Public.

#### **a PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO PLAN**

#### **Report ES19040**

The update regarding the Portfolio Holder Plan was provided jointly by the Head of Performance Management (ECS) and by the Portfolio Holder.

Members noted page six of the report that outlined in table form the various areas of enforcement where performance was being monitored. It was noted that in some cases, new units of measurement and new indicators had been employed.

It was mentioned that with respect to fly-tipping hotspots, it would be helpful in future if information could be supplied regarding the location of the hotspots and the targeted areas.

The Committee was briefed that LBB would fulfill its responsibilities under the Prevent duty and would review and publish the Safer Bromley Strategy. A strategic lead had now been appointed to lead on gang and youth violence

and would be leading on reviewing the findings of the Home Office Locality Review into gang violence in Bromley. GAP analysis would be employed and LBB would look to utilise the help of third sector providers where appropriate. One of the roles of the strategic lead would be to identify where potential gaps in provision lay, so that the gaps could be filled. The post was currently funded for one year only.

A Member expressed the view that LBBs CCTV provision was inadequate and asked if new CCTV cameras could be bought. The Chairman said that it had been agreed previously that new CCTV cameras could be acquired for safety reasons. These had been ordered. It was clarified that these particular cameras would be used for parking enforcement only.

A detailed discussion followed concerning the use and provision of CCTV cameras and issues around surveillance. A Member said that because a camera had been moved from a location in Penge, the area had subsequently returned to becoming a crime hotspot. The Head of Trading Standards and Community Safety stated that cameras could be moved and relocated. He also said that the policy surrounding CCTV needed to be reviewed. CCTV cameras could be taken down and redeployed to crime hotspots, as long as the requirements of the Surveillance Commissioner were met. This was normally done in response to a request from the police, who would have to supply the required crime data to meet the surveillance requirements.

A Member asked why LBB was stuck with a small number of cameras. The Portfolio Holder explained that this was due to a lack of money and the fact that the requirement was non-statutory. The Member asked if there was any money available from other budgets. It was important to deal with rising crime and the public was upset. She suggested that the provision of more CCTV cameras should be regarded as an investment.

The Committee was appraised concerning the cost of a new CCTV camera:

- £7k for the camera
- £1200.00 per annum for the sim card
- Whatever the provision of a new pole would cost
- Total cost for a new CCTV camera could rise to £20k

The Head of Trading Standards and Community Safety said that ward panels should be made more aware of the costs involved, and that he was happy to talk to community groups about this. It was clear that the use of CCTV was instrumental in making arrests, but the fact remained that there was a limited budget available to purchase and maintain cameras.

Members were briefed on actions that would be taken to prevent the financial abuse of the vulnerable. It was noted that the existing partnership and training/education work with banks would continue.

The Committee was appraised concerning the enforcement work that would be undertaken to support and regulate businesses in Bromley.

The Chairman drew attention to section 3.2 of the report which referenced '*insignificant*' risk businesses. The Chairman was not comfortable with this term, and asked that it be replaced with the word '*low*' for future reports.

It was noted that section 4.4 of the report referred to aviation noise, but there was nothing noted specifically regarding general noise nuisance. Assurance was provided that action would also be taken with respect to general noise nuisance. The matter of parking enforcement was mentioned, and the Head of Performance Management (ECS) said that efforts were being made to get people out of their cars. A Member responded that people would always need cars and parking spaces.

A Member highlighted that that there was nothing in the Plan that related to enforcement action being taken with respect to nuisance in parks and open spaces, and there did not appear to be anything regarding this incorporated into the new parks contract.

**RESOLVED that**

**1) The Portfolio Holder for Public Protection and Enforcement endorses the outcomes, aims, and performance measures set out in the draft 2019 Public Protection and Enforcement Portfolio Plan.**

**b BUDGET MONITORING--2019-2020**

**Report FSD19055**

Members noted the Budget Monitoring report for 2019/2020.

Members of the Committee agreed that the Portfolio Holder should endorse the budget projection.

**RESOLVED that the Portfolio Holder for Public Protection and Enforcement endorse the latest 2019/2020 budget projection for the Public Projection and Enforcement Portfolio.**

**c PPE PROVISIONAL OUTTURN-2018-2019**

**Report FSD19054**

The Committee noted the Provisional Outturn report and agreed that the Portfolio Holder should endorse the recommendations of the report.

**RESOLVED that**

**1) The Portfolio Holder endorses the 2018/2019 provisional outturn position for the Public Protection and Enforcement Portfolio**

- 2) **The Portfolio Holder approves the drawdown of the carry forward sums from 2018/2019, held in Central Contingency, totalling £163k (net of grant income).**

## **9 LETTING AGENTS ENFORCEMENT REPORT**

### **Report ES19039**

Members noted the Letting Agents Enforcement report that was written and presented by the Head of Trading Standards and Community Safety. This follow up report had been presented to the PDS Committee at the request of the Executive.

Visits had been undertaken by a project officer to ensure that letting agents within the borough were compliant with legislation which required that letting agents correctly displayed fees and protected clients' money properly. It was also required that letting agents were members of an appropriate redress scheme.

Members were appraised that as a result of the project, 25 businesses had been brought into compliance. The situation had therefore now improved, businesses were complying and the public were being properly informed. Members were informed that no additional costs were anticipated going forward. There would simply be a requirement to investigate complaints.

Members were advised that the project had not been funded by monies that had been recovered under the Proceeds of Crime Act. The money had been found from underspends elsewhere in the service. This meant that monies recovered under the Proceeds of Crime Act (£48.1k) could be carried forward.

**RESOLVED that the Public Protection and Enforcement PDS Committee note the report.**

## **10 PURPLE FLAG UPDATE REPORT**

### **Report DRR19/034**

Members noted the report that provided an update on the Purple Flag accreditation in Beckenham Town Centre, and that the report was also being presented to the Renewal, Recreation and Housing PDS Committee on 2<sup>nd</sup> July. Members supported the recommendations of the report.

**RESOLVED that**

- 1) **Members note the update on progress to date of the Purple Flag accreditation for Beckenham Town Centre**
- 2) **Members support further applications to renew the Purple Flag accreditation.**

## **11 PLANNING ENFORCEMENT PROGRESS AND MONITORING REPORT 2018-2019**

### **Report DRR19/033**

The Development Control Manager (Appeals and Planning Investigation) briefed the Committee regarding historic staffing issues and current staffing levels. With the additional provision of two full time temporary investigating officers, it had been possible to maintain current outstanding cases within target levels. It was hoped that at least one of the temporary positions could be upgraded to a full time contract.

A Member was pleased to note the increased enforcement of untidy site notices. Attention was drawn to section 3.9 of the report which referred to 'Operational Development', and the Chairman asked for an explanation of what this meant. Operational Developments were immune from enforcement activity if enforcement action was not taken within 4 years. The definition of 'Operational Development' was where operations were stated to result in some physical alteration to the land itself, as opposed to material changes of use which did not interfere with the actual physical characteristics of land.

A Member referenced case number 21 in the list of enforcement notices issued, and asked what 'commer' meant; it was clarified that this was an abbreviation for 'commercial'.

A Member queried why the Part 1 document which showed the list of enforcement notices issued over the last 12 months was not in Part 2 as in many cases the site/individual could be identified. The Development Control Manager explained that this was because the notices issued were statutory and in the public domain. The document in Part 2 was different as it was to do with cases currently under investigation or subject to an ongoing investigation.

The Chairman stated that there was much useful information in the report for Members. The Development Control Manager informed the Committee that he offered a Members' surgery as required.

**RESOLVED that the Planning Enforcement Progress and Monitoring Report for 2018-2019 is noted.**

## **12 ENFORCEMENT ACTIVITY UPDATE**

### **Report ES18046**

The Head of Service Food, Health and Safety and Licensing highlighted the main points of the Enforcement Activity Update report.

It was noted that under the Control of Pollution Act 1960, 64 notices had been served over the last financial year. These notices related to dust and noise emanating from construction sites. Notices had been issued under the Environmental Protection Act 1990 with respect to noise emanating from both

residential and commercial premises. A noise App had been developed to assist with this.

Members noted the significant number of enforcement notices issued by virtue of the Housing Act 2004. Previously enforcement was only applied with respect to properties comprising of three storeys. This element had now been removed under new legislation, and enforcement action could now be applied to single storey buildings.

Members were referred to the table of Licensing Hearings which detailed the type of licensing application and the outcome. It was noted that the licence for 'Two Ten' in Beckenham High Street had been revoked, and that the premises had now closed.

A Member highlighted the number of new HMOs (Houses of Multiple Occupation) that had been served with notices under the Housing Act 2004 (Part 2) where it was deemed that the fire precautions were inadequate. He asked if follow up work was undertaken regularly on the notices that had been served. The answer to this was yes. In the report it was noted that 12 premises had been served with these notices, and they had all complied.

A Member asked what was involved with respect to the cleansing of alleyways under the Public Health Act 1936. It was noted that 23 notices had been served, and the notices had been served due to problems with rats and mice. It was noted that ASBOs had now been replaced with Criminal Behaviour Orders.

The Interim Head of Service--Shared Parking Services provided an update on parking enforcement activity. It was noticeable that under the new contract with APCOA, the number of PCNs issued had dropped significantly and this was being looked into. Compliance with the terms of the contract needed to improve. Management action and the application of KPI penalties had mitigated the loss to the Council. A Member stated that in many cases the CEOs (Civil Enforcement Officers) were turning up at the wrong time, which was an indication of poor intelligence. The Interim Head of Service Shared Parking Services said that this was a matter that would be taken up with the contractor.

A Member asked if LBB could have a 'FAQ' section on the parking website. The response to this from the Interim Head of Service Shared Parking Services was positive, and it was stated that this was something that was being considered.

The Chairman said that he had tried calling the out of hours parking enforcement number, but had not managed to get a response. It was confirmed that this was a number that should be answered at all times, and this was another matter that the Interim Head of Service--Shared Parking Services would take up with the contractor.

**RESOLVED that**

- 1) The Committee receives an annual report on the service areas identified in the report
- 2) The Interim Head of Service--Shared Parking Services would contact APCOA to investigate why the out of hours parking enforcement number was not being answered
- 3) The Interim Head of Service--Shared Parking Services would contact APCOA to investigate why Civil Enforcement Officers were in some cases turning up to undertake enforcement work at the wrong time.

**13 PUBLIC PROTECTION & ENFORCEMENT PERFORMANCE OVERVIEW**

A discussion took place concerning fly-tipping, and it was noted that the Fly-Tipping and Enforcement Working Group met regularly and would provide six monthly updates. Increased targeted fly-tipping enforcement action was planned for the coming year. It was further noted that the contractors should clear fly tips on time, and there were financial incentives for doing so. Mention was made of a particular fly tipping incident where it would be required to remove the fly tip and block off the area with concrete blocks. This had been delayed out of respect for the fact that a neighbouring resident had recently passed away.

The Committee was informed that Star Lane had been blocked off for the last three months to prevent fly-tipping. This had proved successful and had reduced the amount of fly tipping tonnage by 135 tons and equated to savings of £25k. A meeting was going to be held the following week to discuss next steps. The number of arsons in Star Lane had significantly reduced.

It was noted that 'Community Impact Days' were now known as 'MOPAC' days, and Councillors were welcome to attend if they wished.

A Member commented on clean-up operations after burnt out cars were removed. He said that often the main shell of the car would be removed, but debris like broken glass was left behind. He requested that clean-up operations for burnt out cars be more thorough so that all debris was removed.

**RESOLVED that the Public Protection and Enforcement Performance Overview is noted.**

**14 WORK PROGRAMME**

**Report CSD19090**

Members noted the Work Programme for the Public Protection and Enforcement PDS Committee.

The Chairman explained that the police would be briefing the Committee in a different area for each meeting. On this occasion it had been regarding neighbourhood policing; at the next meeting it would be an update on the CID.

Rather than SLAM (South London and Maudsley NHS Foundation Trust) come to visit the Committee, the intention was that a member visit to the Bethlem Hospital be arranged instead.

Members were informed that the Coroner was keen for Members to visit the Coroner's Court, and she would be extending formal invitations regarding cases of interest.

**RESOLVED that the Work Programme report is noted.**

**15 LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION)(VARIATION) ORDER 2006, AND THE FREEDOM OF INFORMATION ACT 2000**

The Chairman moved that the Press and Public be excluded during consideration of the item listed below as it was likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the press or public were present there would be disclosure to them of exempt information.

**16 PLANNING ENFORCEMENT CASES PENDING CONSIDERATION**

Members noted the Planning Enforcement cases pending consideration.

**17 UPDATE ON THE FUTURE PROVISION OF HER MAJESTY'S POST MORTEM AND MORTUARY SERVICE**

Members noted the update regarding the future provision of Her Majesty's Post Mortem and Mortuary Service.

The minutes for this item were noted in the Part 2 minutes.

The meeting ended at 10.00 pm

Chairman

This page is left intentionally blank

Report No.  
CSD19122

London Borough of Bromley

PART ONE - PUBLIC

---

**Decision Maker:** Public Protection and Enforcement PDS Committee

**Date:** 10<sup>th</sup> September 2019

**Decision Type:** Non Urgent                      Non Executive                      Non Key

**Title:** **MATTERS OUTSTANDING**

**Contact Officer:** Steve Wood, Democratic Services Officer  
Tel: 020 8313 4316 E-mail: [stephen.wood@bromley.gov.uk](mailto:stephen.wood@bromley.gov.uk)

**Chief Officer:** Mark Bowen, Director of Corporate Services

**Ward:** N/A

---

1. Reason for report

1.1 **Appendix A** updates Members on matters outstanding from previous meetings.

---

## 2. RECOMMENDATION

2.1 The Committee is asked to review progress on matters outstanding from previous meetings.

<b>Non-Applicable Sections:</b>	Policy/Financial/Legal/Personnel
Background Documents: (Access via Contact Officer)	Previous Matters Arising reports and Minutes of meetings. Previous Agenda Document.

## Corporate Policy

1. Policy Status: Existing Policy
  2. BBB Priority: Safe Bromley
- 

## Financial

1. Cost of proposal: No Cost
  2. Ongoing costs: Not Applicable
  3. Budget head/performance centre: Democratic Services
  4. Total current budget for this head: £358,740
  5. Source of funding: 2019/20 revenue budget
- 

## Staff

1. Number of staff (current and additional): 8 posts (6.79fte)
  2. If from existing staff resources, number of staff hours: Completion of "Matters Arising" Reports for PP&S PDS meetings can take up to a few hours per meeting.
- 

## Legal

1. Legal Requirement: None
  2. Call-in: Not Applicable
- 

## Customer Impact

1. Estimated number of users/beneficiaries (current and projected): This report is intended primarily for Members of the Public Protection and Safety PDS Committee.
- 

## Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: N/A

<u>Minute Number/Title</u>	<u>Matters Arising</u>	<u>Update</u>
<p><b>Minute 6</b> <b>26<sup>th</sup> June 2019</b></p> <p><b>Matters Outstanding</b></p>	<p>It was resolved that the Head of Trading Standards and Community Safety report back to the Committee with an update on progress made with the development of the Knife and Serious Violence Action Plan.</p>	<p>The issue with the Knife Crime Action Plan related to whether MOPAC had been able to share best practice from the London wide submissions. The Head of Trading Standards and Community Safety had explained previously that MOPAC hadn't as yet done so, and the latest advice was that this would be picked up by the newly formed Violent Crime Reduction Unit later this year.</p>
<p><b>Minute 12</b> <b>26<sup>th</sup> June 2019</b></p> <p><b>Enforcement Activity Update</b></p>	<p>The Interim Head of Service--Shared Parking Services would contact APCOA to investigate why the out of hours parking enforcement number was not being answered.</p> <p>The Interim Head of Service--Shared Parking Services would contact APCOA to investigate why Civil Enforcement Officers were in some cases turning up to undertake enforcement work at the wrong time.</p>	<p>APCOA have confirmed that if the operator is unable to take the call, an answer phone is available for the member of public to leave their details on. The officer will either ring the member of the public back if they require any further information, if not they will log the request as normal.</p> <p>On the occasion that an error is made and a CEO is sent to a location where the restriction time is not applicable, this will be reported back to base and where necessary, they will note to return at the correct time later in the day. On some occasions the CEO attend late, outside the KPI time and this can result in the restriction also ending or missing the PCN.</p> <p>All requests are logged by an operative, they will then look on the CEO tracking to contact the nearest officer to attend the site.</p>
<p><b>Minute 2/1</b> <b>26<sup>th</sup> June 2019</b></p> <p><b>Mortuary Update</b></p>	<p>It was resolved that an update report be presented to the Committee at the September meeting.</p>	<p>The update report has been incorporated into the Part 2 Agenda.</p>

This page is left intentionally blank

Report No.  
FSD19076

London Borough of Bromley

PART ONE - PUBLIC

---

**Decision Maker:** PUBLIC PROTECTION & ENFORCEMENT PORTFOLIO  
HOLDER

**Date:** For pre-decision scrutiny by the Public Protection & Enforcement PDS  
Committee on 10<sup>th</sup> September 2019

**Decision Type:** Non-Urgent Executive Non-Key

**Title:** CAPITAL PROGRAMME MONITORING - 2018/19 OUTTURN

**Contact Officer:** Claire Martin, Head of Finance  
Tel: 020 8313 4286 E-mail: [claire.martin@bromley.gov.uk](mailto:claire.martin@bromley.gov.uk)

**Chief Officer:** Director of Finance

**Ward:** All Wards

---

1. Reason for report

On 21st May 2019 the Executive received a report summarising the outturn position on the capital programme. As the one and only scheme for the Public Protection & Enforcement (PPE) Portfolio was completed during 2018/19, this report provides details of the changes agreed by the Executive.

---

2. **RECOMMENDATION**

**The Portfolio Holder is asked to note and confirm the changes agreed by the Executive on 21 May 2019.**

## Corporate Policy

1. Policy Status: Existing Policy: Capital Programme monitoring is part of the planning and review process for all services. Capital schemes help to maintain and improve the quality of life in the borough. Effective asset management planning (AMP) is a crucial corporate activity if a local authority is to achieve its corporate and service aims and objectives and deliver its services. For each of our portfolios and service priorities, we review our main aims and outcomes through the AMP process and identify those that require the use of capital assets. Our primary concern is to ensure that capital investment provides value for money and matches the Council's overall priorities as set out in the Community Plan and in "Building a Better Bromley".
  2. BBB Priority: Excellent Council
- 

## Financial

1. Cost of proposal: N/A
  2. Ongoing costs: Not Applicable Nil
  3. Budget head/performance centre: Capital Programme
  4. Total current budget for this head: Nil
  5. Source of funding: Capital receipts
- 

## Staff

1. Number of staff (current and additional): 1 fte
  2. If from existing staff resources, number of staff hours: 36 hours per week
- 

## Legal

1. Legal Requirement: Non-Statutory - Government Guidance
  2. Call-in: Applicable
- 

## Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
- 

## Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A
2. Summary of Ward Councillors comments: N/A

### 3. COMMENTARY

#### Capital Outturn – variations agreed by the Executive on 21 May 2019

- 3.1 The capital outturn position for the capital programme was reported to the Executive on 21 May 2019. The final position for the CCTV control room scheme was £308k, compared to a budget of £340k. Executive approved the deletion of the £32k residual balance on the scheme, as the final retention sum for the contract has now been paid.

#### Post-Completion Reports

- 3.2 Under approved Capital Programme procedures, capital schemes should be subject to a post-completion review within one year of completion. After major slippage of expenditure in prior years, Members confirmed the importance of these as part of the overall capital monitoring framework. These reviews should compare actual expenditure against budget and evaluate the achievement of the scheme's non-financial objectives. A post-completion report on the CCTV control room scheme will be reported to this PDS committee this year.

### 4. POLICY IMPLICATIONS

- 4.1 Capital Programme monitoring and review is part of the planning and review process for all services.

### 5. FINANCIAL IMPLICATIONS

- 5.1 These were reported in full to the Executive on 21<sup>st</sup> May 2019.

<b>Non-Applicable Sections:</b>	Legal, Personnel & Procurement Implications, Impact on Vulnerable Adults and Children
Background Documents: (Access via Contact Officer)	Capital Outturn report (Executive 21/05/19)

This page is left intentionally blank

Report No.  
ES19061

London Borough of Bromley

PART ONE - PUBLIC

---

**Decision Maker:** PUBLIC PROTECTION & ENFORCEMENT PORTFOLIO HOLDER

**For pre-decision scrutiny by the Public Protection & Enforcement PDS Committee on**

**Date:** Tuesday 10<sup>th</sup> September 2019

**Decision Type:** Non-Urgent Non-Executive Key

**Title:** FOOD SAFETY SERVICE PLAN 2019 TO 2020

**Contact Officer:** Karen Ryan Lead Practitioner Food Safety Team  
Tel: 020 8313 4609 E-mail: Karen.ryan@bromley.gov.uk

**Chief Officer:** Colin Brand Director of Environment & Public Protection

**Ward:** (All Wards);

---

1. Reason for report

The Council is the Food Safety Authority under the Food Safety Act 1990 and has a duty to enforce food safety, food standards and feed requirements. The Food Standards Agency (FSA) requires the Council to publish an annual Food Safety Service Plan and that such plans have senior management or member approval.

This report sets out the Council's annual plan for effective enforcement of food safety legislation. The objective of the plan is to satisfy the FSA that the intended enforcement and inspection regime, ensures that food, in the Borough, is produced and sold under hygienic conditions, is without risk to health and is of the quality expected by consumers.

The plan has been developed to reflect progress made against the Action Plan submitted to the FSA September 2017 and to show the total resource available to the Council to deliver the service demands and review the outcomes of the service in the previous year.

---

2. **RECOMMENDATION(S)**

The Portfolio Holder is asked to:

2.1 Approve the Service Plan for the Food Safety Team.

- 2.2 Note the progress made against the resubmitted Action Plan - September 2017, agreed with the Food Standards Agency.
- 2.3 Note that the ability to achieve targets is reliant on maintaining the staffing levels and the ability to recruit to the vacant food safety posts.

#### Impact on Vulnerable Adults and Children

1. Summary of Impact: Premises providing food for vulnerable adults and children will continue to be inspected according to the risks they present to food safety.
- 

#### Corporate Policy

1. Policy Status: Existing Policy:
  2. BBB Priority: Children and Young People Excellent Council Quality Environment Safe Bromley Vibrant, Thriving Town Centres Healthy Bromley Regeneration:
- 

#### Financial

1. Cost of proposal: N/A
  2. Ongoing costs: N/A
  3. Budget head/performance centre: Food Safety
  4. Total current budget for this head: £575k
  5. Source of funding: Existing revenue budget 2019/20
- 

#### Personnel

1. Number of staff (current and additional): 7.54 FTE permanent and 3.0 FTE Temporary
  2. If from existing staff resources, number of staff hours:
- 

#### Legal

1. Legal Requirement: Statutory Requirement: Legal Requirement: Statutory Requirement:
  2. Call-in: Applicable:
- 

#### Procurement

1. Summary of Procurement Implications: The additional temporary food safety officers ordinarily need to be recruited through the Council's preferred employment agency, however, if they cannot provide the appropriately qualified officers, approval to use additional agencies has been agreed.
- 

#### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Estimated number of users/beneficiaries (current and projected): There are some 2600 registered food businesses in the Borough that come under the remit of the team for inspection. The protection afforded though those businesses being inspected extends to everyone who buys or eats food in the Borough.

---

#### Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable

### 3. COMMENTARY

- 3.1 Following the outcome of a Food Standards Agency (FSA) Audit of the Food Safety Service in April 2017, an action plan was agreed by the Portfolio Holder (29 June 17 Report ES 17041) . Following this, the Executive (9 August 2017) agreed to the additional resources sought as part of that report, and funding was given for 2 extra full time permanent and three full time temporary food safety officers for up to 18 months, to implement the action plan and clear the backlog of inspections, however, due to the national shortage of available qualified officers, an extension was agreed.
- 3.2 An updated action plan was submitted to the FSA and the Food Safety Service annual service plan was updated to reflect this (Report 27 September 2017 ES17071). In September 2018 the FSA reviewed the progress of the team against the updated action plan; the FSA noted the efforts that had been made and acknowledged the impact that the recruitment issues had on the progress to date. They further advised the Team to focus on completing the A -D inspections that were due and the overdue C-D inspections; in agreeing this strategy, they accepted that the focus would be shifted away from inspecting unrated premises; The Food Safety Plan for 2018-19 was amended to reflect this (Report 4 December 2018 ES 18093).
- 3.3 As stated in the FSA Action Plan, the main issue for the authority in 2017 was the number of overdue inspections and the number of unrated premises. In April 2018 there were 677 overdue food hygiene inspections. As a result of the refocus, and by employing a discrete pay per inspection regime, and with Officers working on overtime, significant progress was made against last year's action plan, and the number of overdue inspections for April 2019 was 69 (a reduction of 93%); these will be inspected this year. As such, the focus is now in reducing the unrated low risk businesses (approx. 425), and also for businesses placed outside of the inspection programme (for example chemists that sell sweets approx. 290). To facilitate this, a project is being undertaken to assess how many of these unrated businesses are still trading, as many may have closed without notifying the authority. Once a current number is established, their present food safety risk will be assessed and premises will be added to our inspection programme where required. The inspection of the established relevant unrated businesses will be delivered by a discrete project which should be completed by March 2020. The team has submitted the delivery plan to the FSA; they have noted the significant improvements made regarding overdue premises, and have indicated that the 2017 Action Plan will be signed off once the delivery plan has been approved.
- 3.4 The Food Team is run and managed in-house with 7.54 X permanent FTE equivalents, and 1.98 X FTE agency staff (3 X FTE agency staff are budgeted for); staffing resources are covered in full in section 6 of the Food safety Plan 2019-20. A minimum of 6.8 X FTE competent food safety officers are required to deliver the 2019-20 inspection programme (1,104) and to ensure a backlog of inspections does not build up in the future. In addition to the programmed inspections, the team also carries out additional routine work, responds to food poisoning outbreaks, investigates complaints about food businesses and carries out enforcement. The level of enforcement continues to rise year on year, and the marked increase in enforcement activity is directly related to the increased number of inspections made this year to premises which were previously overdue. If the unprecedented enforcement work as detailed in 5.9 of the plan continues at the same or similar rate, and if recruitment and retention issues persist, the ability to deliver the inspection regime will be compromised.
- 3.5 A copy of the annual service plan is attached for Members approval; section 8 shows Progress against the KPI's in the FSA Action Plan since April 2019, section 9 shows the Key Performance Areas for 2019-20. Appendix B provides a performance review for 2018-19 and Appendix C shows the resources needed to carry out the plan.

#### **4. IMPACT ON VULNERABLE ADULTS AND CHILDREN**

- 4.1 Premises providing food for vulnerable adults and children will continue to be inspected according to the risks they present to food safety.

#### **5. POLICY IMPLICATIONS**

- 5.1 Providing a resilient Food Safety Service in compliance with the FSA audit supports Building a Better Bromley through being an Excellent Council and maintaining minimum standards in food business helps to ensure Bromley is both safe and healthy.

#### **6. FINANCIAL IMPLICATIONS**

- 6.1 In 2019/20 the Council has a dedicated budget of £412k to run the food safety service. This includes a sum of £6.4k set aside for food sampling and analysis. There are also additional resources of £163k for three temporary staff appointed to clear the backlog of food inspections.
- 6.2 The overall cost of the food service for 2018/19 was £493k, of which £78k was for additional staff.

#### **7. PERSONNEL IMPLICATIONS**

- 7.1 We can only achieve the targets set out in the service plan and meet the FSA expectations following their audit if we are able to recruit to available posts and retain staff.

#### **8. LEGAL IMPLICATIONS**

- 8.1 The Council is the Food Authority under the Food Safety Act 1990. Our performance is monitored by the FSA who have undertaken an audit and published its findings. They will continue to monitor our performance closely until we have reduced our backlog of inspections and have established a resilient service. Once compliant, the FSA have made it clear they will continue to monitor our performance via a balance score card approach and will intervene if our performance deteriorates.
- 8.2 The powers of the FSA are derived from Section 40 Food Safety Act 1990. The Secretary of State may issue code of practice as regards the execution and enforcement of the Act and Regulations. This is the 'Food Law Code of Practice (England). Where a Food Authority fails to comply with the Code of Practice; the FSA can issue a direction to them requiring them to take specified steps to comply. The recent audit by the FSA is not a formal Direction under Section 40 of the Food Safety Act 1990 but is an informal intervention designed to assist the Council comply with its duties.
- 8.3 The Council as the Food Authority shall have regard to the Code of Practice and shall comply with any direction given by the FSA (Food Safety Act 1990 Section 40(2)).
- 8.4 Under Section 42 Food Safety Act 1990 the Secretary of State may order another food authority or the Food Standards Agency to discharge our duties.

#### **9. PROCUREMENT IMPLICATIONS**

- 9.1 The additional temporary food safety officers ordinarily need to be recruited through the Councils preferred employment agency, however, if they cannot provide the appropriately qualified officers, approval to use additional agencies has been agreed.

<b>Non-Applicable Sections:</b>	
Background Documents: (Access via Contact Officer)	Reports to: ES16008 20 January 2016, PP&S PDS ref ES 17041 29 June 2017 and PP&S PDS ref ES 17071 27 September 17 Report 4 December 2018 ES 18093

**London Borough of Bromley  
Environmental Services  
Public Protection**

**Food Standards Agency Framework Agreement on  
Local Authority Food Law Enforcement**

**Food Service Plan 2019-20  
and  
Performance Review 2018-19**

## **1. Introduction**

- 1.1 This Food and Safety Service Plan 2019-20 covers the key areas of Food Safety and the relevant management arrangements and objectives against which the Council will monitor service delivery, and has been compiled in accordance with the guidance issued by the Food Standards Agency (FSA).
- 1.2 The FSA audits Local Authority food and feed enforcement activities and publishes reports of their findings. Local Authorities are audited against the feed and food law standard in the Framework Agreement, which is a document that sets out the minimum standards of performance required from Local Authorities, across the full range of their feed and food law enforcement activities.
- 1.3 During the last audit in 2017, the Council was not deemed to have met all the standards in this agreement, and the lack of dedicated resources was identified as the main reason why. As a result an action plans were implemented in April and September 2017, and funding was secured for additional resources.
- 1.4 This service plan, is subject to approval by the Public Protection & Enforcement PDS Committee, and makes clear the arrangements Bromley Council will put in place to ensure that there are adequate arrangements for food safety enforcement moving forwards, it will demonstrate the progress against the FSA priorities expressed in the action plan submitted in September 2017, provide a performance review against the previous year's plan (2018-19), and state the objectives for the 2019-20 period.

## **2. Aims, Objectives and Description of the Service**

- 2.1 Bromley's Food Safety Service is delivered in accordance with the Food Law Code of Practice (FLCoP), the latest version of which was released in March 2017. The FLCoP is issued by the FSA and governs the manner in which a Competent Authority enforces relevant food safety legislation and delivers 'official controls' to secure food law compliance. The Code is issued under the Food Safety Act 1990 and has statutory force.
- 2.2 The key objectives of the service are to:
  - Ensure by education and enforcement that food intended for human consumption which is produced and/or sold in Bromley is safe to eat and complies with food safety requirements;
  - Deliver a programme of inspections and interventions in relation to primary producers and food businesses, on a risk-based frequency;
  - Provide support to help businesses comply with their legal obligations;
  - Investigate and take appropriate action concerning complaints about food and food premises to protect public health;
  - Provide a fair and equitable service that provides value for money;
  - Take enforcement action when necessary in a consistent, transparent and proportionate basis;

- Carry out targeted and reactive environmental and food microbiological sampling;
- Prevent the spread of specified infectious and food borne diseases;
- Advise and educate consumers and service users on food safety matters;

### **3. Links to Corporate Plans and Objectives and Regulation Policy**

3.1 The service, and the manner in which it is delivered, contributes to three key priorities as set out in the Council's organisation vision of Building a Better Bromley particularly:

- Vibrant Town Centres' - by engaging with and supporting businesses to thrive, and through enforcing where necessary,
- Safe Bromley –by safeguarding the vulnerable particularly in relation to food safety in educational and care homes settings
- Healthy Bromley' – by supporting Health and Well Being outcomes.

3.2 The work of the Team also delivers The Public Protection & Enforcement Portfolio Plan 2019 -20 in particular to Outcome 3 - We will support and regulate businesses by:

- inspecting 100% of high-risk food businesses to ensure food safety standards are met. Investigating and taking appropriate action concerning complaints about food and food premises, to protect public health and
- Undertaking intelligence-led food sampling and participation in regional sampling programmes for both analysis and examination

3.3 In addition, the Public Protection Division has signed the Cabinet Office's Enforcement Concordat, and applies the Environmental Enforcement Policy to all enforcement action taken in relation to the food service. This policy is located in the Legal Process Quality Manual of Public Protection "A Guide to Our Enforcement Policy", and has been produced setting out the principles of the policy and enforcement actions. The policy is publicised on the Council's website. Finally, the Food Safety Team supports the aims of the Regulators Code.

### **4. Background:**

#### **Profile of the Food Industry in Bromley**

4.1 The borough of Bromley is the largest borough in London by area, and occupies 59 square miles (152.8 km<sup>2</sup>) of which the majority is Metropolitan Green Belt land; 30 % of the land is categorised as farm land.

- 4.2 It has a population of over 330,000 people, with a black and minority ethnic (BAME) population of 19% (this is less than most London boroughs). 94.2% of the population speak English. The average age is 40. 72% of the residents are owner occupiers and over 78% of the economically active population are in employment, with only 4% being unemployed.
- 4.3 There are four town centres; Bromley, Orpington, Beckenham and Penge, and the latest figures show that there are over 14,000 businesses in the borough, mostly operating in property, finance, retail and construction. The majority of businesses are small with less than nine people in each. Public administration, education and health are the boroughs largest employers. Business and financial services are the second largest employers. Biggin Hill airport, the Princess Royal University, Orpington, Beckenham Beacon and Bethlem Royal NHS Hospitals are located within the borough.

### **Organisational Structure**

- 4.4 The Food Safety Team sits within the Public Protection Division of the Environmental and Public Protection Department, the feeding stuffs and alcohol authenticity enforcement are carried out by the Trading Standards team, Kent Scientific Services is appointed as the Food Analyst, and Public Health England (PHE) acts as the Council's Food Examiner.
- 4.5 Organisational structure charts are provided in Appendix A.
- Scope of the Food Safety Service**
- 4.6 Food safety activities currently undertaken include:
- Programmed inspections and interventions at food businesses at a frequency set out in the FLCoP risk rating scheme;
  - Revisits to premises following programmed inspections to secure compliance with legal requirements;
  - Assessing food hygiene and food standards issues (e.g. food allergens and food fraud) during premises inspections;
  - Carrying out assessments and updating data for the National Food Hygiene Rating Scheme;
  - Food microbiological and compositional sampling which is either intelligence-led or forms part of national sampling programmes;
  - Investigating complaints about the standard of hygiene in food businesses in Bromley;
  - Investigating complaints about food that has been produced and/or sold in Bromley;
  - Investigating food poisoning and food borne infectious disease cases;
  - Responding to national Food Safety Alerts and Incidents issued by the FSA;
  - Promoting food safety by education, training and business support and working with other organisations to assist food business operators.

4.7 In addition, the following additional services are provided alongside the above:

- Health and safety “hazard spotting” is carried out in food premises where the local authority is the enforcing authority and where significant health and safety matters are noted. This is in line with the Health and Safety Executives (HSE) National Local Authority Enforcement Code;
- Advice about infection control procedures is given during visits to child day care settings;
- Responding to Freedom of information requests;
- Information sharing in accordance with General Data Protection Regulations.

### **Service demand**

4.8 In April 2019 2600 food premises were registered in Bromley, many of which are categorised as Small /Medium Enterprises (SME). 555 new premises were registered in 2018/19, which equates to a 67% increase on the number of new businesses (333) registered in 2017-18.

4.9 The business types for food premises are varied and include:

- 11 third world country food importers;
- 43 supermarkets;
- 6 approved premises;
- 1 FSA approved catering butcher
- 2 weekly market and several occasional and visiting markets and events.
- 1 Airport
- 3 NHS hospitals

4.12 Demands on the service continue to be high. In 2018/19, 1296 programmed inspections within food businesses were achieved which represents a 102% increase on the number accrued out in 2017/18 (640). Additionally, 425 reactive service requests were dealt with, a 12% (378) increase compared with on 2017/18. The focus moving forwards will remain on poorly performing and high risk food businesses; this approach has led to an increase in the level of enforcement activity since in 2018/19, which in turn has an impact on the resources available to carry out programmed inspections. Additionally, the team has submitted a delivery plan to the FSA that will address the backlog of low risk unrated premises.

## **5 Service Delivery 2019-20**

## Food Premises Inspections, Interventions, Ratings and Enforcement

- 5.1 Food businesses will continue to be risk-rated according to prescribed criteria relating to food type, method of processing, customers at risk and level of compliance. Businesses will then be inspected on the basis of an intervention risk rating which determines the frequency of inspection. Inspection frequencies are set out in the FLCoP.
- 5.3 The risk profile of food businesses (with inspection intervals) in Bromley, as at 1st April 2019 is shown in Table 1.

**Table 1 Risk Profile by Category with Inspection Intervals**

Rating Category	Minimum Inspection Frequency	Number
A	6 Monthly	4
B	12 Monthly	112
C	18 Monthly	565
D	2 Yearly	763
E	3 Yearly or Alternative Enforcement Strategy	443
Outside the inspection programme	none	288
Unrated	Awaiting Inspection	424
<b>Total</b>		<b>2,599</b>

- 5.4 E-rated businesses will be dealt with through an Alternative Enforcement Strategy (self-assessment or inspection on an alternate cycle) where possible. Follow-up inspections following self-assessment will be carried out if deemed necessary i.e. if the risk profile of the business has increased since the last assessment.
- 5.5 New premises are to receive a food safety inspection within 28 days of registration to comply with the FLCoP. However, this is not always possible. We therefore aim to inspect new businesses deemed to be high risk within 3 months of registration e.g. caterers. New premises which are deemed to be low risk e.g. home cake-makers will be now be added to the inspection programme. These businesses make up the vast majority of the unrated premises which are awaiting an inspection.

- 5.6 After each inspection food businesses are rated under the national Food Hygiene Rating Scheme (FHRS), this gives a measure of compliance against three key criteria: hygiene practice, premises structure and confidence in management. The rating scale ranges from 5 ('very good') to zero ('urgent improvement necessary'). Most food businesses are included in the scheme except those that do not supply food directly to members of the public, e.g. food manufacturers, are exempted.
- 5.6 The FHRS profile of the registered food businesses in Bromley as at 1<sup>st</sup> April 2019 is shown in Table 2

**Table 2 FHRS Profile for Bromley May 2019**

<b>Rating</b>	<b>Descriptor</b>	<b>Number</b>
0	Urgent improvement necessary	3
1	Major improvement necessary	62
2	Improvement necessary	59
3	Generally Satisfactory	281
4	Good	343
5	Very Good	1,038
	Total no of rated premises	1,786

- 5.7 To reduce the burden on business and to increase efficiency, food standard and hygiene inspections will be combined where feasible, however, separate food standards inspections will be carried out in high risk premises. Premises given a food hygiene rating of 0 - 2 will receive additional revisits and written guidance to ensure compliance and improved standards. 0-1 rated businesses will also be offered additional 1-2-1 coaching to help them to comply. Formal action will be considered where informal action has not been successful; this is in line with our Enforcement Policy.
- 5.8 Food safety enforcement will continue to be undertaken in a graduated manner, and in accordance with the Enforcement Policy and FSA guidance. Informal action, advice, education and persuasion are the usual methods of achieving compliance but other enforcement measures (including serving statutory notices and prosecutions) will be taken if the circumstances dictate.
- 5.9 The action taken will depend on the issues identified and the risk presented to the public. In 2018/19 the level of enforcement/complex work carried out by the team was at an unprecedented level including:

**48 food safety improvement notices**

**1 successful prosecution**  
**8 simple cautions administered**  
**4 voluntary closures of food premises**  
**2 voluntary surrenders of unfit foods**  
**2 product withdrawals of unsafe food**  
**3 food poisoning outbreaks investigated**

Much of this marked increase in enforcement activity is directly related to the increased number of inspections made during 2018/19 to premises which were previously overdue.

#### **5.10 Food Complaints and Service Requests**

5.11 The team will respond to complaints about food and food premises within the borough where a breach of food safety legislation is suspected. The speed of response and level of investigation will depend on the severity of the complaint. This will be decided by the investigating officer with advice from the Lead Practitioner for food and/or the team manager, as required and in accordance with our internal procedures. Urgent complaints will be responded to within 24 hours and non-urgent ones within 5 working days.

#### **5.12 Primary Authority Partnerships**

5.13 Currently there are no Primary Authority partnerships in Bromley, however, the Home Authority principles will be followed when dealing with requests about or from premises based in our borough, even where no formal agreement exists.

#### **5.14 Advice to Businesses**

5.15 The provision of advice and guidance to secure compliance with food law is an integral part of the work carried out by the service. Advice to existing food businesses will continue to be offered during inspections and revisits, and this includes giving businesses advice on allergen labelling.

5.16 Businesses seeking advice which is not directly related to a current food safety inspection or investigation will be directed to our website where food safety advice is available on a self-serve basis. Where this is insufficient to meet the businesses needs, they may have to seek advice from an external source such as a food safety consultant.

#### **5.17 Food Sampling**

5.18 Food sampling is an essential part of our enforcement service and is carried out in line with our sampling policy and programme. Our food sampling will continue to be intelligence led, focusing on existing and emerging issues, especially for food manufactured in the borough or imported from third countries. Where possible, food sampling will be combined with food inspections or revisits. The Team will also continue to participate in the South East London Food Liaison Group, London Food Coordinating Group (FLCG), Food Standards Agency (FSA) and Public Health England (PHE) and EU sampling programmes for both analysis and examination.

#### **5.19 Control and Investigation of Food Related Cases and Outbreaks**

5.20 The Public Health (Control of Disease) Act 1984 as amended, and the Public Health (Infectious Disease) Regulations 1988 require certain communicable diseases to be notified to the Proper Officer within a Local Authority. The Council acts as the Proper Officer. Food Team officers investigate food borne diseases and food poisoning to establish the source of infection and prevent further spread. Outbreaks will be investigated along with the South East London Health Protection Team, who provide infection control advice along with statistical analysis.

5.21 Infectious disease investigations are made in accordance with the South London Health Protection Disease Protocols. Priority will be given to those cases involving persons who work in the food industry or have contact with vulnerable groups. The Council will continue to work in partnership with PHE to prevent and control cases and investigate wider outbreaks of food related disease that fall outside the scope of the single case plan.

5.22 In 2018-19, 405 infectious disease notifications were received by the Council, which is an 8% decrease on the previous year (441). It is generally recognised that the number of reported cases is a small proportion of the actual number of cases of food borne illness each year in the UK.

#### **5.23 Food Safety Incidents and Alerts**

5.24 There is a documented Food Alert and Incident procedure covering the issue of warnings arising from a food related issue in the borough and the response to warnings issued by the FSA.

5.25 Responses to Food Incidents and Alerts are determined by the Head of Service and Lead Practitioner in consultation as necessary with the Food Standards Agency, PHE and Trading Standards etc.

- 5.26 In March 2018 the FSA updated its communication platform to improve the notification of incidents and food hazards / alerts to local authorities. Although very few notifications require any form of direct action on the part of the service, these continue to emphasise the value of food safety intelligence and 'horizon scanning' in reducing public health risks.
- 5.27 4 food alerts requiring action was received in 2018-19, whereas only 1 was received in the previous year. It is difficult to predict the number of warnings likely to be received in 2019 /2020; however, should incidents rise there will be a negative effect on the ability of the team to achieve the programmed work.

#### **5.28 Liaison with Other Organisations**

- 5.29 The Service remains committed to formal inter-agency liaison relationships as set out in the FLCoP. Additional communication will continue to take place at officer level during the process of investigating offences, sharing information and exchange of intelligence.
- 5.30 The Team is a member of the South East London Food Liaison Group, Environmental Health Working Group and the Public Health Group, London Food Fraud group and has designated members to attend. It will also continue to liaise with other enforcement organisations such as the Food Standards Agency and Department for Environment, Food and Rural Affairs etc, other Environmental Health Departments and professional organisations such as The Association of London Environmental Health Managers (ALEHM).
- 5.31 The Team will continue to send representatives to the South East London Food Liaison Group, Environmental Health Working Group, Public Health Group and ALEHM.

#### **5.32 Promoting Food Safety**

- 5.33 The promotion of food safety issues is an important means to secure food safety compliance in food businesses. Our website and press releases will be used to highlight key issues and the team will participate in the FSA Food Hygiene Rating Scheme and will encourage businesses to display the rating received.

#### **5.34 Team Performance against the 2018-19 Plan**

- .35 A summary of the key activities undertaken by the team for 2018-19 is shown in Appendix B.

## **6. Resources**

6.1 In 2019/20 the Council has a dedicated budget of £412k to run the food safety service. This includes a sum of £6.4k set aside for food sampling and analysis. There are also additional resources of £163k for three temporary staff appointed to clear the backlog of food inspections.

6.2 The overall cost of the food service for 2018/19 was £493k, of which £78k was for additional staff.

## **6.3 Staff Development**

6.4 A minimum of 20 hours CPD training each year on food safety related topics is required by the FLCoP and this will be met via a mixture of in-house and external training, and through 1-2-1's, cascade training, staff meetings and online training.

## **6.5 Staffing Resources**

6.6 Following a FSA audit in April 2017 where the food serviced was found to be under resourced an Action Plan was agreed and additional funding was provided for 2 full time permanent and 3 full time temporary food safety officers for up to 18 months, however, this term has been extended due to nationally recognised issues regarding the shortage of qualified competent officers.

6.7 Despite the additional funding being made available, the recruitment issues remain. With regards to the 3 temporary officers for which additional funding was received, 4 individual officers were recruited during the year but the time they spent with Bromley amounted to only 0.76 X FTE, as a result a proactive meeting was arranged with the FSA in September 18 to discuss matters. The FSA noted the efforts that had been made and acknowledged the impact that the recruitment issues had on the progress against the action plan. They further advised the Team to focus on completing the A -D inspections that were due and the overdue C-D inspections; in agreeing this strategy, they accepted that the focus would be shifted away from inspecting unrated premises. As a result of the refocus in September 18, by employing a limited pay per inspection regime, and by offering overtime to available Officers, significant progress was made against the action plan.

6.8 2 X FTE permanent officers were recruited in the first quarter of 2018; however one left the council in November 2018 to take up a role with another LA and thus creating a vacant post. This post has been covered by an officer on a fixed term contract pending receipt of permission to recruit. Permission has since been granted and the officer covering the post was successful at interview and took up the permanent post on 1<sup>st</sup> August 2019. One permanent officer returned from maternity leave in April 19 and is using her accrued annual leave to work 4 days a week for 12 months. Another fulltime permanent officer has requested to reduce her hours to 0.6 X FTE from June 2019, and it is planned to fill this with a permanent part time post.

6.9 The Food Team is run and managed in-house with 7.54 permanent FTE equivalent:

- **6 FTE Food safety officers**
- **1 FTE Lead Practitioner, who does not have a caseload.**
- **0.54 FTE Technical Support Officer.**

**In addition to permanent funded staff there are 3.0 FTE agency staff (1.98 are currently employed)**

#### **6.10 Inspection Programme 2019/20 and Required Resources**

In 2019-20 the following inspections are due to be undertaken:

- **628 Category A – D Food Hygiene inspections**
  - **69 Overdue inspections**
  - **7 Category A Food Standards inspections**
  - **50 Rescore requests (approx.)**
  - **350 (approx.) newly registered businesses**
- Total 1,104**

6.12 In addition to the 1,104 inspections that need to be carried out, there is the additional routine and enforcement elements that must be covered. A minimum of 6.8 X FTE competent food safety officers are required to deliver the 2019-20 inspection programme and to ensure a backlog of inspections does not build up in the future. However, if the unprecedented enforcement work as detailed in 5.9 continues at the same or similar rate, and if recruitment and retention issues persist the ability to deliver the inspection regime will be compromised.

6.13 There are also approximately 425 unrated businesses, which have been determined (by questionnaire) to present a low risk e.g. home based cake makers. Also, approximately 290 premises which have been placed outside the inspection programme as they present an insignificant food safety risk e.g. chemists, green grocers, non-food retailer selling confectionary. Notwithstanding this, the FLCoP requires that all premises receive an inspection before they can be dealt with using alternative enforcement strategies. To facilitate this, a project is being undertaken to assess how many of these unrated businesses are still trading, as many may have closed without notifying the authority. Once the current number is established, their present food safety risk will be assessed and with premises added

to our inspection programme where required. The inspection of the established relevant unrated businesses will be delivered by a discrete project, and the team has submitted the delivery plan to the FSA, once approved they have indicated that the action plan will be signed off.

6.14 All food safety legislation enforced within the UK is EU legislation. When the UK leaves the EU, this legislation will be replaced with domestic legislation. The impact of this change on food safety enforcement is unknown however it is likely the team will be likely to issue more food export certificates.

6.15 A summary of staff resources required for the Food Service delivery is provided in Appendix C.

## **7. Quality Assessment**

7.1 The team has reviewed the documented internal monitoring procedures, and has subscribed to RIAMS to ensure that it covers the full range of food law enforcement activities, in accordance with the Food Law Code of Practice and centrally issued guidance. In addition, activities which are used to monitor and maintain service quality will include:

- 6 weekly team meetings;
- Review by the Lead Practitioner of any FHR inspection where the risk rating of A changes.
- Peer review of statutory notices before service;
- Annual post inspection checks by the Lead Practitioner of inspections and service requests;
- Benchmarking activities and information exchange between Bromley and the South East London Food Liaison Group;
- Examination of any customer complaints;
- Examination of any appeals against enforcement notices
- Examination of appeals against Food Hygiene Ratings

## **8. Progress against the KPI's in the FSA Action Plan since April 2019**

8.1 The main issue for the authority was the number of overdue inspections and unrated premises. In April 2018 there were 677 overdue food hygiene inspections, whereas the number for April 2019 was 69 which is a reduction of 93%. The FSA noted this significant improvement in their latest correspondence in July 19, and the delivery plan for the backlog of unrated low risk premises is being considered, and as previously mentioned it is anticipated that the FSA Audit will be closed once the delivery plan has been approved.

## 9. Key Performance Areas for 2019-20

	OBJECTIVES	PERFORMANCE MEASURES
<b>9.1</b>	<b>Food Premises Interventions</b>	
1	To carry out 1104 due food hygiene interventions, largely by inspection, including rescore requests. <b>This is a KPI.</b>	100% of all inspections due
2	To reduce the backlog of high risk unrated premises by 100%, focussing on high risk businesses. <b>This is a KPI.</b>	High risk unrated inspections reduced by 100 % = 69
3	To assess the food hygiene risk presented by the low risk unrated businesses.	No target outcome based
4	To carry out 250 food standards interventions, largely by inspection. <b>This is a KPI.</b>	100% of food standards interventions carried out.
5	To send up to 600 schedules of improvement / warning letters to improve standards following interventions.	Number of schedules of improvements / warning letters sent =>600
6	To maintain the percentage of premises broadly compliant* for food hygiene at the time of inspection at 70%. (* Food Hygiene Rating of 5,4 or 3) <b>This is a KPI.</b>	Number of Premises broadly compliant as a % =>70%
7	To carry out up to 200 follow-up visits, focusing on zero - 2 star premises.	Number of follow-up visits carried out. =>200
8	To improve the 3 rated zero premises.	Number of zero rated premises which have improved their rating =3.
9	To serve improvement notices on all non-compliant businesses where informal action has been unsuccessful.	Number of non-compliant businesses and number improvement notices served = 100%
10	To prosecute / offer simple cautions to persistent non-compliant food business operators where other actions have been unsuccessful.	Number of prosecutions/simple cautions offered – outcome based

<b>9.2</b>	<b>Food Complaints /Service Requests</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To respond to up to 300 complaints/enquiries about food and food premises within 5 working days (80% target).	Number of complaints/service enquiries responded to within 5 working days = 80%.
<b>9.3</b>	<b>Home Authority Principle/ Primary Authority Partnerships</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To use Primary Authority Inspections forms where appropriate and refer to the Primary Authority to resolve issues found during inspection.	No performance measure
2	To refer to Primary Authorities when dealing with food complaints about food manufactured outside the Borough.	No performance measure
<b>9.4</b>	<b>Advice to Food Businesses</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To continue to provide advice to business during inspections.	Advice given at every inspection = 100%
<b>9.5</b>	<b>Food Inspection and Sampling</b>	
	<b>OBJECTIVES</b>	
1	To participate in South East London Food Liaison Group, London Food Coordinating Group (FLCG), Food Standards Agency (FSA) and Public Health England (PHE) and EU sampling programmes for both analysis and examination. .	Number of food samples analysed or examined +=
2	To carry out intelligence-led local sampling projects as a result of inspections, complaints or other information	
<b>9.6</b>	<b>Control and Investigations of Outbreaks and Food Related Infectious Disease</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To investigate cases of food poisoning or suspected food poisoning connected with premises within the Bromley, in line with South East London Health Protection Team guidelines	Number of cases reported against Number investigated = 100%
2	To investigate outbreaks of food poisoning/suspected food poisoning/viral gastroenteritis.	Number of outbreaks reported against Number investigated = 100%
<b>9.7</b>	<b>Food Safety Incidents</b>	

	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To respond to all food alerts and other food safety incidents issued by the FSA, as appropriate.	Number of food alerts/incidents = 100% of applicable alerts
<b>9.8</b>	<b>Liaison with Other Organisations</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To ensure the food service liaises with and participates in joint initiatives with other Council Departments, organisations and Borough as required.	Attendance at the South East London Food Liaison Group, Environmental Health Working Group, Public Health Group and ALEHM.
2	To send representatives to the South East London Food Liaison Group, Environmental Health Working Group, Public Health Group and ALEHLM	Attend 6 meetings
<b>9.9</b>	<b>Food Safety and Standards Promotion</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To update the food service's website.	Evaluated by the Website Coordinator.
2	To publicise food hygiene myths during Food Safety Week	Prepare press release
3	To continue to participate in the FSAs FHRS scheme	No performance measure.
<b>9.10</b>	<b>Health and Safety in Food Premises</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To carry out up to health and safety "hazard spotting" in food premises where significant offences are noted.	Number of health and safety "hazard spotting" inspections carried out
2	To liaise with the Health and Safety Team where formal action in food premises is required.	No performance measure.

## 10. Review

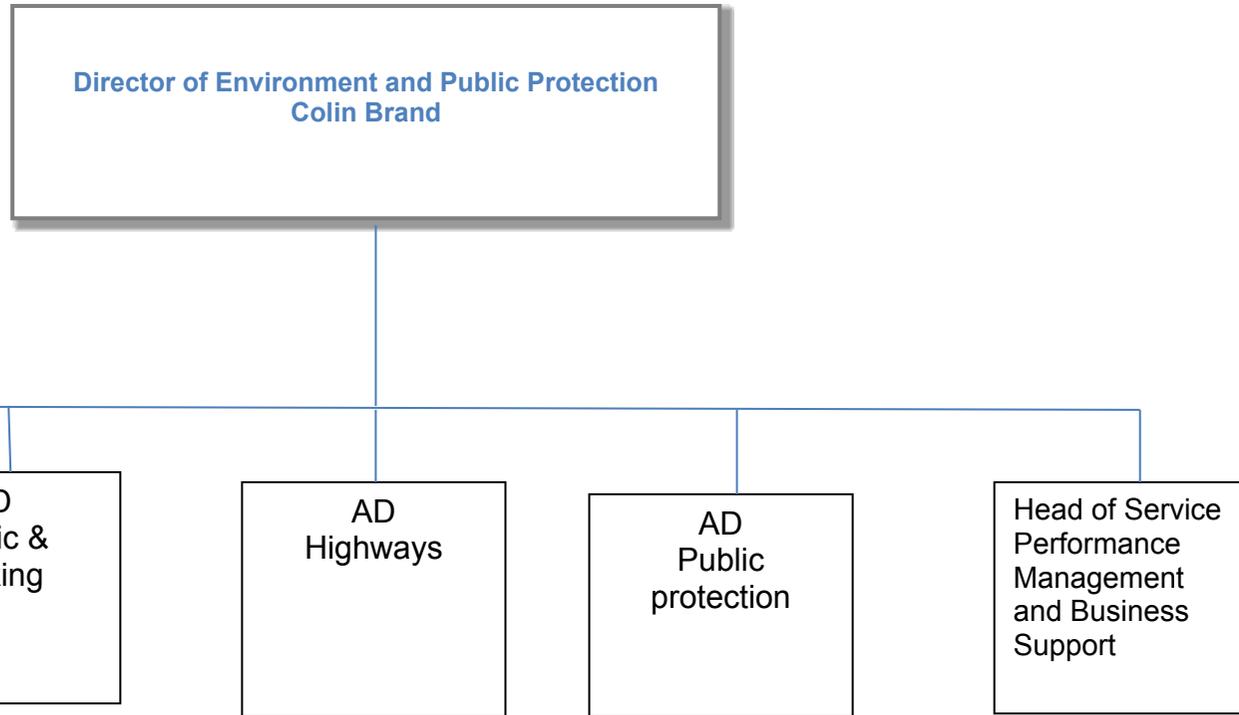
10.1 The process of review of the Plan as a whole will be undertaken in March next year based on:

- performance and resources available over the previous 12 months;
- responses to feedback from local businesses and the community;
- observations from members and the food safety team;
- advice and guidance issued by the FSA and other agencies;

- 10.2 The review of this document will then inform the development of the Food Safety Plan for 2020 / 2021 which will be scheduled for member consideration in September 2020.
- 10.3 Review of officer workload and priorities will be done on an ongoing basis throughout the year.

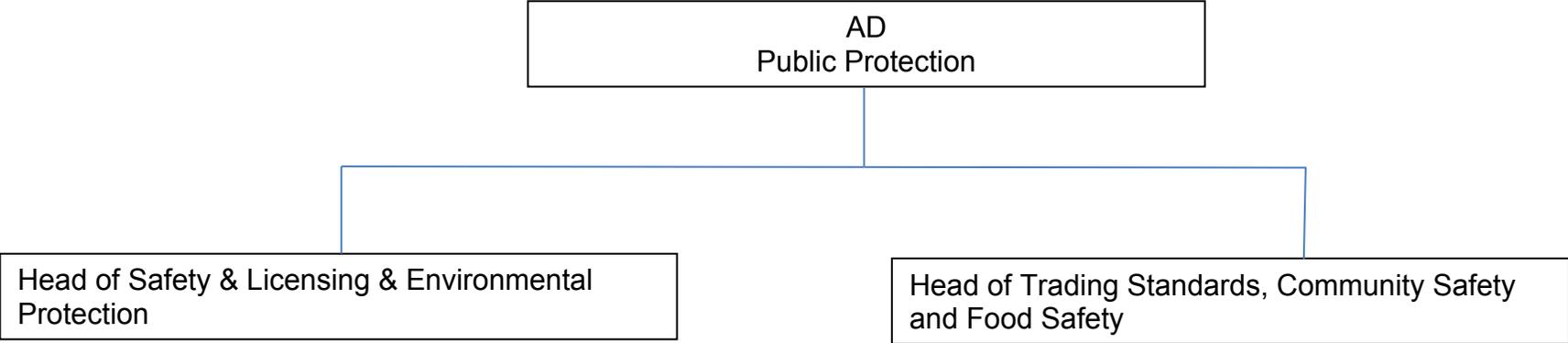
**Appendix A - Organisational Structure Charts**

**Environment and Public Protection**



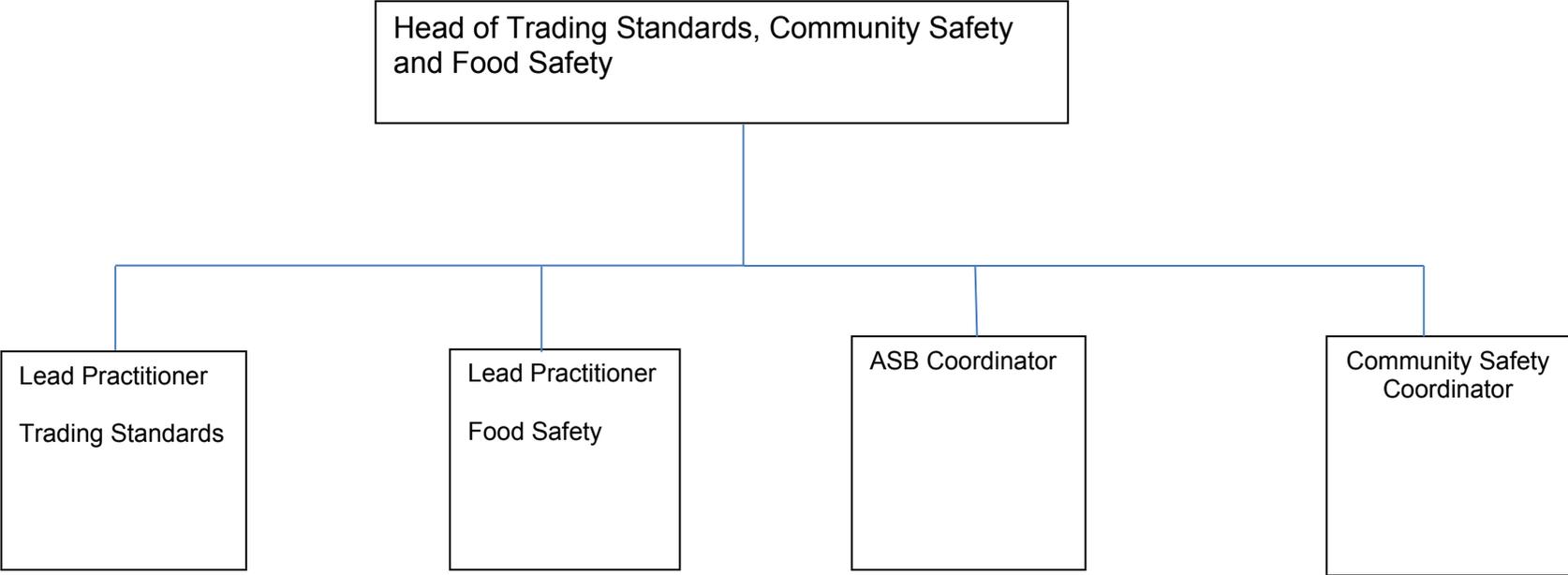
Appendix A - Organisational Structure (contd.)

Public Protection



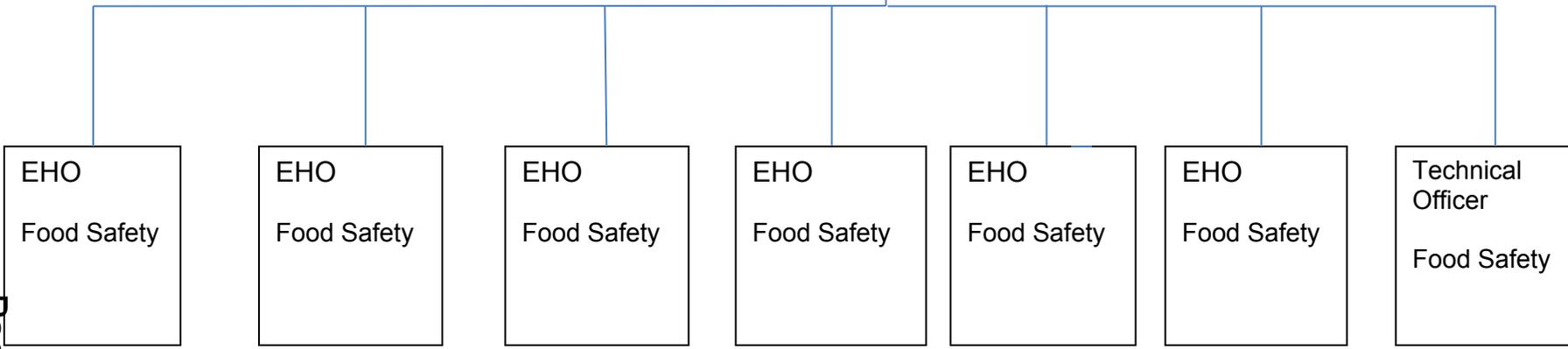
Appendix A - Organisational Structure (contd.)

Trading Standards, Community Safety, Food Safety



Appendix A - Organisational Structure (contd.)

**Food Safety**



**APPENDIX B - PERFORMANCE REVIEW 2018-19**

	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
<b>8.1</b>	<b>Food Premises Interventions</b>	
1	To carry out 853 due food hygiene interventions, largely by inspection, including rescore requests. <b>This is a KPI.</b>	830 FH inspections carried out. This is 97% of all inspections due.
2	To reduce the backlog of overdue inspections by 100%. <b>This is a KPI</b>	Overdue inspections reduced by 90% with 69 remaining.
3	To reduce the backlog of high risk unrated premises by 100%, focussing on high risk businesses. <b>This is a KPI.</b>	High risk unrated inspections reduced by 100 %
4	To carry out 250 food standards interventions, largely by inspection. <b>This is a KPI.</b>	1065 Food Standards were carried out = 100+ % of food standards interventions carried out.
5	To send up to 600 schedules of improvement / warning letters to improve standards following interventions.	. Number of schedules of improvements / warning letters sent =1439
6	To maintain the percentage of premises broadly compliant* for food hygiene at the time of inspection at 70%. (* Food Hygiene Rating of 5,4 or 3) This is a KPI.	Number of Premises broadly compliant as a % = 75%.
7	To carry out up to 200 follow-up visits, focusing on zero - 2 star premises.	Number of follow-up visits carried out. = 160
8	To improve the 6 rated zero premises.	Number of zero rated premises which have improved their rating =6.
9	To improve 30 of the 60 1 rated premises.	No. 1 rated premises which have improved their rating = 41
10	To serve improvement notices on all non-compliant businesses where informal action has been unsuccessful.	Number of notices served on non-compliant businesses = 43
11	To prosecute / offer simple cautions to all non-compliant food business operators where other actions have been unsuccessful.	Number of prosecutions/simple cautions against no of non-compliant businesses = 1 prosecution and 8 simple cautions administered.
12	To assess newly registered unrated business by sending a questionnaire	No. of questionnaires sent = 128 no to newly registered businesses.

<b>8.2</b>	<b>Food Complaints /Service Requests</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To respond to up to 300 complaints/enquiries about food and food premises within 5 working days.	425 received complaints/enquires received and 92% responded to within 5 working days.
<b>8.3</b>	<b>Home Authority Principle/ Primary Authority Partnerships</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To use Primary Authority Inspections forms where appropriate and refer to the Primary Authority to resolve issues found during inspection.	No performance measure
2	To refer to Primary Authorities when dealing with food complaints about food manufactured outside the Borough.	No performance measure
<b>8.4</b>	<b>Advice to Food Businesses</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To continue to provide advice to business during inspections.	Advice given at every inspection = 100%
<b>8.5</b>	<b>Food Inspection and Sampling</b>	
	<b>OBJECTIVES</b>	
1	To participate in South East London Food Liaison Group, London Food Coordinating Group (FLCG), Food Standards Agency (FSA) and Public Health England (PHE) and EU sampling programmes for both analysis and examination. .	Number of food samples analysed or examined = 54
2	To carry out intelligence-led local sampling projects as a result of inspections, complaints or other information	
<b>8.6</b>	<b>Control and Investigations of Outbreaks and Food Related Infectious Disease</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To investigate cases of food poisoning or suspected food poisoning connected with premises within the Bromley, in line with South East London Health Protection Team guidelines	405 cases reported against Number investigated = 100%
2	To investigate outbreaks of food poisoning/suspected food poisoning/viral gastroenteritis.	3 Food poisoning outbreaks reported against Number investigated = 100%
<b>8.7</b>	<b>Food Safety Incidents</b>	

	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To respond to all food alerts and other food safety incidents issued by the FSA, as appropriate.	Number of food alerts/incidents = 4 =100% of applicable alerts
<b>8.8</b>	<b>Liaison with Other Organisations</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To ensure the food service liaises with and participates in joint initiatives with other Council Departments, organisations and Borough as required.	Attendance at the South East London Food Liaison Group, Environmental Health Working Group and Public Health Group
2	To send representatives to the South East London Food Liaison Group, Environmental Health Working Group and Public Health Group	Attend 6 meetings
<b>8.9</b>	<b>Food Safety and Standards Promotion</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To update the food service's website.	Evaluated by the Website Coordinator.
2	To publicise food hygiene myths during Food Safety Week	Prepare press release
3	To continue to participate in the FSAs FHRS scheme	No performance measure.
<b>8.10</b>	<b>Health and Safety in Food Premises</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To carry out up to health and safety "hazard spotting" in food premises where significant offences are noted.	30 health and safety "hazard spotting" inspections carried out
2	To liaise with the Health and Safety Team where formal action in food premises is required.	No performance measure.

**Appendix C SUMMARY OF STAFF RESOURCES REQUIRED FOR FOOD SERVICE for 2019-20**

<b>SERVICE DELIVERY</b>	<b>FULL TIME EQUIVALENT OFFICERS - REQUIRED TO UNDERTAKE 2019/20 WORK PLAN (IF NO ENFORCEMENT WORK IS UNDERTAKEN)</b>	<b>FULL TIME EQUIVALENT OFFICERS - TO CARRY OUT ALL UNRATED INSPECTIONS) (IF NO ENFORCEMENT WORK IS UNDERTAKEN)</b>
Food Premises Inspections	• 7*FSO	• 1.0 *FSO (contractor)
Food Complaints	• 0.6FSO	• 0.0 FSO
Home Authority Advice	• 0.0 (No longer offered directly)	• 0.0 (No longer offered directly)
Advice to Businesses	• 0.0 (No longer offered directly)	• 0.0 (No longer offered directly)
Advice to Consumers	• 0.0 (No longer offered directly)	• 0.0 (No longer offered directly )
Food Sampling	• 0.40 FSO	• 0.0 FSO
Control and Investigation of Outbreaks and Food Related Infectious Disease	• 0.30 FSO	• 0.0 FSO
Food Safety Incidents	• 0.03FSO*/LO	• 0.0FSO
Liaison - with the South East London Sector food liaison & Environmental Health Working Groups	• 0.01 LO	• 0.0 LO
Food Safety and Standards Promotion	• 0.00 FSO (No longer offered directly)	• 0.0 FSO
Health and Safety in Food Premises	• 0.20 FSO	• 0.0 FSO
Staff Training and Development	• 0.20 FSO/LO	• 0.0 FSO
FOIs and FHRS appeals and right of reply	• 02 FSO/LO	• 0.0 FSO/LO
Quality Assessment	• 0.10 LO	• 0.0 LO
Administration	• 0.50 AO	• 0.0
<b>TOTAL STAFF RESOURCE REQUIRED</b>	• <b>9.64</b>	• <b>1.00</b>
<b>TOTAL RESOURCE PROVIDED</b>	• <b>9.64</b>	• <b>0.00</b>

\*FSO = Food Safety Officer LO = Lead Officer AO= Admin officer

This page is left intentionally blank

Report No.  
ES19050

London Borough of Bromley

PART ONE - PUBLIC

---

**Decision Maker:** ENVIRONMENT PDS COMMITTEE AND  
PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE

**Date:** 28 August 2019 and  
10 September 2019

**Decision Type:** Non-Urgent Non-Executive Non-Key

**Title:** RISK REGISTER

**Contact Officer:** Sarah Foster, Head of Performance Management and Business Support  
Tel: 020 8313 4023 Email: sarah.foster@Bromley.gov.uk

**Chief Officer:** Colin Brand, Director of Environment & Public Protection

**Ward:** All Wards

---

1. Reason for report

- 1.1 This report presents the revised E&CS Risk Register for detailed scrutiny by both PDS Committees.
- 1.2 This appended Risk Register also forms part of the Annual Governance Statement evidence-base and has been reviewed by: E&CS DMT, Corporate Risk Management Group; and Audit Sub-Committee.
- 

2. **RECOMMENDATIONS**

**That the Environment and Community Services PDS Committee and Public Protection and Enforcement PDS Committee reviews and comments on the appended E&CS Risk Register.**

### Impact on Vulnerable Adults and Children

1. Summary of Impact: The appended Risk Register covers services provided by E&CS Department and some borough-wide risks. Addressing the impact of service provision on vulnerable adults and children is a matter for the relevant procurement strategies, contracts and service delivery rather than this high-level Risk Register report.
- 

### Corporate Policy

1. Policy Status: Existing Policy:
  2. BBB Priority: Excellent Council:
- 

### Financial

1. Cost of proposal: N/A
  2. Ongoing costs: N/A
  3. Budget head/performance centre: E&CS and PP&E Portfolios
  4. Total current budget for this head: £31.2m and £2.6m
  5. Source of funding: Existing revenue budget 2019/20
- 

### Personnel

1. Number of staff (current and additional): - 146.7 FTEs and 51.9 FTEs
  2. If from existing staff resources, number of staff hours: - N/A
- 

### Legal

1. Legal Requirement: Statutory Requirement:
  2. Call-in: Not Applicable:
- 

### Procurement

1. Summary of Procurement Implications: Risk management contributes to contract management and good governance.
- 

### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
- 

### Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A
2. Summary of Ward Councillors comments: N/A

### 3. COMMENTARY

#### Risk Register Background

- 3.1 The Council's aims are set out in [Building a Better Bromley](#) and the Portfolio Plans, and a risk can be defined as anything which could negatively affect the associated outcomes. Some level of risk will be associated with any service provision: the question is how best to manage that risk down to an acceptable level? (this is known as our 'risk appetite')
- 3.2 It follows that the Council should be able to clearly and regularly detail the main departmental risks and related mitigation measures to ensure a) that desired outcomes are achieved and b) to allow for Member scrutiny – the purpose of this report.
- 3.3 Although the appended E&CS Risk Register is comprehensive, departmental risk management activity is certainly not exclusive to this report. For instance:
- major programmes and services (e.g. Tree Management Strategy) will have associated Risk Registers (such registers are reviewed by the relevant Programme / Service Boards);
  - financial risk is addressed in each Portfolio's Budget Monitoring Reports and, more generally, in the Council's Annual Financial Strategy Report;
  - audit risk is captured through the Audit Programme's planned and investigative activity and associated reports and management action requirements;
  - contract risk forms part of the Contracts Database (all contracts are now quantified and ranked according to the risk presented to the Council). The new Environmental Services Contract, therefore, appears both in this Risk Register and the Corporate Contracts Register, due to its size and complexity. The Contracts Register for the Environment Portfolio is appended to Report ES19049 (also on this agenda).
- 3.4 In 2016/17 Zurich Municipal (the Council's insurer) undertook a 'check and challenge' review (involving all management teams) of the Council's general approach and the individual risks. This resulted a new-style of register and a greater consistency of approach across the Council. Zurich attended during 2018/19 to repeat this exercise with all E&CS risk owners.
- 3.5 It was agreed that Risk Registers should be presented to each Departmental Management Team, the relevant PDS committee, and Audit Sub-Committee twice a year (minimum) to allow activity to be scrutinised in a regular and systematic manner. Individual risks should naturally be reviewed (by Risk Owners) at a frequency proportionate to the risk presented (see appendix).
- 3.6 In addition to its use for management and reporting purposes, the Risk Register also forms part of E&CS's evidence-base for contributing to the Council's Annual Governance Statement (which, itself, forms part of the Council's end-of-year management procedures).
- 3.7 Risks from all three departments are considered at the (officer) Corporate Risk Management Group (CRMG), which reviewed all the Risk Registers when it last met on 1 May 2019 (next meeting 11<sup>th</sup> September 2019).
- 3.8 The Risk Registers were reviewed by Audit Sub-Committee (4 June 2019), but detailed scrutiny of individual registers is the responsibility of each PDS committee (hence this report).
- 3.9 At the time of writing, the Council has 101 individual risks plus 11, high-level, Corporate Risks (covering key risks which apply to the Council as a whole).
- 3.10 E&CS Department currently has 25 risks (~25% of the Council's total).

3.11 The appended E&CS Risk Register is summarised below. Each risk is scored using a combination of the 'likelihood' (definite to remote) and 'impact' (insignificant to catastrophic) to produce a 'gross rating' (prior to controls) and 'net rating' (post management controls) – see Appendix. No E&CS risks are currently ragged 'red' following implementation of management control measures.

Ref	Risk & Description	Gross Risk Rating	Net Risk Rating
1	<b>Emergency Response:</b> Failure to respond effectively to a major emergency / incident internally or externally	8	6
2	<b>Central Depot Access:</b> Major incident resulting in loss of / reduced Depot access affecting service provision (LBB's main vehicle depot)	6	3
3	<b>Fuel Availability:</b> Fuel shortage impacting on transport fleet / service delivery	5	4
4	<b>Business Continuity Arrangements:</b> Lack of up-to-date, tried and tested, BCP for all Council services	8	8
5	<b>Industrial Action:</b> Contractors' staff work-to-rule / take strike action impacting on service delivery	12	12
6	<b>Health &amp; Safety (E&amp;CS):</b> Ineffective management, processes and systems within E&CS departmentally	12	8
7	<b>Environmental Services Contract (Mobilisation):</b> Failure to effectively mobilise new Environmental Services contracts	12	8
8	<b>Highways Management:</b> Deterioration of the Highway Network due to under-investment	8	6
9	<b>Arboricultural Management:</b> Failure to inspect and maintain Bromley's tree stock leading to insurance claims etc	12	12
10	<b>Income Variation:</b> Loss of income at a time when the Council is looking to grow income to off-set reduced funding	6	6
11	<b>Waste Budget:</b> Increasing waste tonnages resulting in increased waste management costs	12	6
12	<b>Food Standards Agency Audit:</b> Failure to meet required service standards as required by Food Standards Agency Audit (April 2017)	12	12
13	<b>Town Centre Businesses:</b> Loss of town centre businesses to competition	12	6
14	<b>New Parking Schemes:</b> Failure to deliver new parking schemes resulting in income loss and congestion	12	4
15	<b>Staff Resourcing and Capability:</b> Loss of corporate memory and ability to deliver as key staff leave (good new staff are at a premium)	12	12
16	<b>Climate Change:</b> Failure to adapt the borough and Council services to our changing climate	9	6
17	<b>Mortuary Contract</b> Failure to procure tendered services to budget	16	12
18	<b>CCTV Contract (Mobilisation)</b> Failure to effectively mobilise the new CCTV contracts	6	3
19	<b>Income Reconciliation (Public Protection Licensing)</b> Uncertainty around income reconciliation when the Council is looking to grow income to offset reduced funding	6	6
20	<b>Income Reconciliation (Waste Management)</b> Uncertainty around income reconciliation linked to the mobilisation of new waste contracts	6	2
21	<b>Bromley Town Centre Market Reorganisation</b> Failure to deliver a successful market reorganisation which meets the needs of traders, businesses and customers	9	6

22	<b>Dogs and Pests Contract</b> Failure to deliver the contract to the required service levels	6	4
23	<b>Out of Hours Noise Service</b> Failure to deliver statutory services	12	12
24	<b>Integrated Offender Management</b> Failure to contribute to IOM in Bromley	12	12
25	<b>Anti-Social Behavior Co-Ordinator post:</b> Failure to deliver ASB problem solving and partnership activity	12	12

- 3.12 The risks (including causes and effects) are described in more detail in the appended Risk Register. Each risk is assigned a category (Compliance & Regulation, Finance, Service Delivery, Reputation and Health & Safety) and scored – using a combination of the ‘likelihood’ and ‘impact’ both being assessed on a scale of 1-5 – to produce a gross risk score.
- 3.13 Current controls designed to mitigate the risk are also listed and these, in turn, generally result in a (lower) net risk score. Finally, additional actions are listed for the Risk Owner to consider to further reduce the level of risk (commensurate with their risk appetite). Risk Ownership will be adjusted at the next review of the register, in light of changes to the LBB Corporate Leadership Team structure.

#### **4. IMPACT ON VULNERABLE ADULTS & CHILDREN**

- 4.1 The appended Risk Register covers environmental services, which tend to be universal in nature, rather than being specifically directed towards vulnerable adults and children.

#### **5. POLICY IMPLICATIONS**

- 5.1 The Council’s renewed policy ambition for the borough is set out in [Building a Better Bromley](#) and the various Portfolio Plans. Risk Registers help to deliver these policy aims by identifying issues which could impact on ‘ensuring good contract management to ensure value-for-money and quality services’ and putting in place mitigation measures to reduce risk and help deliver the policy aims and objectives.

#### **6. PROCUREMENT IMPLICATIONS**

- 6.1 Contract and hence procurement risk is mainly captured in the Contracts Database and Contracts Register Report rather than this Risk Register Report. That said, progress with mobilising the new Environmental Services Contract is captured in the appended register due to the contract’s strategic importance.

#### **7. FINANCIAL IMPLICATIONS**

- 7.1 There are no direct financial implications arising from this report, however the Risk Register does identify areas that could have financial risks.

#### **8. PERSONNEL IMPLICATIONS**

- 8.1 There are no direct personnel implications but the Risk Register does identify service areas where recruitment and capacity present challenges (e.g. 19: Staff Recruitment & Retention).

## 9. LEGAL IMPLICATIONS

- 9.1 There are no direct legal implications but the Risk Register does identify some regulatory and legal issues: e.g. the Food Standards Agency Audit, compliance with Health & Safety law, and Industrial Action.

<b>Non-Applicable Sections:</b>	None
Background Documents: (Access via Contact Officer)	None

## RISK REGISTER REPORT (ES18037): RISK ASSESSMENT GUIDANCE SUMMARY

<b>LIKELIHOOD</b>	Almost Certain (5)	5	10	15	20	25	15+	<b>High Risk:</b> review controls/actions every month	
	Highly Likely (4)	4	8	12	16	20	10 - 12	<b>Significant Risk:</b> review controls/actions every 3 mths	
	Likely (3)	3	6	9	12	15	5 - 9	<b>Medium Risk:</b> review controls/actions every 6 months	
	Unlikely (2)	2	4	6	8	10	1 - 4	<b>Low Risk:</b> review controls/actions at least annually	
	Remote (1)	1	2	3	4	5			
	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)				
	<b>IMPACT</b>								

LIKELIHOOD KEY					
	Remote (1)	Unlikely (2)	Possible (3)	Likely (4)	Definite (5)
<b>Expected frequency</b>	10-yearly	3-yearly	Annually	Quarterly	Monthly

IMPACT KEY					
Risk Impact	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
<b>Compliance &amp; Regulation</b>	<ul style="list-style-type: none"> <li>Minor breach of internal regulations (not reportable)</li> </ul>	<ul style="list-style-type: none"> <li>Minor breach of external regulation (not reportable)</li> </ul>	<ul style="list-style-type: none"> <li>Breach of internal regulations leading to disciplinary action</li> <li>Breach of external regulations, reportable</li> </ul>	<ul style="list-style-type: none"> <li>Significant breach of external regulations leading to intervention or sanctions</li> </ul>	<ul style="list-style-type: none"> <li>Major breach leading to suspension or discontinuation of business and services</li> </ul>
<b>Financial</b>	<ul style="list-style-type: none"> <li>&lt;£50,000</li> </ul>	<ul style="list-style-type: none"> <li>&gt; £50,000 &lt;£100,000</li> </ul>	<ul style="list-style-type: none"> <li>&gt;£100,000 &lt;£1,000,000</li> </ul>	<ul style="list-style-type: none"> <li>&gt;£1,000,000 &lt;£5,000,000</li> </ul>	<ul style="list-style-type: none"> <li>&gt;£5,000,000</li> </ul>
<b>Service Delivery</b>	<ul style="list-style-type: none"> <li>Disruption to one service for a period &lt;1 week</li> </ul>	<ul style="list-style-type: none"> <li>Disruption to one service for a period of 2 weeks</li> </ul>	<ul style="list-style-type: none"> <li>Loss of one service for between 2-4 weeks</li> </ul>	<ul style="list-style-type: none"> <li>Loss of one or more services for a period of 1 month or more</li> </ul>	<ul style="list-style-type: none"> <li>Permanent cessation of service(s)</li> </ul>
<b>Reputation</b>	<ul style="list-style-type: none"> <li>Complaints from individuals / small groups of residents</li> <li>Low local coverage</li> </ul>	<ul style="list-style-type: none"> <li>Complaints from local stakeholders</li> <li>Adverse local media coverage</li> </ul>	<ul style="list-style-type: none"> <li>Broader based general dissatisfaction with the running of the Council</li> <li>Adverse national media coverage</li> </ul>	<ul style="list-style-type: none"> <li>Significant adverse national media coverage</li> <li>Resignation of Director(s)</li> </ul>	<ul style="list-style-type: none"> <li>Persistent adverse national media coverage</li> <li>Resignation / removal of CEX / elected Member</li> </ul>
<b>Health &amp; Safety</b>	<ul style="list-style-type: none"> <li>Minor incident resulting in little harm</li> </ul>	<ul style="list-style-type: none"> <li>Minor injury to Council employee or someone in the Council's care</li> </ul>	<ul style="list-style-type: none"> <li>Serious injury to Council employee or someone in the Council's care</li> </ul>	<ul style="list-style-type: none"> <li>Fatality to Council employee or someone in the Council's care</li> </ul>	<ul style="list-style-type: none"> <li>Multiple fatalities to Council employees or individuals in the Council's care</li> </ul>

This page is left intentionally blank

## Environment & Community Services (ECS) Risk Register

													DATE LAST REVIEWED:	09/08/2019
No.	ECS RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK			FURTHER ACTION REQUIRED	RISK OWNER
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
1	1	All ECS	<b>Emergency Response</b> Failure to respond effectively to a major emergency / incident internally or externally	<b>Cause(s):</b> - Emergency may be triggered by storms, floods, snow, extreme heat or other emergency. Ineffective response could be caused by capacity and/or organisational issues  <b>Effect(s):</b> - Failure to fulfil statutory duties in timely manner - Disruption to infrastructure and service provision in general	Service Delivery	2	4	8	1. Corporate Major Emergency Response Plan 2. E&CS Incident Plan (held by Emergency Planning) 3. Service Business Continuity Plans 4. Out-of-Hours Emergency Service 5. Winter Service Policy and Plan (reviewed annually) 6. Training, Testing and Exercising (includes training provided as part of a new Corporate Business Continuity Group formed in June 2018) 7. Multi-agency assessment of emergency risks 8. 2019 Training Programme in place for volunteers to be trained to run the Borough Emergency Control Centre (BECC)	2	3	6	1. Continuation of the Corporate Business Continuity Group 2. Development of risk-specific arrangements in accordance with Minimum Standards for London and informed by the Borough Risk Assessment 3. Implement 'on-call rota' for Emergency Response Manager 4. Recruit and train more Emergency Response Volunteers 5. Undertake Safer Cities Exercise (May 2019)	David Tait
2	2	All ECS	<b>Central Depot Access</b> Major incident resulting in loss of/reduced Depot access affecting service provision (LBB's main vehicle depot)	<b>Cause(s):</b> - Fire, explosion, train derailment, strike etc.  <b>Effect(s):</b> - Significant service disruption (Waste, Street Cleaning, Gritting, Fleet Management, Streetscene & Greenspace service management etc.)	Service Delivery	2	3	6	1. Contingency plans for: - Alternative vehicle parking - Temporary relocation of staff - Storage of bulky materials 2. Implement Business Continuity Plans 3. Close liaison with other Depot users (e.g. Waste Contract, Street Cleaning) and Highways Winter Service Team 4. 'Central Depot Users Group' (Health & Safety forum for all site users) 5. Work Place Risk Assessments in place	1	3	3	1. Consideration of issue as part of the Environmental Services Contracts commencing in 2019, through involvement of new Service Providers in the Central Depot User Group and liaison with colleagues in Property regarding future development of the site.	Paul Chilton
3	3	All ECS	<b>Fuel Availability</b> Fuel shortage impacting on both LBB and service provider transport fleet	<b>Cause(s):</b> - National or local fuel shortage caused by picketing or other external factors  <b>Effect(s):</b> - Failure to provide services impacting on residents and other customers	Service Delivery	1	5	5	1. Identified alternative fuel supplies at contractors and neighbouring boroughs (corporate Fuel Disruption Plans based on National Plan are held by the Emergency Planning Team) 2. Designated Filling Station identified under National Emergency Plan by London Resilience Team as designated fuel supply for LBB logoed vehicles 3. Fuel store at Central Depot 4. Ongoing liaison with other London Boroughs concerning collaboration and assistance	1	4	4	1. Continue to monitor service provider arrangements for ensuring adequate fuel supply.	Peter McCready
4	4	All ECS	<b>Business Continuity Arrangements</b> Lack of up-to-date, tried and tested, BCP for all Council services	<b>Cause(s):</b> - Failure to implement and keep up-to-date effective service and corporate Business Continuity Plans  <b>Effect(s):</b> - Non-provision of critical services following an incident (internal or external)	Service Delivery	2	4	8	1. Corporate Risk Management Group now encompasses Business Continuity 2. Corporate Business Continuity Group established in June 2018 with representation from ECS 3. Undertaking Business Impact Analyses of all services to identify priorities 4. Developing a Corporate Business Continuity Plan and updating service BCPs 5. Emergency Planning Training Exercises (March 2018 and May 2019) with involvement across all of ECS	2	4	8	1. Continue to conduct training exercises to ensure that BCPs for each service area work in real life. ICT system failure has been identified as the largest risk and is outside the control of ECS	David Tait
5	6	All ECS	<b>Industrial Action</b> Contractors' staff work-to-rule / take strike action impacting on service delivery	<b>Cause(s):</b> - Union dissatisfaction over pay and conditions (particularly in Waste, Libraries)  <b>Effect(s):</b> - Temporary disruption to service / reduced customer satisfaction	Service Delivery	3	4	12	1. Ongoing monitoring / meetings regarding workforce issues 2. Joint development of Business Contingency Plans with Service Providers	3	4	12	1. Review public communications to be used in the event of a strike 2. Staff training and engagement built into the mobilisation strategy for the new Environmental Services contracts and incorporated into communications with Library staff.	Nigel Davies
6	8	All ECS	<b>Health &amp; Safety (E&amp;CS)</b> Ineffective management, processes and systems within E&CS departmentally	<b>Cause(s):</b> - Failure to take departmental action to reduce likelihood of accidents, incidents and other H&S issues  <b>Effect(s):</b> - HSE investigation / prosecution leading to fines, increased insurance claims, and reputational damage	Health & Safety	3	4	12	1. Workplace Risk Assessments (including lone and home working) 2. Accident & Incident Reporting system (AR3 & Riddor) 3. Contractor Inspection electronic Reporting system 4. Interface with Corporate Risk Management Group 5. Annual audits and annual paths surveys (Parks) 6. Cyclical 5-year survey of park trees and highway trees 7. Regular Footway inspections 8. ECS Health and Safety Committee meets regularly to review departmental Health and Safety arrangements	2	4	8	1. Ensure Workplace Risk Assessments (inc. Homeworking) updated annually and biennial reviews conducted 2. Encourage reporting of all significant accidents and incidents using AR3 form (and reporting of RIDDOR incidents) 3. Review and update list of responsible persons for fire safety purposes at all ECS buildings and ensure the necessary communication and training is provided. 4. Ensure resource exists to discharge statutory functions	Sarah Foster

## Environment & Community Services (ECS) Risk Register

													DATE LAST REVIEWED:		09/08/2019
No.	ECS RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK			FURTHER ACTION REQUIRED	RISK OWNER	
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING			
7	11	Streetscene and Greenspace	<b>Environmental Services Contract (Mobilisation)</b> Failure to effectively mobilise the new Environmental Services Contracts	<b>Cause(s):</b> - Unfamiliarity with new contract model (client & contractors) - Lack of client capacity to progress mobilisation - Lack of supplier capacity to progress mobilisation - Significant service change requiring service-user consultation - Lack of preparation of contract transition (exit and mobilisation) plans  <b>Effect(s):</b> - Reputational damage - Costs incurred as a result of additional last minute resources required to deliver services - Failure to deliver service to requirements / KPIs / expectations	Service Delivery, Financial & Reputational	3	4	12	1. Regular Project Planning meetings are held to discuss contract transition 2. Transition Plans developed and continually reviewed through regular contract meetings	2	4	8	1. Formal meetings with agreed Terms of Reference according to contract schedules have been established with service providers to mobilise contracts. Following contract commencement in April 2019, progress with mobilisation is being monitored closely by Contract Managers and any issues for resolution are being captured by the Mobilisation Team.	Peter McCreedy	
8	12	Highways	<b>Highways Management</b> Deterioration of the Highway Network due to under-investment	<b>Cause(s):</b> - Failure to manage Highways in respect of traffic volumes, winter weather, financial resources leading to deteriorating condition  <b>Effect(s):</b> - Leading to increased maintenance costs, insurance claims (trips, falls and RTAs) and reputational damage	Financial	2	4	8	1. Strategy to mitigate insurance claims 2. Inspection regime and defined intervention levels for maintenance repairs and monitoring 10% of works for compliance 3. Winter Maintenance procedures (gritting / salting) 4. Increased salt storage capacity 5. Improved customer expectation management 6. Asset management technique (e.g. Highway Asset Management Plan) 7. New capital programme to reduce reactive works 8. Performance Management measures incorporated into new Highways contract from July 2018	3	2	6	1. Review frequency of Highways Inspections and adjust as deemed appropriate to effectively manage the risk in line with revised Code of Practice (published 2016) 2. Additional inspections carried out and repairs undertaken as necessary 3. Modernisation of contractor's programming and completion of maintenance repairs involving remote working ICT technology	Garry Warner	
9	13	Streetscene and Greenspace	<b>Arboricultural Management</b> Failure to inspect and maintain Bromley's tree stock leading to insurance claims etc.	<b>Cause(s):</b> - Failure to ensure that trees are managed as safely as reasonably practicable  <b>Effect(s):</b> - Leading to blocked highways, reputational damage and financial liabilities	Financial	4	3	12	1. Tree care and safety contract in place (new contract commenced April 2019) 2. Full asset Survey of ~30% of street and park trees (and 50% of school trees) 3. Risk trees identified and registered increased inspection frequency using asset management database (Confirm) 4. Implement remedial works to address risk associated defects 5. Review Tree Risk Management Strategy (annually). 6. Review the 'Storm Strategy' annually to be able to respond quickly and call in additional staff, equipment and contractors 7. Provide a cyclical safety survey and remedial works schedule commensurate to budget availability and potential prioritisation	4	3	12	1. Staffing levels are not satisfactory within the Arboriculture team, therefore existing risk controls alone are not sufficient. An apprenticeship opportunity is being investigated with HR, given that suitable staff could not be identified through the standard recruitment process to fill vacant tree officer posts.	Peter McCreedy	
10	14	All ECS	<b>Income Variation (Highways and Parking)</b> Loss of income when the Council is looking to grow income to offset reduced funding	<b>Cause(s):</b> - Improved Street Works performance by utility companies (reduced fines) - Under-achievement of expected car parking income and parking enforcement, due to resistance to price increases and reduced incidents - Loss of income from Penalty Charge Notices for Bus Lane Enforcement activity - Reduction in Street Enforcement activity (Fixed Penalty Notices) - Failure of APCOA (new Parking contractor) to provide contracted services (e.g. strikes)  <b>Effect(s):</b> - Loss of income with potential to reduce service delivery funds	Financial	3	2	6	1. Regular income monitoring and review of parking tariff structures, including benchmarking Parking charges against other authorities and local private sector competitors 2. Monitoring contractor performance (e.g. only issue good quality PCNs) 3. Good debt recovery systems 4. Monitoring parking use and avoid excessive charge increases 5. Provide attractive, safe clean car parks 6. Regular contractor meetings 7. Monitoring of parking enforcement activity through new Performance Indicators reported to PDS Committees (E&CS, PP&E)	3	2	6	1. Refine procedure for resolving disputes with utilities review of parking tariff structures 2. Monitor income trends 3. Continue to monitor success in achieving enforcement objectives 4. Intelligence-led targeting of hotspots for enforcement	Nigel Davies	

## Environment & Community Services (ECS) Risk Register

													DATE LAST REVIEWED:	09/08/2019
No.	ECS RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK			FURTHER ACTION REQUIRED	RISK OWNER
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
11	15	Streetscene and Greenspace	<b>Waste Budget</b> Increasing waste tonnages resulting in increased waste management costs	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to anticipate/manage waste management financial/cost pressures due to increasing landfill tax, increasing property numbers, declining recycling income (lower paper tonnages) and limited incineration capacity</li> <li>- Failure to achieve contract payment mechanism targets for the proportion of waste sent to landfill/incineration/recycling/composting (this cause will be redundant as of April 2019)</li> <li>- Waste tonnage growing faster than budgeted or operational factors (i.e. adverse weather conditions, etc.)</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Budgets being exceeded and potential knock-on impact on other Council services</li> </ul>	Financial	3	4	12	<ol style="list-style-type: none"> <li>1. Cost pressures recognised in Council's Financial Strategy</li> <li>2. Landfill tonnages falling - offsets any tax increase</li> <li>3. Continued focus on promoting waste minimisation and recycling (e.g. in Environment Matters and through targeted campaigns such as Food Waste doorstep)</li> <li>- Monthly monitoring of recycled tonnages and projection to yearly figures</li> <li>- Regular and sustained recycling awareness campaign</li> <li>- Consolidation of Compositing for All campaign</li> <li>- Continuing investigation of waste minimisation and recycling initiatives</li> <li>- Monthly monitoring of all waste tonnages and projection to yearly figures</li> <li>- Monthly monitoring of all collection costs and figures</li> <li>- Ongoing analysis of collection and disposal methodology</li> <li>4. Consideration of alternative disposal routes e.g. increased use of Veolia's Mechanical Biological Treatment (MBT) plant</li> <li>5. Reviewing and benchmarking operational costs to identify options</li> <li>6. Achieving best value tenders under new contract - contract commencement April 2019</li> </ol>	2	3	6	1. The new waste contract commenced in April 2019 and this risk will be reviewed during the mobilisation period to determine whether any additional action is required.	Peter McCready
12	17	Public Protection	<b>Food Standards Agency Audit</b> Failure to meet required service standards as required by Food Standards Agency Audit (April 2017)	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of resource to meet Code of Practice service standards. Staff are not staying with Bromley due to other authorities providing more attractive employment opportunities.</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Leading to reputational damage and possible use of Power of Direction</li> </ul>	Health & Safety	4	3	12	<p>Following a meeting with the FSA (September 2018), they accepted the issues the Team has in recruiting Officers with the prerequisite qualifications necessary to carry out the spectrum of work. In response, they advised the Team to:</p> <ol style="list-style-type: none"> <li>a. Focus on completing due A-D inspections</li> <li>b. Focus on completing overdue C-D inspections</li> <li>c. This authorisation to shift focus has necessitated a new work programme designed to achieve the desired outcome which has now been developed by the Lead Practitioner.</li> </ol> <ol style="list-style-type: none"> <li>1. The new work programme has been implemented, and focus was given to completing due A-D inspections and overdue C-D inspections.</li> <li>2. There are still issues with recruitment as a FTE officer has resigned, and an agency officer left with no notice. Still a need to recruit to 1.4 X FTE food safety officers to address the vacancies.</li> </ol> <p>FSA confirmed they were pleased with progress (26/10/18), as the new focus has reduced the overdue inspections considerably. They are following up in 3 months, and anticipate signing off the audit in 6 months if progress is maintained. It should be noted that at the March 2019 monthly performance review for this service, all Performance Indicators were reported as Green (on track).</p>	4	3	12	<ol style="list-style-type: none"> <li>1. Establish a process whereby recruitment to Bromley is encouraged and staff are provided with an incentive to remain.</li> <li>2. Build resilience into food safety team.</li> </ol>	Joanne Stowell
13	18	All ECS	<b>Town Centre Businesses</b> Loss of town centre businesses to competition	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to redevelop high streets coupled with competition from out-of-town developments and online shopping</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Reduction in high street business and market stall occupancy</li> <li>Loss of income (Business rates and market stalls)</li> <li>Poor public perception and negative publicity</li> </ul>	Financial	3	4	12	<ol style="list-style-type: none"> <li>1. BID Teams organise town centres events</li> <li>2. Investment in Orpington High Street and Bromley North (done)</li> <li>3. Regular advertising/promotion of markets and availability of stalls</li> <li>4. Review of Market operational costs to reduce costs where possible (a Commissioning exercise is underway as at December 2018 for the markets service)</li> <li>5. Regular maintenance and renewal of market infrastructure - recent market relocation project has been undertaken.</li> </ol>	2	3	6	<ol style="list-style-type: none"> <li>1. Ongoing review of market provision linked to outsourcing service provision to Bromley Business Improvement District</li> <li>2. Detailed annual action plan to be drawn up for each town centre</li> </ol>	Colin Brand
14	19	Traffic and Parking	<b>New Parking Schemes</b> Failure to deliver new Parking schemes resulting in income loss and congestion	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>Increasing demand from residents for parking schemes coupled with decreasing grant funding from TfL</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Increased congestion and reduced income</li> </ul>	Service Delivery	3	4	12	<ol style="list-style-type: none"> <li>1. Setup register of agreed schemes with designated officers and timescales</li> <li>2. Develop and agree financial appraisal framework with finance department</li> <li>3. Software procured (2013/14) to help improve project and programme management</li> </ol>	2	2	4	1. Consideration to be given to better balancing the cost of scheme design against parking charges	Angus Culverwell

## Environment & Community Services (ECS) Risk Register

													DATE LAST REVIEWED:	09/08/2019
No.	ECS RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK			FURTHER ACTION REQUIRED	RISK OWNER
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
15	20	All ECS	<b>Staff Resourcing and Capability</b> Loss of corporate memory and ability to deliver as key staff leave (good new staff are at a premium)	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>-Availability of suitably qualified / experienced staff to replace retirees and leavers. Particular problem within Planning, Environmental Health and Traffic professionals (TIL offers better remuneration and career progression). Lack of incentive for good staff to remain at LBB.</li> </ul> <p><b>Effect (s):</b></p> <ul style="list-style-type: none"> <li>-Loss of organisational memory, greater reliance on contracted staff, delays in delivering services / plans (e.g. Transport Local Implementation Plan, FSA Audit plan). Inability to effectively manage contracts as Contract Managers may have started out in a different role (i.e. as Service Managers) and do not have the necessary expertise to do so (i.e. auditing).</li> </ul>	Service Delivery	3	4	12	1. Ongoing programme to find and retain quality staff through internal schemes such as career grades and ongoing CPD	4	3	12	1. Consider potential for contractors to supply necessary skills 2. Review options with HR for incentivisation schemes to ensure staff recruitment and retention is high 3. Existing controls are not currently sufficient to maintain the staff quota within the Arboriculture team. Explore apprenticeship scheme as a possibility to ensure this team can maintain deliverables of the service in terms of client inspections and reporting.	Nigel Davies
16	22	All ECS	<b>Climate Change</b> Failure to adapt the borough and Council services to our changing climate	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Severe weather events including extreme heat, storms, floods etc.</li> </ul> <p><b>Effect (s):</b></p> <ul style="list-style-type: none"> <li>- Resulting in threats to service provision, environmental quality and residents' health</li> </ul>	Service Delivery	3	3	9	1. Adopt best adaptation practice as identified through London Climate Change Partnership, UK Climate Impacts Programme, and the Local Adaptation Advisory Panel 2. Implementation of LBB's Carbon Management Programme 3. LBB Surface Water Management Plan and Draft Local Flood Risk Strategy	2	3	6	1. Emergency Planning to liaise with Public Health on cross-cutting issues e.g. excess summer deaths and vector-borne disease etc.	Sarah Foster
17	23	Public Protection	<b>Mortuary Contract</b> Failure to procure tendered services to budget	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of interest from potential bidders</li> <li>- Tendered costs being higher than budget/forecast</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Risk of challenge</li> <li>- Reputational damage</li> <li>- Failure to achieve best value</li> <li>- Lack of competition / bids</li> <li>- Failure to deliver service to requirements / KPIs / expectations</li> </ul>	Financial & Service Delivery	4	4	16	1. Existing contract extended whilst negotiations are underway	3	4	12	1. Negotiations are almost complete and it is anticipated that the associated award reports will be presented to PDS and the Executive in September 19.	Joanne Stowell
18	24	Public Protection	<b>CCTV Contract (Mobilisation)</b> Failure to effectively mobilise the new CCTV contracts	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Unfamiliarity with new contract model (client &amp; contractors)</li> <li>- Lack of client capacity to progress mobilisation</li> <li>- Lack of supplier capacity to progress mobilisation</li> <li>- Significant service change requiring service-user consultation</li> <li>- Lack of preparation of contract transition (exit and mobilisation) plans</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Reputational damage</li> <li>- Costs incurred as a result of additional last minute resources required to deliver services</li> <li>- Failure to deliver service to requirements / KPIs / expectations</li> </ul>	Service Delivery, Financial & Reputational	2	3	6	1. Regular Contract meetings are held to discuss and monitor contract mobilisation	1	3	3	1. Continued review of contract as mobilisation is completed, as part of client project meetings	Joanne Stowell
19	25	Public Protection	<b>Income Reconciliation (Public Protection Licensing)</b> Uncertainty around income reconciliation when the Council is looking to grow income to offset reduced funding	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of processes to reconcile actual licence fee income against expected income held on service specific IT systems.</li> </ul> <p><b>Effect (s):</b></p> <ul style="list-style-type: none"> <li>- Loss of income with potential to reduce service delivery funds</li> <li>- Reputational damage</li> </ul>	Financial	3	2	6	1. Regular income monitoring 2. Good debt recovery systems 3. Monitoring of activity through Performance Indicators 4. Continual Benchmarking of licensing charges against other authorities	3	2	6	1. Refine procedure for reconciliation of expected income against actual and provide suitable training for staff to deliver this	Joanne Stowell

## Environment & Community Services (ECS) Risk Register

													DATE LAST REVIEWED:	09/08/2019
No.	ECS RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK			FURTHER ACTION REQUIRED	RISK OWNER
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
20	26	Streetscene and Greenspace	<b>Income Reconciliation (Waste Management)</b> Uncertainty around income reconciliation linked to the mobilisation of new waste contracts	<b>Cause(s):</b> -Lack of integration between client and service provider IT systems so that data is not linked  <b>Effect (s):</b> - Loss of income from Commercial Waste and Green Garden Waste services with potential to reduce service delivery funds - Costs incurred as a result of additional last minute resources required to deliver services - Reputational damage	Financial	3	2	6	1.Regular income monitoring 2.Good debt recovery systems 3.Monitoring of activity through Performance Indicators	1	2	2	1.Refine procedure for reconciliation of expected income against actual and provide suitable training for staff to deliver this 2.Governance of mobilisation to be provided through the Environmental Services Commissioning project board	Peter McCreedy
21	27	Streetscene and Greenspace	<b>Bromley Town Centre Market Reorganisation</b> Failure to deliver a successful market reorganisation which meets the needs of traders, businesses and customers	<b>Cause(s):</b> -Insufficient engagement to identify the needs of all stakeholders throughout the project  <b>Effect (s):</b> -Inability to deliver a thriving town centre market -Loss of income from reduced market stall hire -Reputational damage caused by dissatisfied businesses	Reputational/ Financial	3	3	9	1.Project Manager identified to lead on market reorganisation 2.Regular stakeholder meetings to review the progress of the market reorganisation (Markets Manager, Markets Supervisor, enforcement team, Highways team, Planning team and BID) 3.Public consultation on the design and layout of the new market position 4.Live RAID log maintained by Markets Manager and Business Support Team detailing any concerns raised by stakeholders and actions to address them 5.Regular dialogue with traders and businesses (in person meet and greet with Markets Manager and Markets Supervisor) 6.Successful launch event with the Mayor for new market location to officially open Christmas trading	2	3	6	1.Lessons learned documentation to be completed 2.Meetings with Highways team to be continued in order to complete outstanding Highways snagging list in the High Street 3.Impact of potential High Street retail units/kiosks on existing market stalls to be reviewed	Sarah Foster
22	28	Public Protection	<b>Dogs and Pests Contract</b> Failure to deliver the contract to the required service levels	<b>Cause(s):</b> -Lack of robustness within contract specification in terms of contract deliverables and Key Performance measures  <b>Effect (s):</b> -Inability to deliver statutory functions -Reputational damage	Service Delivery	3	2	6	1.Identification of named Contract Manager 2.Regular contract management meetings with service provider 3.Review of contract specification to identify change control requirements (a contract change notice regarding a change to invoicing was signed in August 19).	2	2	4		Joanne Stowell
23	29	Public Protection	<b>Out of Hours Noise Service</b> Failure to deliver statutory services	<b>Cause(s):</b> The out of hours noise service is dependant on grant funding from the Mayors Office for Policing & Crime (MOPAC) by way of the Local Crime Prevention Fund. This grant is released on a 2 year cycle, current cycle ends March 2020. The grant was reduced in 2017 and there is no guarantee it will be sustained post April 2020. The service is stalled on a voluntary basis.  <b>Effect:</b> inability to deliver Out of Hours Noise Service.	Service Delivery	3	4	12	1. Annual review with MOPAC on service outcomes	3	4	12	1.Meetings with MOPAC to ensure early warnings of any change to funding levels. MOPAC funding is outside of the control of LBB. 2.Review the Service offer.	Hedley Pugh
24	30	Public Protection	<b>Integrated Offender Management</b> Failure to contribute to IOM in Bromley	<b>Causes:</b> -IOM functions are reliant on grant funding from MOPAC via the LCPF, equates to one day per week. Reduction or cessation of grant after April 2021.  <b>Effect:</b> -Inability to contribute to IOM in Bromley.	Service Delivery	3	4	12	1. Annual review with MOPAC on service outcomes	3	4	12	1.Meetings with MOPAC to ensure early warnings of any change to funding levels. MOPAC funding is outside of the control of LBB.	Rob Vale
25	31	Public Protection	<b>Anti-Social Behavior Co-Ordinator post:</b> Failure to deliver ASB problem solving and partnership activity	<b>Cause(s):</b> -Grant from MOPAC via the LCPF is used to fund the ASB Co-ordinator post which is responsible for delivering targeted ASB project work across the borough with partner agencies. Reduction or cessation of grant after April 2021.  <b>Effect:</b> -Inability to fund this post would result in the cessation of targeted ASB work with partners across the borough. Funding for this post was reduced in 2018 and the shortfall was met by LBB. LBB continue to meet the slight shortfall in 2019.	Service Delivery	3	4	12	1.Review of project outcomes to determine whether they can be delivered on a reduced budget with LBB contributions in kind	3	4	12	1.Review of Community Safety functions to allow for MOPAC project delivery on reduced days per week. MOPAC funding is outside of the control of LBB.	Rob Vale

This page is left intentionally blank

## London Borough of Bromley

Report No.  
ES19052

PART ONE - PUBLIC

---

**Decision Maker:** **Public Protection and Enforcement Policy Development and Scrutiny Committee**

**Date:** **10 September 2019**

**Decision Type:** Non-Urgent                      Non-Executive                      Non-Key

**Title:** **Contract Register**

**Contact Officer:** Sarah Foster, Head of Performance Management and Business Support  
Tel: 020 8313 4023 Email: Sarah.Foster@Bromley.gov.uk

**Chief Officer:** Colin Brand, Director of Environment & Public Protection

**Ward:** All Wards

---

1. Reason for report

- 1.1 This report presents an extract from July 2019 Contracts Register for detailed scrutiny by PDS Committee – all PDS committees will receive a similar report each contract reporting cycle, based on data as at 17<sup>th</sup> June 2019 and presented to E&RC PDS on 3<sup>rd</sup> July 2019.
- 1.2 The Contracts Register contained in 'Part 2' of this agenda includes a commentary on each contract to inform Members of any issues or developments (there is no covering report).

---

2. **RECOMMENDATIONS**

**That PDS Committee:**

- 2.1 **Reviews the appended £50k Contracts Register (which also forms part of the Council's commitment to data transparency); and**
- 2.2 **Notes that the Contracts Register in Part 2 contains additional, potentially commercially sensitive, information in its commentary.**

### Impact on Vulnerable Adults and Children

1. Summary of Impact: The appended Contracts Register covers services which may be universal or targeted. Addressing the impact of service provision on vulnerable adults and children is a matter for the relevant procurement strategies, contracts award and monitoring reports, and service delivery rather than this report.
- 

### Corporate Policy

1. Policy Status: Existing Policy:
  2. BBB Priority: Excellent Council:
- 

### Financial

1. Cost of proposal: - N/A
  2. Ongoing costs: - N/A
  3. Budget head/performance centre: Public Protection and Enforcement Portfolio
  4. Total current budget for this head: - £2.627m
  5. Source of funding: - Existing controllable revenue budget for 2019/20
- 

### Personnel

1. Number of staff (current and additional): - N/A
  2. If from existing staff resources, number of staff hours: - N/A
- 

### Legal

1. Legal Requirement: Statutory Requirement:
  2. Call-in: Not Applicable:
- 

### Procurement

1. Summary of Procurement Implications: Improves the Council's approach to contract management.
- 

### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
- 

### Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A
2. Summary of Ward Councillors comments: N/A

### 3. COMMENTARY

#### Contracts Register Background

- 3.1 The Contracts Database is fully utilised by all Contract Managers across the Council as part of their Contract Management responsibilities, which includes the updating the information recorded on the database. The Register is generated from the Contracts Database which is administered by Commissioning & Procurement Directorate and populated by the relevant service managers (Contract Owners) and approved by their managers (Contract Approvers).
- 3.2 As a Commissioning Council, this information is vital to facilitate a full understanding of the Council's procurement activity and the Contracts Registers is a key tool used by Contract Managers as part of their daily contract responsibilities. The Contract Registers are reviewed by the Commissioning Board, Chief Officers, Corporate Leadership Team, and Contracts Sub-Committee as appropriate
- 3.3 The Contracts Register is produced four times a year for members– though the CDB itself is always 'live'.
- 3.4 Each PDS committee is expected to undertake detailed scrutiny of its contracts – including scrutinising suppliers – and hold the Portfolio Holder to account on service quality and procurement arrangements.

#### Contract Register Summary

- 3.5 The Council has 205 active contracts covering all portfolios as of 17<sup>th</sup> June 2019 for the July reporting cycle as set out in Appendix 1.

3.6

Public Protection and Enforcement			
Item	Category	April 2019	July 2019
<b>Total Contracts</b>	£50k+	<b>7</b>	<b>5</b>
<b>Concern Flag</b> 	Concern Flag	<b>1</b>	<b>1</b>
<b>Risk Index</b>			
	Red	0	0
	Amber	1	1
	Yellow	5	3
	Green	1	1
<b>Total</b>		<b>7</b>	<b>5</b>
<b>Procurement Status</b>			
	Red	3	1
	Amber	0	0
	Yellow	1	1
	Green	1	3
<b>Total</b>		<b>5*</b>	<b>5</b>

\* Plus 2 contracts that were due to start on 1<sup>st</sup> April (CCTV)

- 3.7 Contracts may be flagged for attention due to the tight timescales for tender (rather than any performance issues associated with the delivery of the contract). During this contract cycle, there is one contract flagged for attention (Contract ID 47, Mortuary Contract).
- 3.8 The Mortuary Contract negotiations are nearing completion and a report is being presented on the 10 September PDS agenda for pre-decision scrutiny, prior to the Executive on 18 September 19.

3.9 It should be noted that where Nigel Davies (Executive Director of Environment and Community Services) is stated as the Contract Approver in the CDB extract (Appendix 1), this responsibility transferred to Colin Brand (Director of Environment and Public Protection) as of 5<sup>th</sup> August 2019 and will be updated before the next CDB ‘snapshot’ is taken.

#### 4. IMPACT ON VULNERABLE ADULTS & CHILDREN

4.1 The Corporate Contracts Register covers all Council services: both those used universally by residents and those specifically directed towards vulnerable adults and children. Addressing the impact of service provision on the vulnerable is a matter for the relevant procurement strategies, contracts, and delivery of specific services rather than this summary register.

#### 5. POLICY IMPLICATIONS

5.1 The Council’s renewed ambition is set out in the 2016-18 update to [Building a Better Bromley](#) and the Contracts Database (and Contract Registers) help in delivering the aims (especially in delivering the ‘Excellent Council’ aim). For an ‘Excellent Council’, this activity specifically helps by ‘ensuring good contract management to ensure value-for-money and quality services’.

#### 6. PROCUREMENT IMPLICATIONS

6.1 Most of the Council’s (£50k plus) procurement spend is now captured by the Contracts Database. The database will help in ensuring that procurement activity is undertaken in a timely manner, that Contract Procedure Rules are followed and that Members are able to scrutinise procurement activity in a regular and systematic manner.

#### 7. FINANCIAL IMPLICATIONS

7.1 The Contracts Database and Contract Registers are not primarily financial tools – the Council has other systems and reports for this purpose such as the Budget Monitoring reports. However, the CDB and Registers do contain financial information both in terms of contract dates and values and also budgets and spend for the current year.

#### 8. PERSONNEL IMPLICATIONS

8.1 There are no direct personnel implications but the Contracts Database is useful in identifying those officers directly involved in managing the Council’s contracts.

#### 9. LEGAL IMPLICATIONS

9.1 There are no direct legal implications but the Contracts Database does identify those contracts which have a statutory basis and also those laws which should be complied with in delivering the contracted services.

9.2 A list of the Council’s active contracts may be found on [Bromley.gov.uk](http://Bromley.gov.uk) to aid transparency (this data is updated after each Contracts Sub-Committee meeting).

<b>Non-Applicable Sections:</b>	None
Background Documents: (Access via Contact Officer)	<ul style="list-style-type: none"> <li>• Appendix 1 – Key Data (All Portfolios)</li> <li>• Appendix 2 - Contracts Database Background information</li> <li>• Appendix 3 – Contracts Database Extract PART 1</li> </ul>

## Appendix 1: Key Data (All Portfolios)

Item	Category	April 2019	July 2019
<b>Contracts (&gt;£50k TCV)</b>	All Portfolios	<b>214</b>	<b>205</b>
<b>Flagged as a concern</b> 	All Portfolios	<b>8</b>	<b>4</b>
<b>Capital Contracts</b>	All Portfolios	<b>9</b>	<b>9</b>
<b>Portfolio</b>			
	Adult Care and Health	82	82
	Renewal and Recreation and Housing	10	12
	Public Protection and Safety	7	5
	Environment and Community Services	21	14
	Education, Children and Families	36	36
	Resources Commissioning and Contract Management	58	56
<b>Total</b>		<b>214</b>	<b>205</b>
<b>Risk Index</b>			
	Red	11	10
	Amber	83	74
	Yellow	83	82
	Green	37	39
<b>Total</b>		<b>214</b>	<b>205</b>
<b>Procurement Status</b>			
	Red	72	55
	Amber	24	23
	Yellow	49	45
	Green	69	82
<b>Total</b>		<b>214</b>	<b>205</b>
Procurement Status	Imminent	3	0
<b>Total</b>		<b>3</b>	<b>0</b>

## Appendix 2 - Contracts Register Key and Background Information

### Contract Register Key

1.1 A key to understanding the Corporate Contracts Register is set out in the table below.

Register Category	Explanation
<b>Risk Index</b>	Colour-ranking system reflecting eight automatically scored and weighted criteria providing a score (out of 100) / colour reflecting the contract's intrinsic risk
<b>Contract ID</b>	Unique reference used in contract authorisations
<b>Owner</b>	Manager/commissioner with day-to-day budgetary / service provision responsibility
<b>Approver</b>	Contract Owner's manager, responsible for approving data quality
<b>Contract Title</b>	Commonly used or formal title of service / contract
<b>Supplier</b>	Main contractor or supplier responsible for service provision
<b>Portfolio</b>	Relevant Portfolio for receiving procurement strategy, contract award, contract monitoring and budget monitoring reports
<b>Total Contract Value</b>	The contract's value from commencement to expiry of formally approved period (excludes any extensions yet to be formally approved)
<b>Original Annual Value</b>	Value of the contract its first year (which may be difference from the annual value in subsequent years, due to start-up costs etc.)
<b>Budget</b>	Approved budget for the current financial year. May be blank due to: finances being reported against another contract; costs being grant-funded, complexity in the finance records e.g. capital (also applies to Projection)
<b>Projection</b>	Expected contract spend by the end of the current financial year
<b>Procurement Status</b>	Automatic ranking system based on contract value and proximity to expiry. This is designed to alert Contract Owners to take procurement action in a timely manner. Red ragging simply means the contract is nearing expiry and is not an implied criticism (indeed, all contracts will ultimately be ragged 'red').
<b>Start &amp; End Dates</b>	Approved contract start date and end date (excluding any extension which has yet to be authorised)
<b>Months duration</b>	Contract term in months
<b>Attention </b>	Red flag indicates that there are potential issues, or that the timescales are tight and it requires close monitoring. (also see C&P Commentary in Part 2)
<b>Commentary</b>	Contract Owners provide a comment – especially where the Risk Index or Procurement Status is ragged red or amber. Commissioning & Procurement Directorate may add an additional comment for Members' consideration <i>The Commentary only appears in the 'Part 2' Contracts Register</i>
<b>Capital</b>	Most of the Council's contracts are revenue-funded. Capital-funded contracts are separately identified (and listed at the foot of the Contracts Register) because different reporting / accounting rules apply

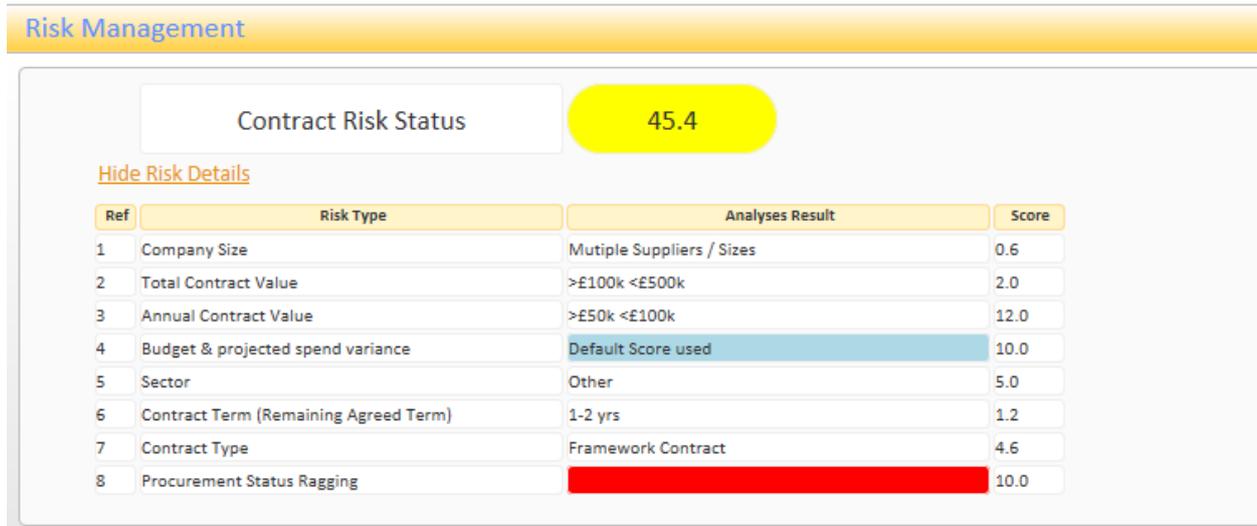
### Contract Register Order

1.2 The Contracts Register is output in Risk Index order. It is then ordered by Procurement Status, Portfolio, and finally Contract Value. Capital contracts appear at the foot of the Register and 'contracts of concern' (to Commissioning & Procurement Directorate) are flagged at the top.

#### Risk Index

1.3 The Risk Index is designed to focus attention on contracts presenting the most significant risks to the Council. Risk needs to be controlled to an acceptable level (our risk appetite) rather than

entirely eliminated and so the issue is how best to assess and mitigate contract risk. Contract risk is assessed (in the CDB) according to eight separate factors and scored and weighted to produce a Risk Index figure (out of 100). These scores are ragged to provide a visual reference.



### Procurement Status

- 1.4 A contract's Procurement Status is a combination of the Total Contract Value (X axis) and number of months to expiry (Y axis). The table below is used to assign a ragging colour. Contracts ragged red, amber or yellow require action – which should be set out in the Commentary. Red ragging simply means the contract is nearing expiry and it is not an implied criticism (indeed, all contracts will ultimately be ragged 'red').

		Procurement / Commissioning Status				
		£5k - £50k	£50k - £100k	£100k - £173k	£173k - £500k	>£500k
Period	3 months					
	6 months					
	9 months					
	12 months					
	18 months					
		Total Contract Value				

	Requires an agreed plan
	Develop / test options
	Consider options
	No action required

This page is left intentionally blank

**Contract Register Report - £50k Portfolio Filtered - Public Protection and Safety - July 2019**

Main Contract Data							Finance Data				Contract Terms					
Risk Index	Contract ID	Owner	Approver	Contract Title	Supplier Name	Portfolio	Total Value	Original Annual Value	Budget	Projection	Proc. Status	Start Date	End Date	Months Duration	Attention	Capital
● Y	47	Joanne Stowell	Nigel Davies	<a href="#">Mortuary Contract</a>	Princess Royal University Hospital Mortuary via Kings College Hospital NHS Foundation Trust (with LB Bexley)	Public Protection and Safety	474,000	96,000			■ R	01/10/2014	30/09/2019	60	Ⓜ	
● Y	3763	Hedley Pugh	Joanne Stowell	<a href="#">Dogs &amp; Pest Control Services</a>	SDK Environmental Ltd	Public Protection and Safety	234,915	78,305			■ Y	01/02/2018	31/01/2021	36		
● A	4859	Robert Vale	Joanne Stowell	<a href="#">** Now Live ** CCTV Monitoring</a>	Enigma CCTV Ltd	Public Protection and Safety	1,441,000	288,200			■ G	01/04/2019	31/03/2024	60		
● Y	4858	Robert Vale	Joanne Stowell	<a href="#">** Now Live ** CCTV Repair and Maintenance Contract</a>	Tyco Fire & Integrated Solution (UK) Ltd	Public Protection and Safety	691,081	135,573	138,220	138,220	■ G	01/04/2019	31/03/2024	60		
● G	3799	Joanne Stowell	Nigel Davies	<a href="#">Coroners Service</a>	London Borough of Croydon	Public Protection and Safety	448,640	224,320			■ G	01/04/1966	31/08/2029	762		

This page is left intentionally blank

ES19054 PP&E PORTFOLIO PLAN - PERFORMANCE OVERVIEW (2019/20)																			
Outcome	No.	INDICATOR (National / Local)	DESCRIPTION	2014-15 ACTUAL	2015-16 ACTUAL	2016-17 TARGET	2016-17 ACTUAL	2017-18 TARGET	2017/18 ACTUAL	2018/19 TARGET	2018/19 ACTUAL	Apr-19	May-19	Jun-19	Year End Projection	GOOD PERFORMANCE	2019-20 TARGET	2018-19 RAG STATUS	COMMENTARY (BY EXCEPTION)
1: We will keep Bromley safe	1	1A	Number of Community Impact Days	12	12	12	12	12	12	12	12	1	1	1	12	HIGH	12	GREEN	
2: We will protect consumers	2	2A	Awareness raising events & training to groups & partners (No.)	45	80	N/A	115	70	129	70	90	8	3	11	88	HIGH	70	GREEN	
	3	2B	Rapid Response interventions responded to within 2 hours (%)	N/A	N/A	N/A	N/A	N/A	New KPI for 18/19	N/A	100.00%	0% (1)	100% (3)	100% (3)	100.00%	OUTCOME	100%	OUTCOME	In April, an officers received a call to the rapid response number on Easter Sunday from a member of the public. The officer spoke to a family member on Easter Sunday and the following day a visit took place. The officer advised the member of the public to no longer liaise with the rogue trader.
	4	2C	Test purchase operations to detect the sale of age-restricted products (No.)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	New KPI for 19/20	13	20	0	100.00	HIGH	100	GREEN	Of the 33 test purchases, 13 related to knives (in partnership with the police) and 20 related to Challenge 25 compliance test purchasing.
3: We will support and regulate businesses	5	3A	Inspections of high-risk food hygiene business undertaken (%) (Risk A and B food premises)	N/A	100	100	100% (A) 96% (B)	100% (A) 97% (B)	100% (A) 97% (B)	100% (A) 97% (B)	100% (A) 100% (B)	Annual	Annual	Annual	Annual	HIGH	100% (A) 100% (B)	GREEN	
	6	3B	Inspections of high-risk food standards businesses undertaken (%) (Risk A)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	New KPI for 19/20	Annual	Annual	Annual	Annual	HIGH	100%	GREEN	
	7	3C	Zero rated food premises demonstrating improvement on their second inspection (%)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	New KPI for 19/21	Annual	Annual	Annual	Annual	HIGH	100%	GREEN	
	8	3D	Respond to 80% of complaints/enquiries about food and food premises within 5 working days (%)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	New KPI for 19/20	97%	90%	100%	95.67%	HIGH	80%	GREEN	
	9	3E	Complete targeted operations to ensure businesses abide by licence conditions (%)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	New KPI for 19/20	Delivery in Q4	Delivery in Q4	Delivery in Q4	Delivery in Q4	OUTCOME	100%	OUTCOME	

Outcome	No.	INDICATOR (National / Local)	DESCRIPTION	2014-15 ACTUAL	2015-16 ACTUAL	2016-17 TARGET	2016-17 ACTUAL	2017-18 TARGET	2017/18 ACTUAL	2018/19 TARGET	2018/19 ACTUAL	Apr-19	May-19	Jun-19	Year End Projection	GOOD PERFORMANCE	2019-20 TARGET	2018-19 RAG STATUS	COMMENTARY (BY EXCEPTION)
4: We will protect and improve the environment	10	4A	Comply with 100% of CCTV Evidence Requests (%)	N/A	New KPI for 19/20	100.00%	100.00%	100.00%	100.00%	HIGH	100%	GREEN							
	11	4B	Comply with 100% of Contaminated Land report requests (%)	N/A	New KPI for 19/20	100.00%	100.00%	100.00%	100.00%	OUTCOME	100%	OUTCOME							
	12	4C	Serve statutory notices where appropriate (Nuisance and pollution) (%)	N/A	New KPI for 19/20	100.00%	100.00%	100.00%	100.00%	OUTCOME	100%	OUTCOME							
	13	4D	Cases where investigations of breaches of planning control are completed (%)	N/A	New KPI for 19/20	100% (67)	100% (78)	100% (76)	100%	OUTCOME	100%	OUTCOME							
	14	4E	Issue validated licences for Houses in Multiple Occupation within 12 weeks (%)	N/A	New KPI for 19/20	(3 out of 4) 75%	(5 out of 8) 63%	(9 out of 13) 69%	75%	OUTCOME	75%	OUTCOME							
	15	4F	Number of Fly-tipping enforcement actions (No.)	375	330	325	328	325	258	300	254	31	8	24	252	HIGH	300	AMBER	Further review of Enforcement Service procedures will assist in contributing to delivering this objective. A Fly-Tipping and Enforcement Working Group is now meeting regularly and is delivering against the Fly-Tipping Action Plan (FTAP). This will include issuing additional enforcement warning letters. The FTAP update is to be presented at the ECS PDS meeting in November 2019.
	16	4G	Number of Fly-tipping incidents (No.)	3373	3343	3250	3246	3250	3067	3069	3172	281	258	276	3260	LOW	3000	GREEN	
	17	4H	Parking appeals heard by the Environment and Traffic Adjudicators (ETA) against PCNs issued by LBB (No.)	459	331	N/A	274	300	213	300	185	17	4	9	120	LOW	300	GREEN	
	18	4I	Parking ETA cases won by LBB (% of cases heard)	74.0%	75.0%	N/A	81.0%	80.0%	80.0%	80.0%	81.6%	64.7%	50.0%	77.8%	64.2%	HIGH	80%	AMBER	This target is only slightly off track. As a result of recent case decisions, changes to various processes have been implemented within parking services which will address this performance moving forward.

Report No:  
CSD19121

London Borough of Bromley

**PART ONE - PUBLIC**

---

**Decision Maker:** **PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE**

**Date:** 10<sup>th</sup> September 2019

**Decision Type:** Non-Urgent                      Non-Executive                      Non-Key

**Title:** **WORK PROGRAMME**

**Contact Officer:** Stephen Wood, Democratic Services Officer  
Tel: 020 8313 4316 E-mail: [stephen.wood@bromley.gov.uk](mailto:stephen.wood@bromley.gov.uk)

**Chief Officer:** Mark Bowen, Director of Corporate Services

**Ward:** All

---

1. Reason for report

1.1 Members are asked to review the Committee's Work Programme, and also to make suggestions for any modifications/additions to the Work Programme as considered appropriate

1.2 Members should note that the Work Programme is fluid and subject to change as required.

---

**2. RECOMMENDATIONS**

**2.1 That the Committee:**

**(1) Notes the current Work Programme.**

**(2) Comments on any matters that it thinks should be incorporated into the Work Programme going forward.**

### Corporate Policy

1. Policy Status: Existing Policy: Committees normally receive a report on the Work Programme and Contracts Register at each meeting.
  2. BBB Priority: Excellent Council Safer Bromley
- 

### Financial

1. Cost of proposal: No Cost
  2. Ongoing costs: Not Applicable:
  3. Budget head/performance centre: Democratic Services
  4. Total current budget for this head: £358,740
  5. Source of funding: 2019/2020 revenue budget
- 

### Staff

1. Number of staff (current and additional): 8 posts (6.79fte)
  2. If from existing staff resources, number of staff hours: Maintaining the Committee's Work Programme normally takes approximately an hour per meeting, but is fluid and may need to be modified as required.
- 

### Legal

1. Legal Requirement: None:
  2. Call-in: Not Applicable: This report does not involve an executive decision.
- 

### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): This report is primarily for the benefit of Committee Members.
- 

### Ward Councillor Views

1. Have Ward Councillors been asked for comments? No
2. Summary of Ward Councillors comments: N/A

### 3. COMMENTARY

#### Forward Programme

- 3.1 The table at **Appendix 1** sets out the Public Protection and Enforcement PDS Forward Work Programme. The Committee is invited to comment on the schedule and to propose any changes it considers appropriate. The Committee is also invited to make suggestions with regard to Member visits.
- 3.2 Other reports may come into the Programme - schemes may be brought forward or there may be references from other Committees, the Portfolio Holder or the Executive.
- 3.3 Consideration may need to be applied to the convening of a meeting to discuss the future development of the work programme for the rest of 2019-2020.

### 4. POLICY IMPLICATIONS

- 4.1 Each PDS Committee is responsible for setting its own work programme.

Background Documents: (Access via Contact Officer)	Previous Work Programme reports and minutes of previous meetings where additions to the Work Programme may have been agreed.  The Public Protection and Enforcement Portfolio Plan.
---	---

**PP&E PDS COMMITTEE - FORWARD WORK PROGRAMME****PUBLIC PROTECTION AND ENFORCEMENT PDS—10<sup>th</sup> September 2019**

Matters Outstanding
Police Update (With a focus on the CID)
Portfolio Holder Update
MOPAC (Verbal Update)
Capital Programme Monitoring Report
Contracts Register Report and Contract Database Extracts (Part 1 and 2)
Risk Register Update Report
PP&E Performance Overview
Draft Food Safety Plan Report
Mortuary Update Report (Part 2)
Work Programme

**PUBLIC PROTECTION AND ENFORCEMENT PDS—14<sup>th</sup> November 2019**

Matters Outstanding
Police Update
Portfolio Holder Update
Draft Public Protection Enforcement Policy Report
Portfolio Plan—Six Month Performance Overview
Budget Monitoring report
Capital Monitoring report-Quarter 2
Planning Enforcement Scrutiny report--TBC
Work Programme

**PUBLIC PROTECTION AND ENFORCEMENT PDS—4<sup>th</sup> February 2020**

Matters Outstanding
Police Update
Portfolio Holder Update
Public Protection Enforcement Policy Report—Final.
Draft Budget Report—2019-2020
Update on an aspect of the Portfolio Plan like 'Keeping Bromley Safe' (TBC)
MOPAC update (TBC)
Update for Emergency Planning and Business Continuity
Public Protection and Enforcement Performance Overview
Contracts Register Report and CDB extract
Environmental and Community Services Risk Register Update
Work Programme

**PUBLIC PROTECTION AND ENFORCEMENT PDS—31<sup>st</sup> March 2020**

Matters Arising
Police Update
Portfolio Holder Update
PP&E Capital Programme Monitoring—Quarter 3
Budget Monitoring report

Neighbourhood Management Enforcement Update Scrutiny report
Public Protection Performance against agreed Enforcement Indicators report
Prevent Update
PP&E Portfolio Plan Performance Overview
Work Programme
<b>POSSIBLE FUTURE PRESENTATIONS and AGENDA ITEMS</b>
Knife and Serious Violence Action Plan
Report on LBB's contract with the Coroner.
Update on the outcomes pertaining to the Bromley Locality Review.
Report on the link between crime and mental health issues
<b>POSSIBLE FUTURE VISITS</b>
Coroners' Court.
Bethlem Hospital

This page is left intentionally blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is left intentionally blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is left intentionally blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is left intentionally blank