



THE LONDON BOROUGH
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DATE: 2nd November 2021

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

Councillor David Cartwright QFSM (Chairman)
Colin Hitchins (Vice-Chairman)
Councillors Kathy Bance MBE, Julian Benington, Kim Botting FRSA, Mike Botting, Hannah Gray, Alexa Michael and Chris Pierce

Non-Voting Co-opted Members –

Sharon Baldwin, Chairman - Safer Neighbourhood Board
Dr Robert Hadley, Bromley Federation of Residents Associations
Alf Kennedy, Bromley Neighbourhood Watch
Jacob Evers, Bromley Youth Council
Oscar Seal, Bromley Youth Council

A meeting of the Public Protection and Enforcement Policy Development & Scrutiny Committee will be held at Bromley Civic Centre on **WEDNESDAY 10 NOVEMBER 2021 AT 7.00 PM**

TASNIM SHAWKAT
Director of Corporate Services & Governance

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

PLEASE NOTE: This meeting will be held in the Council Chamber at the Civic Centre, Stockwell Close, Bromley, BR1 3UH. Members of the public can attend the meeting: you can ask questions submitted in advance or just observe the meeting. There will be limited space for members of the public to attend the meeting – if you wish to attend please contact us, before the day of the meeting if possible, using our web-form:

<https://www.bromley.gov.uk/CouncilMeetingNoticeOfAttendanceForm>

Please be prepared to follow the identified social distancing guidance at the meeting, including wearing a face covering.

1 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS

2 DECLARATIONS OF INTEREST

3 MINUTES OF THE PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE HELD ON 7TH SEPTEMBER 2021 (Pages 1 - 10)

4 QUESTIONS FROM COUNCILLORS OR MEMBERS OF THE PUBLIC

In accordance with the Council's Constitution, questions from the public that are not specific to reports on the agenda must have been received in writing by 5pm, 10 working days before the date of the meeting. For this meeting, questions not specific to the agenda should have been received by 5pm on 27th October.

Questions **specifically regarding reports on the agenda** should be received within two working days of the normal publication date of the agenda. The deadline is given on each agenda. For this meeting, any questions relating to reports on the agenda should be received by **Democratic Services by 5pm on Thursday, 4th November.**

The Council is now taking both oral and written questions.

When submitting questions, each question should be limited to 50 words, and please specify if you would like to attend the meeting and receive an oral response, or if you would like to receive a written response. Questions can be emailed to the Committee Clerk: stephen.wood@bromley.gov.uk

5 MATTERS OUTSTANDING (Pages 11 - 16)

A report is received at every meeting that details any matters that may be outstanding.

6 POLICE UPDATE (Pages 17 - 18)

An update from the police is provided at every meeting.

HOLDING THE PORTFOLIO HOLDER TO ACCOUNT

7 PORTFOLIO HOLDER VERBAL UPDATE

8 PUBLIC PROTECTION AND ENFORCEMENT PERFORMANCE OVERVIEW (Pages 19 - 20)

9 PRE-DECISION SCRUTINY OF PORTFOLIO HOLDER REPORTS

Portfolio Holder decisions for pre-decision scrutiny.

a BUDGET MONITORING 2021/22 (Pages 21 - 26)

POLICY DEVELOPMENT AND OTHER ITEMS

- 10 **THE DRAFT PROTOCOL FOR SCRUTINY OF THE SAFER BROMLEY PARTNERSHIP** (Pages 27 - 42)
- 11 **MINUTES OF THE PREVIOUS MEETING OF THE SAFER BROMLEY PARTNERSHIP STRATEGIC GROUP** (Pages 43 - 58)
- 12 **ENFORCEMENT ACTIVITY UPDATE 2020-2021** (Pages 59 - 88)
- 13 **PUBLIC PROTECTION RISK REGISTER** (Pages 89 - 98)
- 14 **PUBLIC PROTECTION CONTRACTS REGISTER** (Pages 99 - 108)
- 15 **WORK PROGRAMME** (Pages 109 - 114)

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PUBLIC PROTECTION AND ENFORCEMENT POLICY DEVELOPMENT & SCRUTINY COMMITTEE

Minutes of the meeting held at 7.00 pm on 7 September 2021

Present:

Councillor David Cartwright QFSM (Chairman)
Colin Hitchins (Vice-Chairman)
Councillors Kathy Bance MBE, Julian Benington,
Kim Botting FRSA, Mike Botting, Hannah Gray,
Alexa Michael and Chris Pierce

Sharon Baldwin, Dr Robert Hadley and Oscar Seal

Also Present:7

Councillor Angela Page

STANDARD ITEMS

16 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS

Apologies were received from Alf Kennedy, Jacob Eysers, Superintendent Andy Brittain and Chief Inspector Craig Knight.

17 DECLARATIONS OF INTEREST

There were no declarations of interest.

18 MINUTES OF THE PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE HELD ON JUNE 22nd 2021

The Committee considered the minutes of the meeting of the Public Protection and Enforcement PDS Committee held on June 22nd 2021.

RESOLVED that the minutes of the meeting held on June 22nd 2021 be agreed as a correct record.

19 QUESTIONS FOR THE PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO HOLDER OR CHAIRMAN

No questions were received.

20 MATTERS OUTSTANDING

CSD 21089

Members noted that the matter relating to 'footpath 136' was ongoing. The Director for Environment and Community Services promised to investigate this further and to report back to the relevant Member and the rest of the Committee.

Members noted the update with respect to traffic policing. The Chairman expressed his concern with the response that had been received from MOPAC when this matter was raised with them previously. The Chairman requested that the Portfolio Holder go back to MOPAC and ask again for the implementation of more traffic policing in Bromley. The Chairman understood that some 3000 people per year in the UK were killed as a result of poor driving and considered this 'high harm'.

A Member raised the issue concerning the use of motorised scooters, mopeds and quad bikes in the borough. She felt that more action was required to curb their usage.

The Committee noted that the update with respect to the police hotspot strategy was still outstanding.

An update was received with respect to minute 12 which was the proposed meeting between the Chairman, Portfolio Holder and the Assistant Director to discuss how scrutiny of the Safer Bromley Partnership should be undertaken going forward. It was noted that the meeting was planned for the following week.

An explanation was provided concerning the 'Challenge 25' policy.

It was noted that Chief Inspector Craig Knight had disseminated the requested update regarding the 101 service. The Chairman said that he would like to have more understanding concerning the volume of calls that were discontinued because people were waiting a long time in a queue to be answered. He felt that this was an issue that still needed to be monitored.

RESOLVED that:

- 1) An update should be provided from the Director concerning the outstanding matter of 'footpath 136'.**
- 2) The Portfolio Holder should continue to raise the matter of traffic policing in Bromley with MOPAC.**
- 3) The Committee should (in due course) receive an update from the police with respect to the police's 'hotspot strategy'.**
- 4) The Committee should continue to monitor the performance of the 101 service and if possible, data should be provided concerning the number of calls that were discontinued.**

21 POLICE UPDATE

The police had sent their apologies on this occasion because they were dealing with various protests in London, in particular with regards to Extinction Rebellion.

The Chairman expressed concern that much information was being provided by the police which in fact may be of little value with respect to this Committee's role in scrutiny. He expressed the view that what was required was the setting up of a small task and finish group to look into what information was actually required for the Committee to fulfil its role, without causing significant extra unnecessary work for the police. It was important to clearly identify what the police should be reporting on.

It was noted that various police systems existed for identifying and extracting information, which made it difficult for the police in terms of collecting data to present to the Committee. In terms of the task and finish group, the Chairman hoped the police might agree to sit on the group, he also wanted the Vice Chairman of the PDS Committee to chair the task and finish group which should be 'cross-party'.

A Member stated that what was required was to clarify the terms of reference that the police would operate under in respect to the scrutiny committee. The Chairman made it clear that he did not want to ask the police for information that was not really required; he wanted to streamline the process.

A Member suggested that when the police attended the Committee, they should report on a particular theme. The Chairman said that this approach had been trialled some years ago but was not particularly successful; going forward it would be the remit of the task and finish group to consider what should be scrutinised by the PDS Committee.

A Member stated that she found the current briefings useful and reiterated the view that the thematic approach had not worked.

A Co-opted member pointed out that police resources were tight and it was the case that new engagement panels were planned that would further stretch limited police resources. This being the case, it was important for the PDS Committee to scrutinise issues that were relevant and would make a difference.

A Member cautioned that it was possible to 'create' hotspots by making more arrests. The Chairman replied that hotspots had been identified in Penge, the Crays and Mottingham, but that it was important to clarify what was meant by 'hotspots'.

A Member thanked the police for the excellent policing work that had been undertaken in the Crays with respect to drugs, where lots of arrests had been made.

The police had said that they would be issuing PCNs with respect to aggressive beggars in the borough. Members noted that the same problematic beggar was still operating in the Penge area.

A Member expressed the view that the last Community Impact Day in the Penge area was not successful and was not in reality an Impact Day at all. It was the case that when the police arrived they were directed straight to Betts Park. There was no briefing for the police officers to instruct them where to go. A weapons sweep was conducted, but again this was limited to Betts Park. The point the Member was making that what occurred (in her view) was more some sort of youth related activity within Betts Park and was not a proper Community Impact Day. The community felt somewhat cheated; she hoped that this was not just a 'tick box' exercise to say that the full Community Impact Day had taken place when in fact this was not the case. She hoped that measures would be taken to avoid a similar scenario arising in the future. The Chairman said that the Director would look into what happened on that occasion.

A Member referred back to the issue of beggars and stated that there was still one at Bromley South on a Saturday evening and there were still beggars on trains and bus stops. The Chairman said that the number for British Transport Police was publicised on trains and buses, and that they responded swiftly to reported incidents. It was suggested that BTP be invited to speak to the Committee.

The Committee expressed concern around the dangers posed by motorised scooters. They were dangerous because they were fast and silent. This was a matter that the Chairman wished to take up with the police. It was felt that in some cases their use could prove deadly.

RESOLVED that:

1) A Task and Finish Group be set up and chaired by the Vice Chairman of the PDS Committee, Councillor Colin Hitchins. Councillor Kathy Bance and the police would also be invited to sit on the group. The remit of the task and finish group would be to establish specifically what matters should be reported to the PDS Committee from the police and in what form.

2) Enquiries should be made with the police so that an update could be provided concerning what was being done to tackle the problem of aggressive begging in Bromley.

3) The Director for Environment and Public Protection would investigate what went wrong at the last Community Impact Day in Penge.

4) British Transport Police should be invited to attend a future committee meeting.

5) Enquiries should be made with the police to ascertain what plans they had to tackle the problem and dangers posed by motorised scooters in the borough.

HOLDING THE PORTFOLIO HOLDER TO ACCOUNT

22 PUBLIC PROTECTION AND ENFORCEMENT PERFORMANCE OVERVIEW

The Committee noted that item 2A was flagged as red. This was the number of awareness raising events and training delivered to various groups and partners. The performance report noted that this target would not be met as a direct result of the pandemic. The Assistant Director commented that the end projection should now be blank, as it was not possible to determine the amount of opportunities at this stage.

An update was received with respect to item 2C which was compliance with Challenge 25 test purchase operations. This target was also not going to be met because of the impact of Covid restrictions. The Council was now working closely with Chief Inspector Craig Knight and the Police Cadets and it was hoped that momentum in this area could be picked up in the near future.

Items 3A and 3B would be picked up separately under the Food Safety Plan.

It was noted that there had been no serious outbreaks of food poisoning and even if there had been, this would have been responded to by the Council as it had a statutory duty to do so.

RESOLVED that the Performance Overview report be noted.

a OUTTURN 2020/21

FSD 21026

The Chairman informed Members that this report had already gone to the Executive and was primarily for information only.

A Member referred to the section where it mentioned that some funding had been transferred from the Highways budget to the Public Protection budget post funding and he wondered what that meant. It was explained that sometimes services jointly funded a post. In this case a post had been jointly funded with Highways to the value of £16k. The post in the end got delivered to something else and so the funding was recalled.

A Member referred to the notes in the report that indicated that there was an underlying staffing underspend of £129k due to a number of in year vacancies. She wondered what those vacancies were in respect of. The positions were listed as follows:

- Food Service Vacancies
- Vacancies in the Trading Standards Team
- ASB and Nuisance Vacancies
- Recruitment to the post of Head of Service formerly held by Tony Baldock

RESOLVED that the Outturn report for 2020/21 be noted.

b BUDGET MONITORING 2021/22

FSD 21053

Members resolved that the Budget Monitoring report be noted.

c FOOD SAFETY SERVICE PLAN 2020--2021

ES 19061

The Food Safety Service Plan was a requirement of the FSA (Food Standards Agency).

Members were briefed that the ground gained in 2019 whereby the Council emerged from a red audit had been lost and LBB now had a backlog of cases to deal with. This was the same for all local authorities.

The FSA had drafted a two stage recovery plan that went to 2024. The Council's plans for dealing with the backlog were outlined in the report. LBB's plans exceeded the FSA requirements. It was hoped to address most of the backlog in the first year. The ability to deliver the recovery plan depended on the identified variables. The identified variables included the ability to recruit to the right posts, maintain staffing levels, and the availability of officers to work overtime.

The Assistant Director said that at the moment she was not seeking additional resources and the Team were trying to think outside of the box and develop new strategies.

The Chairman requested that the recovery plan be circulated to the Committee and applauded the setting of ambitious targets. The Assistant Director said that she had confidence in her Team to hit the targets and that new registrations were included in the plan.

The issue of the possible in house training of staff was raised. This was problematic as specialist certification was required from approved colleges. One of these colleges was Nescot and the training was long and expensive. Administrative staff were being encouraged to 'triage' where they could. Apprentices and graduates were being used to help when possible. London was vying for the same resources.

The matter of pay was raised and a Member asked if Bromley was paying enough. The Assistant Director responded that terms and conditions were under review.

It was clarified by the Assistant Director that the recovery plan noted in section 3.8 of the report was the FSA Recovery Plan and not LBB's Recovery Plan.

RESOLVED that the Food Safety Service Recovery Plan be noted.

23 ENVIRONMENT AND PUBLIC PROTECTION RISK REGISTER

ES 20102

Members were referred to line 24 which highlighted a risk with respect to potential increased costs of the Coroner's Service. It was noted that increased costs would be challenged by the Director for Environment and Public Protection.

Members noted line 28 which was a red risk concerning issues with the customer relationship management software. On the 1st of July, the CRM system was changed to CXM. In the trial of the new software, the new system had worked successfully, but after being rolled out it was noted that the system was generating errors and so service calls and requests were not being dealt with in a timely manner. Officers were working hard with IT and BT to resolve the issues.

It was noted that the Fly Tipping Action Plan update was scheduled for the November meeting. The previous Neighbourhood Manager that dealt with fly tipping had left the Council and his replacement was due to start work on the 20th of September. The Chairman requested that the specific duties and limitations with respect to the job specification of the new officer be clearly communicated so that Members would not be making requests that would be outside of his job specification.

RESOLVED that the Risk Register be noted and that the job specification/role of the new Neighbourhood Manager be made available to the Committee.

24 MINUTES OF THE PREVIOUS MEETING OF THE SAFER BROMLEY PARTNERSHIP BOARD

A Member referred to minute 21 of the previous minutes of the Safer Bromley Partnership Board. This minute stated that Chief Inspector Craig Knight would be bringing a paper regarding high harm crime and the Cambridge Crime High Harm Index to the next meetings of the SBP and the PDS Committee. The Committee was informed that the paper was not ready because Chief Inspector Craig Knight had been moved on to another piece of important work with respect to violence against women and girls, specifically the issue of misogyny. Chief Inspector Craig Knight would be providing an update

concerning this at the meeting of the Safer Bromley Partnership on the 9th of September.

RESOLVED that the minutes of the Safer Bromley Partnership that met on the 17th of June be noted.

25 TRANSFORMING BROMLEY 2019--2023: FIRST TWO YEARS

CSD 21086

The Chairman reminded the Committee that this report had been considered by the Executive at its meeting on the 30th of June 2021 and that therefore this report had come to the PDS Committee primarily for noting.

The Chairman referred to section 3.30 and commented that he would have liked to have seen a reference to 'crime' there--as this was an important service area that was scrutinised by the Committee.

The Chairman would have liked to have another point added to the report which was the fact that the Committee played a vital role in ensuring that the many statutory responsibilities with respect to public protection and enforcement were carried out.

RESOLVED that the comments made by the Chairman and the report be noted.

26 PROPOSED CHANGES TO THE OUT OF HOURS NOISE SERVICE

ES 20111

This was for information only as the proposed changes to the Out of Hours Noise Service had been actioned previously as an Independent Portfolio Holder decision. This was able to be implemented from the 4th of August 2021.

RESOLVED that the report be noted.

27 WORK PROGRAMME

CSD 21090

The following additions to the Work Programme were requested:

- 1) At the November meeting, the report from the new Task and Finish Group be presented to the Committee
- 2) It was requested that going forward an item be added to the work programme for each meeting for an update from the Portfolio Holder.

3) The British Transport Police should be invited to a future meeting.

RESOLVED that the Work Programme be noted and the items listed above be added to the programme going forward.

The meeting ended at 8.30 pm

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Agenda Item 5

Report No.
CSD 21115

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: Public Protection and Enforcement PDS Committee

Date: 10th November 2021

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

Chief Officer: Tasnim Shawkat, Director of Corporate Services and Governance

Ward: N/A

1. Reason for report

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

2. RECOMMENDATION

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

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

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: £366k
 5. Source of funding: 2021/2022 revenue budget
-

Staff

1. Number of staff : Currently 5 full time staff
 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>Minute 6 22nd June 2021 Police Update</p>	<p>At the next meeting with MOPAC, the Portfolio Holder should pursue the case for the return of traffic policing in Bromley.</p>	<p>The Portfolio Holder was unable to attend the next MOPAC meeting. Cllr Lymer was able to attend and raised the issue. MOPAC said it was not something that any other borough had mentioned to them yet.</p> <p>Therefore they were unlikely to make it an explicit priority in the new Police & Crime Plan, but they would make a note. There would be a Trust and Confidence section in the new plan and that would be about how residents felt the Police were dealing with local priorities – it could be encompassed in there on a borough level.</p>
<p>Minute 20 7th Sept 2021 Matters Arising</p>	<p>The Portfolio Holder should continue to raise the matter of traffic policing in Bromley with MOPAC</p>	<p>The opportunity for the Portfolio Holder to raise this further with MOPAC has not yet arisen. The Portfolio Holder will raise the matter again when a suitable opportunity arises.</p>
<p>Minute 6 22nd June 2021 Police Update</p>	<p>An update should be provided to the Committee regarding the police 'hotspot strategy'.</p> <p>It was noted that this had not been provided at the September meeting so this is still required.</p>	<p>Operation 'Avert' has been in place since 26th July 2021 and is focused on officers across the MPS completing a large volume of hotspot patrols each day.</p> <p>Because this is part of an academic study to understand the impact of patrol in a scientific way, the hotspots are randomly assigned on a daily basis. As such, the borough will benefit from these additional patrols on days which are not currently predictable. Three hotspots feature in this experiment for LBB. Bromley, Penge and Orpington town centres.</p> <p>Each hotspot is visited 3 times during each shift for a set timescale.</p> <p>GPS data is utilised to track officers deployed to Operation Avert each day.</p> <p>The Operation is part of a randomised control trial (RCT) supported by the MPS Strategic Insight Unit.</p> <p>In addition to Operation AVERT, every ward's individual hot spot has been measured and is being supplied to ward teams. The ward officers will be able to utilise this area map of increased harm on each ward to focus their own patrol locally. There will be an expectation moving forward that ward teams patrol these areas every shift when they are on duty for a limited amount of time. This is an ongoing piece of work and is being rolled out across the BCU slowly and with care to ensure it is proven to be worthwhile and does not detract from ward priorities.</p>

<p>Minute 12 22nd June 2021 Update on Annual SBP report</p> <p>Minute 20 7th Sept Matters Arising</p>	<p>The Chairman would meet with the Assistant Director for Public Protection and Enforcement, and the Portfolio Holder to discuss how scrutiny of the Safer Bromley Partnership should be undertaken going forward and how the corresponding annual update should be presented to the PDS Committee.</p> <p>An update was received with respect to minute 12 which was the proposed meeting between the Chairman, Portfolio Holder and the Assistant Director to discuss how scrutiny of the Safer Bromley Partnership should be undertaken going forward.</p> <p>It was noted that the meeting was planned for the following week.</p>	<p>The initial meeting took place on the 8th October 2021, whereby it was discussed that the scrutiny of the SBP needed to be formalised. Cllr Hitchins headed a task and finish group, and this met on the 20th October 2021, and a draft protocol for scrutiny of the SBPB, together with a draft data package was agreed. This will be presented at PP&E PDS on the 10th November 21.</p>
<p>Minute 15 22nd June 2021 Work Programme</p> <p>Minute 20 7th Sept Matters Outstanding</p>	<p>A question would be submitted to the police concerning possible inadequacies in the 101 service and a response to this should be provided at the September meeting</p> <p>The Committee should continue to monitor the performance of the 101 service and if possible, data should be provided concerning the number of calls that were discontinued.</p>	<p>Chief Inspector Craig Knight had provided a written response for the September meeting.</p> <p>It has been confirmed that the scrutiny of the 101 service falls outside of the Committee's remit. Notwithstanding this, Members can view quarterly reports from MOPAC that cover 999 and 101 calls as well as responses to I calls (15 minutes) and S calls (60 minutes) down to the BCU level. The Q3 report is attached. Bromley shows as 88% for I and 86% S calls.</p> <p>https://www.london.gov.uk/sites/default/files/mopac_q3_2020-21_monitoring.pdf</p>
<p>Minute 21 7th Sept 21 Police Update</p>	<p>A Task and Finish Group be set up and chaired by the Vice Chairman of the PDS Committee, Councillor Colin Hitchins. Councillor Kathy Bance and the police would also be invited to sit on the group. The remit of the Task and Finish Group would be to establish specifically what matters should be reported</p>	<p>The task and finish group met on 20th October 2021, whereby the scrutiny role of the PP&E PDS regarding the SBP was explained, and a protocol will be published for noting. See minute 12 above for more details.</p>

	to the PDS Committee from the police and in what form.	
Minute 21 7th Sept 21 Police Update	Enquiries should be made with the police so that an update could be provided concerning what was being done to tackle the problem of aggressive begging in Bromley.	<p>The current operational plan in dealing with begging in the Town Centre allows for two tactical options for the officers to follow; on every occasion there needs to be a form of engagement to disrupt this activity.</p> <p>Option 1: Issuing Community Resolutions & Dispersal from the area. Begging falls within the remit of the CR scheme in dealing with offences. This will mean recording on the crime reporting system the details of the offence committed. Should there be repeat offenders, officers will move to the arrest phase once one warning has been issued.</p> <p>Option 2 Arrest for Begging under Section 3 of the Vagrancy Act 1824 – Code G will fall under confirming Name & Address / Prevention of further offences for repeat offenders. Powers are to be used under the Proceeds of Crime Act to seize money earned through this activity.</p> <p>To date the town centre officers have taken a robust approach in dealing with beggars; typically we see a rotation of beggars who come from different areas.</p>
Minute 21 7th Sept 21 Police Update	The Director for Environment and Public Protection would investigate what went wrong at the last Community Impact Day in Penge.	This matter was raised with Amanda Mumford, the officer previously responsible for CID days. Amanda said that the format for that particular day was emailed to Cllrs on the 27 th July 2021 and no concerns were raised. Notwithstanding this, she apologised to any Cllr who felt that the format was not appropriate; additionally, the new officer (Sandra Campbell) has been notified of the concerns and will work to ensure that there is no confusion moving forwards.
Minute 21 7th Sept 21 Police Update	Enquiries should be made with the police to ascertain what plans they had to tackle the problem and dangers posed by motorised scooters in the borough.	The Met's Roads and Transport Policing Command continues to conduct operations across the capital to engage with e-scooter users, taking enforcement action where necessary. Those found riding a private e-scooter could lose six points on their current or future driver's licence and be fined up to £300.
Minute 24 7th September Work Programme	It was agreed that a report from the new Task and Finish Group would be presented to the Committee in November	This report has been produced, see minute 12

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REPORTING PERIOD Oct 20 to Sept 21

RAG Tolerance <=0% Green >=5% Amber >5% Red

	Rolling 12 Months	2020	2021	Difference	% Difference	RAG
	MOPAC High Harm London Wide Priorities					
Domestic Abuse		3050	2617	-433	-14%	●
Total Sexual Offences		511	527	16	3%	●
Knife Crime Offences		264	169	-95	-36%	●
Gun Crime Offences		56	29	-27	-48%	●
Race Hate Crime offences		500	582	82	16%	●
Bromley High Volume Local Priorities						
Non -Domestic Abuse with Inju		1368	1327	-41	-3%	●
Total Burglary Offences		1992	1473	-519	-26%	●
Bromley Local Priority						
Theft of MV		962	987	25	3%	●
Miscellaneous Data						
Total Notifiable Offences		22877	21752	-1125	-5%	●
ASB Calls		11851	9576	-2275	-19%	●
Totals		43431	39039	-4392	-10%	●
Satisfaction and Perception Data						
RAG Tolerance <=50% Red >=69% Amber >70% Green						
Local police Activities over last 12 months		54%	51%		-3%	●
Agrees Police listen to concerns		73%	71%		-2%	●
Agree Police can be relied upon to be there when needed		72%	64%		-8%	●
Agree Police treat all fairly		84%	71%		-13%	●
Agree Police deal with things that matter to this community		69%	67%		-2%	●
Knows how to contact Ward Officer		22%	28%		6%	●

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Report No: FS20125																			
Outcome	PORTFOLIO PLAN INDICATOR	DESCRIPTION	2019-20 TARGET	2019-20 ACTUAL	2020-21 TARGET	2020-21 ACTUAL	WHAT DOES GOOD PERFORMANCE LOOK LIKE?	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	2021-22 Year End Projection	2021-22 TARGET	2021-22 RAG STATUS	RAG Threshold	COMMENTARY (BY EXCEPTION)	
1: We will keep Bromley safe	1A	Number of Community Impact Days	12	12	12	12	HIGH	1	1	1	1	1	1	12	12	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above		
	1B	Number of meetings attended (COVID-19 Board Meetings)	N/A	N/A	New KPI 21/22	New KPI 21/22	HIGH	100%	100%	100%	100%	N/A	N/A	100%	100%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	All COVID-19 meetings attended. As restrictions have lifted, this indicator will cease.	
2: We will protect consumers	2A	Number of awareness raising events & training to groups & partners (No.)	70	72	70	5	HIGH	0	2	3	0	0	4	20	20	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	Over the past few weeks, the team have been getting requests to attend face to face gatherings of community groups, so the team expect to see an increase in events throughout the remainder of this year. However, the team will not reach the original annual target (70) which is a direct result of the pandemic. Currently there are 19 talks booked for the year up until the 31st March 2022.	
	2B	Rapid Response interventions responded to within 2 hours (%)	100%	100%	100%	100%	HIGH	1 (100%)	1 (100%)	4 (100%)	6 (100%)	5 (100%)	2 (100%)	100%	100%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	Challenge 25 test purchasing will take place on 22nd October which will be followed by under age test purchasing where there are failures.	
	2C	Compliance with Challenge 25 test purchase operations to detect the sale of age restricted products (No.)	100	97	100	100	HIGH	0	0	2	0	0	0	20	20	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above		
3: We will support and regulate businesses	3A	Inspections of high-risk food hygiene business undertaken (%) (Risk A and B food premises)	100% (A) 100% (B)	100% Risk A (3/3) 96% Risk B (107/111)	% to be determined by the FSA due to COVID-19	Annual Risk A - 1 Risk B 37	HIGH	N/A	N/A	N/A	N/A	N/A	N/A	Risk A - 1 out of 1 - 100% Risk B - 26 out of 37 - 70%	100%	N/A	RED	Red: more than 10% Amber: Within 10% Green: At target or above	For 3A to 3C As a result of FSA guidance, physical inspections stopped, and they required officers to lead on work relating to advice, education. This enabled the work area to focus on the Covid-19 response and meant that the usual statutory requirements in relation to food hygiene inspections were amended on an ongoing basis as the year progressed. As a result of the hiatus in inspections, there is now a backlog, and in response the FSA have produced a Recovery Plan (RP) which sets out the FSA's guidance and advice to local authorities for the period from 1 July 2021 to 2023/24, as they recognise that Councils may not be able to address the backlog and the inspections due within year. The Food Safety Plan (FSP) has been produced, and this provides the roadmap for how the due and overdue inspections will be delivered.
	3B	Due Food Hygiene Interventions Completed (%)	N/A	New KPI 20/21	% to be determined by the FSA due to COVID-19	Annual All FH - 588	HIGH	N/A	N/A	N/A	N/A	N/A	N/A	All FH - 196 out of 612 - 32%	100%	% to be determined by the FSA due to COVID-19	RED	Red: more than 10% Amber: Within 10% Green: At target or above	3A: There is 1 Cat A premises outstanding for inspection, and 37 Cat B premises that are due to be inspected this year. In accordance with the FSP it is anticipated that the backlog of Cat B premises that require an inspection will be completed by March 2022. 3B: There are 612 due inspections (Cat C to E) due this year. In accordance with the FSP it is anticipated that 100% of the due hygiene inspections (Cat C-D) will be completed by March 2022. Despite additional resources being provided, staffing levels within the team remain an issue due to the national shortage of food safety officers. The team currently (October 2021) has vacancies due to three officers taking retirement in the past 4 months including the manager, and one officer who is leaving the team to take a job with the City of Westminster on the 15th of October 2021. The team are currently in the process of recruiting officers to fill these vacant posts. So far one new full time permanent food safety officer has been recruited and started work on the 11th of October 2021.
	3C	Due Food Standards Interventions Completed (%)	N/A	New KPI 20/21	% to be determined by the FSA due to COVID-19	Annual All FS - 162	HIGH	N/A	N/A	N/A	N/A	N/A	N/A	All FS - 123 out of 162 - 76%	100%	% to be determined by the FSA due to COVID-19	RED	Red: more than 10% Amber: Within 10% Green: At target or above	3C: Where possible Food Standards Interventions will be carried out at the same time as Food Hygiene Interventions. In accordance with the FSP it is anticipated that 100% of the due Food Standards inspections will be completed by March 2022.
	3D	Respond to 70% of complaints/enquiries about food and food premises within 5 working days (%)	80%	86%	70.00%	90%	HIGH	89% (40 out of 45)	90% (40 out of 44)	85% (52 out of 61)	73% (29 out of 40)	77% (23 out of 30)	77% (23 out of 30)	97% (32 out of 33)	85%	70%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
	3E	COVID-19 Educate – respond to business advice request within 7 working days	N/A	N/A	New KPI 21/22	New KPI 21/22	HIGH	76%	84%	85%	90%	90%	No complaints received	No Complaints received	90%	90%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	

Outcome	PORTFOLIO PLAN INDICATOR	DESCRIPTION	2019-20 TARGET	2019-20 ACTUAL	2020-21 TARGET	2020-21 ACTUAL	WHAT DOES GOOD PERFORMANCE LOOK LIKE?	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	2021-22 Year End Projection	2021-22 TARGET	2021-22 RAG STATUS	RAG Threshold	COMMENTARY (BY EXCEPTION)
	4A	Comply with 100% of CCTV Evidence Requests (%)	100%	100%	100%	100%	HIGH	100%	100%	100%	100%	100%	100%	100%	100%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
	4B	Serve statutory notices where appropriate (nuisance and pollution) (%) outcome based	100%	100%	N/A	100%	OUTCOME	100% (6)	100% (3)	100% (2)	100% (4)	100% (4)	100% (8)	100%	N/A	OUTCOME	Red: more than 10% Amber: Within 10% Green: At target or above	
	4C	Cases where investigations of breaches of planning control are completed (%)	100%	96%	N/A	100%	OUTCOME	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	N/A	N/A	OUTCOME	Awaiting Data	
	4D	Issue HMO licenses where valid applications are received (%)	75%	45%	100%	17.6% (3 out of 17)	HIGH	100% (12 out of 12)	100% (6 out of 6)	100% (6 out of 6)	100% (4 out of 4)	100% (2 out of 2)	100% (1 of 1)	100%	100%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	Previously this showed as a Red Rag, as HMO licensing inspections were impacted due to Covid-19 restrictions, this in turn delayed licence applications being validated and limited the number of licences being issued. A recent change in procedure to allow licence applications to be validated and licences to be issued without prior inspection (as permitted in law). This has reduced the delays and increased the number of licences being issued. Notwithstanding this, additional issues are occurring in real time, as the external contractors relied upon by landlords (e.g. gas compliance) have been unavailable. As such, some applications had been submitted incomplete. As this indicator relies on complete applications to be valid, the risk has reverted back to green.
	4E	Total Number of Fly-tipping incidents (No.)	3000	3123	N/A	3565	OUTCOME	303	286	324	321	353	323	3820	N/A	OUTCOME	N/A	
	4F	Total Number of open fly-tipping incident investigations (No.)	N/A	New KPI will be reported from November 2020 onwards	N/A	42 (open for period April to March)	OUTCOME	13 (open for period April only)	21 (open for period April to May)	40 (open for period April to June)	41 (open for period April to July)	42 (open for period April to August)	30 (open for period April to September)	N/A	N/A	OUTCOME	N/A	4F this will be an open indicator, in that it will monthly update on the number of open fly-tipping incidents investigations in the system - this because investigations can take longer than one month and action maybe ongoing. To allow for comparison of data with previous and future years it is proposed this indicator is given a set time period of the financial year - i.e. the number of open cases in the system which were commenced between April and March.
0	4G	Fly-tipping % of closed cases where action has been taken (those where evidence was available) (%)	N/A	New KPI will be reported from November 2020 onwards	75%	16% (136 cases closed after investigation for April to March of 136 cases 22 have had action which is the 16%)	OUTCOME	91% (12 cases closed after investigation for April, of 12 cases 11 have had action taken which is 91%)	92% (28 cases closed after investigation for April to May, of 28 cases 26 have had action taken which is 92%)	60% (43 cases closed after investigation for April to June, of 43 cases 26 have had action taken which is 60%)	58% (57 cases closed after investigation for April to July, of 57 cases 33 have had action taken which is 58%)	54% (77 cases closed after investigation for April to August, of 77 cases 42 have had action taken which is 54%)	35% (122 cases closed after investigation for April to September, of 122 cases 43 have had action taken which is 35%)	50%	50%	OUTCOME	N/A	4G will be a monthly update of the % of cases closed from the same set time period of 4H where evidence was available and action has been taken. 4G for April shows 11 cases where actions have taken and this includes 9 warning letters, 1 Fixed penalty notice (FPN) and 1 prosecution. The prosecution resulted in a fine. In May there was a total of 15 cases where actions had been taken and they were 11 warning letters and 4 FPNs. In June the cumulative number remained at 26 cases where action had been taken. In July the total number of cases where action had taken was 7. This was 6 warning letters and 1 FNP. In August the total number of cases where action had been taken was 9. This was 7 warning letters and 2 FPNs. In September the total number of cases where action had been taken was 1. This was 1 warning letter. The cumulative total is 43, 11 (April), 15 (May), remained the same in June, 7 (July), 9 (August) and 1 (September).
	4H	Parking appeals heard by the Environment and Traffic Adjudicators (ETA) against PCNs issued by LBB (No.)	300	112	200	178	LOW	17	7	16	17	25	17	198	200	GREEN	Red: More than 250 Amber: More than 225 Green: Up to 225	This target will need to be revisited following the commencement of enforcement of Moving Traffic Contraventions in September as many more PCNs can be expected. This will take a couple of months for the MTC PCNs to process to this stage of appeal.
	4I	Parking ETA cases won by LBB (% of cases heard)	80%	74%	75%	68%	HIGH	76%	86%	94%	76%	76%	100%	85%	75%	GREEN	Red: Less than 65% Amber: Less than 70% Green: At target or above	Cases are reviewed monthly to ensure best practices are being followed. Any concerns are reported back to the CEOs or Council officers to resolve at the early stages on any future appeals of a similar nature.
	4J	COVID-19 Official Controls and Enforcement – serve statutory notices where appropriate with regard to 4 E's (Engage, Explain, Encourage, Enforce) model and LBB enforcement policy	N/A	N/A	100%	New KPI 21/22	OUTCOME	100% (16 out of 16)	100% (10 out of 10)	100% (9 out of 9)	N/A (0 out of 0)	N/A (0 out of 0)	N/A (0 out of 0)	100%	100%	OUTCOME	Red: More than 10% Amber: Within 10% Green: At target or above	Further visits identified non-compliance with pavement licences. Those premises who were issued with warning for social distancing issues were all compliant. All of the businesses in Beckenham High Street are now compliant with regards to pavement licences. All covid regulations (apart from Directions) have been repealed.

Report No.
FSD21069

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO HOLDER

Date: Wednesday 10 November 2021

Decision Type: Non-Urgent Executive Non-Key

Title: BUDGET MONITORING 2021/22

Contact Officer: Keith Lazarus, Head of Finance ECS & Corporate
E-mail: keith.lazarus@bromley.gov.uk

Chief Officer: Director of Environment and Public Protection

Ward: (All Wards);

1. Reason for report

This report provides an update of the latest revenue budget monitoring position for 2021/22 for the Public Protection & Enforcement Portfolio, based on expenditure and activity levels up to 30 September 2021.

2. **RECOMMENDATION(S)**

The Public Protection & Enforcement Portfolio Holder is requested to:

2.1 Endorse the latest revenue budget monitoring for the Public Protection & Enforcement Portfolio.

Impact on Vulnerable Adults and Children

1. Summary of Impact: None directly from this report
-

Corporate Policy

1. Policy Status: Sound financial management
 2. BBB Priority: Excellent Council Quality Environment Safe Bromley
-

Financial

1. Cost of proposal: Not Applicable
 2. Ongoing costs: Not Applicable
 3. Budget head/performance centre: Public Protection & Enforcement Portfolio Budgets
 4. Total current budget for this head: £2.5m
 5. Source of funding: Controllable revenue budgets 2021/22
-

Personnel

1. Number of staff (current and additional):48.3fte
 2. If from existing staff resources, number of staff hours:
-

Legal

1. Legal Requirement: Statutory Requirement The statutory duties relating to financial reporting are covered within the Local Government Act 1972; the Local Government Finance Act 1998; the Accounts and Audit Regulations 1996; the Local Government Act 2000 and the Local Government Act 2002
 2. Call-in: Applicable
-

Procurement

1. Summary of Procurement Implications: N/A
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): The services covered in this report affect all Council Taxpayers, Business Ratepayers, those who owe general income to the Council, all staff, Members and Pensioners.
-

Ward Councillor Views

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

3. COMMENTARY

- 3.1 This report sets out the results of the latest quarterly revenue budget monitoring exercise for the 2021/22 financial year for the Public Protection & Enforcement Portfolio based on financial information available as at 30th September 2021.
- 3.2 This updated position for the Portfolio still shows no overall projected variation based on latest financial information available. It should be noted that monitoring this year now takes into account any ongoing impact of Covid-19 on the Portfolio's budgets, and an indicative allocation of Covid-19 grant funding towards costs or loss of income primarily resulting from the continuing impact of Covid-19 on services. Excluding the application of this anticipated grant funding, the projected overspend would be £175k.
- 3.3 The projected outturn is detailed in Appendix 1A, which shows the forecast spend for each division within the Portfolio compared to the latest approved budget. Whilst the Portfolio's overall budget is projected to be in balance, there are a number of offsetting variations within this as summarised in the table below:

	£'000
Staffing Costs:	
• Community Safety	Dr 25
• Emergency Planning	Dr 14
• Public Protection	Cr 33
Supplies & Services	Dr 85
Contract costs	Cr 47
Income	Cr 69
Mortuary & Coroners Service	Dr 200
Sub total	Dr 175
Indicative allocation of Covid-19 grant funding	Cr 175
Total Variation	-

- 3.4 Appendix 1B provides further detail and commentary on each of the projected variations within each service.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

None directly from this report.

5. POLICY IMPLICATIONS

- 5.1 To meet the ambitions for residents, the Council must use available resources deploy its workforce wisely. This is reflected in the "Making Bromley Even Better" ambition of Service Efficiency - 'To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents'.

- 5.2 The “2021/22 Council Tax” report highlighted the financial pressures facing the Council. It remains imperative that strict budgetary control continues to be exercised to minimise the risk of compounding financial pressures in future years.
- 5.3 Chief Officers and Departmental Heads of Finance are continuing to place emphasis on the need for strict compliance with the Council’s budgetary control and monitoring arrangements.

6. COMMENTS FROM THE DIRECTOR OF ENVIRONMENT & PUBLIC PROTECTION

- 6.1 The Public Protection and Enforcement Portfolio has had to meet the unbudgeted costs of the Council's contribution to London-wide emergency mortuary provision, although the contribution this year will now be lower than expected. During 2020/21 there was also an impact on the Council's own services due to the impact of an increased number of Covid-19 deaths on the costs of the Coroners and mortuary services, together with an expected reduction in income from public protection services. These pressures are now manifesting in 2021/22 with additional costs projected for the year. This situation would be exacerbated if there were further increases in infections especially over the winter period.
- 6.2 Any high-profile inquests or significant increase in volume of cases could increase the cost of the Coroner's service. There is also still some uncertainty with regard to the Coroners core costs for 2021/22.
- 6.3 The provision of a sustainable mortuary service at an affordable cost in the long term is problematic due to variables in demand and a very limited market with little competition.

7. FINANCIAL IMPLICATIONS

- 7.1 A detailed breakdown of the projected outturn by service area is shown in Appendix 1A with explanatory notes in Appendix 1B.
- 7.2 Overall, no variation is projected to the year-end based on the information available for the first quarter of the year, which is inclusive of indicative Covid-19 grant funding of £175k.

Non-Applicable Sections:	Legal, Personnel & Procurement Implications
Background Documents: (Access via Contact Officer)	2021/22 budget monitoring files within E&CS Finance section

Public Protection & Enforcement Budget Monitoring Summary

2020/21 Actuals £'000	Service Areas	2021/22 Original Budget £'000	2021/22 Latest Approved £'000	2021/22 Projected Outturn £'000	Variation £'000	Notes	Variation Last Reported £'000	Full Year Effect £'000
	Public Protection							
370	Community Safety	401	408	394	Cr 14	1	0	0
137	Emergency Planning	141	141	160	19	2	0	0
574	Mortuary & Coroners Service	580	580	780	200	3	469	0
1,457	Public Protection	1,414	1,407	1,377	Cr 30	4	0	0
	COVID grants	0	0	Cr 175	Cr 175		Cr 469	0
2,538	TOTAL CONTROLLABLE	2,536	2,536	2,536	0		0	0
379	TOTAL NON CONTROLLABLE	6	6	6	0		0	0
928	TOTAL EXCLUDED RECHARGES	810	810	810	0		0	0
3,845	PORTFOLIO TOTAL	3,352	3,352	3,352	0		0	0

Reconciliation of Latest Approved Budget **£'000**

Original Budget 2021/22 **3,352**

Carry Forward Requests approved from 2020/21

Asset Recovery Incentivisation Scheme Expenditure		48
Asset Recovery Incentivisation Scheme Income	Cr	48
MOPAC Grant Expenditure		28
MOPAC Grant Income	Cr	28

Latest Approved Budget for 2021/22 **3,352**

REASONS FOR VARIATIONS**1. Community Safety Cr £14k**

Salaries are projected to overspend by £25k due to agency cover of staff maternity leave. This is offset by a £47k underspend relating to kennel fees in line with prior years. There are other small variations within supplies and services totalling a £8k overspend.

2. Emergency Planning Dr £19k

Salaries are expected to overspend by £14k due to additional and ongoing on-call costs. There will be £10k of expenditure incurred for the purchase of new software for a Council-wide Emergency Notification system, but there are other minor variations within supplies and services resulting in a small £5k underspend.

3. Mortuary & Coroners Service Dr £200k

Additional expenditure of £67k has been incurred so far this financial year. This relates to the pan London shared costs for the additional emergency mortuary provision put in place as a result of COVID-19. Since April 2020, the total cost to LBB has been £1.47m, with £469k relating to 2021/22. However, Bromley have since been notified of a partial refund of £402k, reducing the figure to a total of £1.07m, with £67k relating to 2021/22. Further COVID-related mortuary costs in the Borough are anticipated this winter resulting in a further £84k of overspend. Coroners costs are forecast to exceed budget by £49k according to the latest projected expenditure figures provided by the Consortium.

4. Public Protection Cr £30k

Staffing is projected to underspend by £63k. There are a number of vacancies to be filled and also part time employees in some full time posts. However this will be partly offset by £30k of IT consultancy costs due to a joint project to be undertaken with Planning to review Uniform with a view to replacing this system.

There is an additional expenditure of £20k for the purchase of new computer equipment including screens and keyboards. Costs of £20k will also be incurred relating to BT project management costs for the design of online payments and forms, and there is a further cost of £21k for software licenses. These are one-off project costs which should not reoccur next financial.

Houses in Multiple Occupation income is projected to overachieve by £62k and this will be used to fund project costs of £41k relating to investigations of unlicensed properties, as well as offsetting the £21k of BT project costs detailed above.

There is £20k of income anticipated relating to letting agency income. New legislation allows for penalty payments to be raised against letting agents who are not meeting statutory conditions. The extent to which this is a recurring income stream will be monitored. There is also grant income of £11k to fund food safety officers to educate businesses about food cross contamination. Related costs are reflected in the staffing variation

License income has not recovered fully due to the number of businesses ceasing to trade during COVID lockdown restrictions. It is anticipated that this financial year there will be a £24k shortfall in income achieved through this stream.

There are a number of small variations across supplies and services forecast totalling a further £30k underspend this financial year.

Waiver of Financial Regulations:

The Council's Contract Procedure Rules state that where the value of a contract exceeds £50k and is to be exempt from the normal requirement to obtain competitive quotations the Chief Officer has to obtain the agreement of the Director of Corporate Services, the Director of Finance and the Director of Commissioning and (where over £100,000) approval of the Portfolio Holder and report use of this exemption to Audit Sub committee bi-annually. Since the last report to the Executive, no waivers over £50k have been actioned.

Virements Approved to date under Director's Delegated Powers

Details of virements actioned by Chief Officers under delegated authority under the Financial Regulations "Scheme of Virement" will be included in financial monitoring reports to the Portfolio Holder. Since the last report to Executive, no virements have been actioned.

Report No
ES20137

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: PUBLIC PROTECTION AND ENFORCEMENT POLICY
DEVELOPMENT AND SCRUTINY COMMITTEE

Date: Wednesday 10 November 2021

Decision Type: Non-Urgent Executive Non-Key

Title: THE DRAFT PROTOCOL FOR SCRUTINY OF THE SAFER
BROMLEY PARTNERSHIP

Contact Officer: Joanne Stowell, Assistant Director of Public Protection
Tel: 020 8313 4332 E-mail: Joanne.Stowell@bromley.gov.uk

Chief Officer: Director of Environment and Public Protection

Ward: (All Wards);

1. Reason for report

- 1.1 Crime and Disorder Reduction Partnerships (CDRPs) were created by the Crime and Disorder Act 1998 to develop and implement strategies to reduce crime and disorder. These partnerships are now generally known as Community Safety Partnerships (CSP); within Bromley, the partnership is known as the Safer Bromley Partnership (SBP). The Safer Bromley Partnership Board (SBPB) provides the governance and the Safer Bromley Partnership Strategy (SBPS) is the strategic framework document that links the partners' aims and outcomes.
- 1.2 Section 19, 20 and 21 of the Police and Justice Act 2006 (the Act) requires every local authority to have a crime and disorder committee (CDC) with the power to review or scrutinise the work of CSPs. In Bromley, the Public Protection and Enforcement Policy Development & Scrutiny Committee (PP&E PDS) has been designated as the CDC for this purpose.
- 1.3 The purpose of this report is to present an agreed protocol to determine how the PP&E PDS will formally scrutinise the SBP and its partners, in accordance with set guidance for scrutiny, and with a view to facilitating good working relationships throughout, and via the scrutiny process

2. RECOMMENDATION(S)

That the Chairman of the PP&E PDS Committee in his role as the Chairman of the relevant Crime and Disorder Committee:

- 2.1 Agrees the draft protocol attached as Appendix B, the associated workplan and the Police data package (Appendices 1 and 2 within Appendix B).

- 2.2 Agrees that delegated authority be given to the joint Chairmen of the Safer Bromley Partnership Board, in consultation with the Portfolio Holder for Public Protection and Enforcement, to make minor amendments to the protocol if required.

Impact on Vulnerable Adults and Children

1. Summary of Impact: There is a statutory requirement for the council to ensure that its overview and scrutiny structures include the ability to scrutinise the work of the SBP and the associated SBP strategy. The 4 priorities within the strategy cover both high-harm crimes and high-volume crimes. A focus on safeguarding and collegiate working is embedded throughout, to protect vulnerable adults and children and to ensure that partner organisations work together, to share the skills, data, powers and resources collectively available to them to maximise beneficial outcomes.

Corporate Policy

1. Policy Status: Not Applicable:
2. BBB Priority: Children and Young People Excellent Council Quality Environment Safe Bromley
1. Cost of proposal: Estimated Cost No Cost Not Applicable: Further Details
2. Ongoing costs: Not Applicable:
3. Budget head/performance centre: Not Applicable
4. Total current budget for this head: Not Applicable
5. Source of funding: Not Applicable

Personnel

1. Number of staff (current and additional): Not Applicable
2. If from existing staff resources, number of staff hours: Not Applicable

Legal

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

Procurement

1. Summary of Procurement Implications: Not Applicable

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Borough Wide

Ward Councillor Views

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

3. COMMENTARY

THE PP&E PDS SCRUTINY ROLES AS A CDC

- 3.1 Every local authority must have a CDC with the power to review and scrutinise the decisions or actions taken by the SBP. This is to facilitate the discharge, by the responsible authorities, of their crime and disorder functions, however, the CDC does not have decision making powers. The PP&E PDS (in addition to its other responsibilities), is the Council's CDC designated to scrutinise the SBP, and review delivery against the agreed priorities of the Safer Bromley Partnership Strategy (SBPS).
- 3.2 The role of the CDC is to:
 - Meet annually as a minimum (statutory)
 - Act as a critical friend, providing constructive challenge at a strategic level, rather than adversarial fault-finding at an operational/tactical level
 - Focus on the entire partnership, (if issues arise that relate specifically to a particular partner agency, it is more appropriate to refer such issues to the governing body/s of that organisation)
 - Scrutinise partners only "in so far as their activities relate to the partnership itself". For the avoidance of doubt, the CDC should not extend to the separate statutory functions of the partner bodies, nor should it entail scrutiny of individual cases
 - When necessary, to make reports and/or recommendations to the Council, with respect to the SBPs discharge of its crime and disorder functions
 - Consider the Councillor Call for Actions (CCfAs), that arise through the Council's CCfAs process that relate to crime and disorder matters.
- 3.3 Guidance suggests that a protocol be developed to lay down the mutual expectations of partners and scrutiny members, to help make sure that scrutiny is both constructive and effective; currently there is no agreed protocol in place.
- 3.4 Currently, the PP&E PDS exercises its function as the CDC at every committee; Police leadership representatives from the South Borough Command Unit (BCU) attend each committee (5 times a year). In addition to this, they also attend the quarterly SBPB, and various strategic and operational Youth Offending Services (YOS) Board meetings. At each PP&E PDS the Police present a report on crime data; the format and content of this data package has flexed over time, and currently does not fully reflect the required strategic data for consideration by the committee. On occasion, the requests for crime data exceed that which the committee can legitimately scrutinise. In addition, the analysts previously available to the Police locally have again, been moved back to the centre. As a result, the extended data packages are currently provided by operational police personnel. As the data sets can exceed what is required and readily available, the preparation of the data is time consuming and results in operational resources being diverted away from their primary purpose. In comparison, the BCU is scrutinised by Croydon and Sutton once a year, and both boroughs employ their own analysts.

TASK AND FINISH GROUP

- 3.5 On the 21st September 21 the PP&E PDS Chairman required that a cross party Task and Finish group be convened, to be chaired by the Vice Chairman Cllr Colin Hutchins. The aims of the group were to:

- Produce a draft protocol, for approval, that sets out how the SBP will be scrutinised
- Produce a suggested workplan that invites statutory partners to present their work for scrutiny throughout the year
- Agree a 'fit for purpose' data package, that replicates the performance report that MOPAC presents for monitoring progress against the Police and Crime Plan, and that reduces the use of Police resources.

3.6 In discussion, the members of the Task and Finish Group recognised that the golden thread between the SBPB, the SBPS, the Safer Neighbourhood Boards (SNB) and Ward Panels was not always clearly understood. This has led to operational ward issues being discussed at the PP&E PDS committee, whereas the appropriate forum would have been the SNB. As a result, Appendix A has been produced to provide context as to the links and differences between the SBPB (and the associated strategy) and the SNB. An education piece will be developed and delivered to Members by March 2022 by the Chairman of the SNB, with periodic refreshers provided moving forwards.

DRAFT PROTOCOL

3.7 Following consideration of the formal scrutiny role of the PP&E PDS in relation to the SBP, the Task and Finish group agreed upon the draft protocol presented as Appendix B, together with a commitment to develop a workplan to scrutinise partners as a whole (Appendix 1 within Appendix B), and a police data package (Appendix 2 within Appendix B). This draft protocol sets out the arrangements sought to formalise and strengthen the scrutiny process. The draft protocol presents the following:

- The scrutiny arrangements
- The work programme
- Attendance from partners
- The South BCU data package

DIFFERENCES BETWEEN PRPSED AND CURRENT ARRANGEMENTS

3.8 Should the draft protocol be approved, the CDC would still effectively convene 5 times a year at each committee, however, the future scrutiny arrangements will differ from those currently in place in the following ways:

- A workplan will be developed for partners, that seeks to scrutinise the whole partnership (see Appendix 1 within Appendix B)
- A fit for purpose data package commensurate with the MOPAC High Harm London Wide Priorities (HHLWP), and High-Volume Local Priorities (HVLP), will be produced as a stand-alone document at each committee (see Appendix 2 within Appendix B)
- The Police will reduce their attendance to the beginning/end of the year, where they will report on their aims and objectives, achievements and performance, and progress on identified areas for improvement.

3.9 Notwithstanding the above, and although not a formal requirement of the scrutiny process, the PP&E PDS will continue to receive the draft minutes from each SBPB, as well as an end of year report, all of which will contain Police crime data along with partner actions, updates and outcomes.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 Summary of Impact: There is a statutory requirement for the council to ensure that its overview and scrutiny structures include the ability to scrutinise the work of the Safer Bromley Partnership and the associated SBP strategy. The 4 priorities within the strategy cover both high-harm crimes and high-volume crimes. A focus on safeguarding and collegiate working is embedded throughout, to protect vulnerable adults and children and to ensure that partner organisations work together, to share the skills, data, powers and resources collectively available to maximise beneficial outcomes.

5. LEGAL IMPLICATIONS

5.1 Section 19, 20 and 21 of the Police and Justice Act 2006 (the Act) requires every local authority to have a Crime and Disorder Committee (CDC) with the power to review and scrutinise the work of CSPs. In Bromley, the Public Protection and Enforcement PDS Scrutiny Committee has been designated as the CDC for this purpose.

5.2 Good practice requires a Protocol for the discharge of the Committee's functions, which in turn clarifies which information is required to be shared, all of which must be compliant with the Data Protection Act 2018 and any data Sharing Protocols.

Non-Applicable Sections:	Policy Implications, Financial Implications, Personnel Implications, Procurement Implications
Background Documents: (Access via Contact Officer)	

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Appendix A – The Links and Differences

1. COMMUNITY SAFETY PARTNERSHIPS

1.1 Crime and Disorder Reduction Partnerships (CDRPs) were created by the Crime and Disorder Act 1998 to develop and implement strategies to reduce crime and disorder. These partnerships are now generally known as Community Safety Partnerships (CSP), in Bromley this partnership is known as the Safer Bromley Partnership (SBP).

1.2 This partnership exists to ensure that a number of prescribed 'responsible authorities' work together to jointly agree and deliver community safety priorities as agreed by MOPAC. The responsible authorities are:

- The Local Authority
- The South Borough Command Unit (BCU)
- The London Fire Brigade (LFB)
- The London Ambulance Service (LAS)
- The Clinical Care Group (CCG)
- The London Probation Service (LPS)

Other partners can also sit on the SBP, however, the above core membership is the same for every Community Safety Partnership.

2. THE COUNCIL'S COMMUNITY SAFETY PRIORITIES

2.1 The work of CSPs in London is determined by MOPAC, via the Police and Crime Plan, and the responsible authorities must have regard to the objectives set out in that plan. The plan contains high harm crime London wide priorities (HHLWP) priorities and high-volume local crime priorities (HVLP).

2.2 All Local Authorities are required to have Anti-social Behaviour (ASB) as a HVLP, the other high volume crime types within this category are as follows:

- Non-domestic abuse violence with injury (NDAVWI)
- Total robbery
- Total burglary
- Total theft person
- Theft taking of a Motor Vehicle (MV)
- Theft taking from a MV

2.3 Of the above, each Local Authority chooses 2 to 4 HVLP as suggested by MOPAC and Met Police data. For Bromley the 4 priorities are:

1. NDAWI
2. Total Burglary
3. Taking of MV (as a locally agreed priority rated as important by the public) and
4. ASB (mandatory)

2.4 In addition to HVLP, there are 3 HHLWP applied to all London Boroughs, these are:

1. Reducing Violence Against Women and Girls
2. Keeping Young People Safe, and
3. Standing Together Against Hate and Extremism

2.5 These MOPAC priorities are reflected within the BCU work streams and direct the work direction of the SBP as a whole. MOPAC does not set specific targets for the above priorities, the only requirements in place are that:

1. Crime is reduced
2. Public perception of the service is good (community confidence)

THE REQUIREMENTS OF THE SBP

3. The SBP as a CDRP is required to do the following:

1. Prepare a local plan and strategy, laying out the approach for addressing those local priorities at a borough level (Safer Bromley Partnership Strategy (SBPS));
2. Produce an annual crime needs strategic assessment
3. Share information among the responsible authorities within the CDRP
4. Track progress against the agreed strategy and plan

3.1 There is no requirement to produce an annual report for scrutiny, however, the SBPB produces an end of year update that effectively demonstrates progress against the strategic aims and plan objectives.

4. THE SAFER BROMLEY PARTNERSHIP STRATEGY (SBPS)

4.1 The SBPS has 4 priorities which are matched to the HHLWP and HVLP within the Police and Crime Plan. These are listed in paragraphs 2.3 and 2.4 above.

5. SAFER NEIGHBOURHOOD BOARDS (SNB) AND WARD PANELS

5.1 SNBs are in place in every London Borough, bringing police and communities together to decide local policing and crime priorities, solve problems collaboratively and make sure that the public are involved in a wide range of community safety decisions.

5.2 MOPAC made £1m available, for Safer Neighbourhood Boards to bid to fund projects that will help cut neighbourhood crimes and boost public confidence. SNBs have driven forward 200 crime reduction projects across the city using this funding.

5.3 The SNB is the primary mechanism for local borough and ward engagement, and as such has 7 specific functions:

1. Establish policing priorities in the borough
2. Monitor crime performance and community confidence
3. Monitor complaints against officers
4. Hear and monitor complaints from victims of crime
5. Provide assurance that a system of independent custody visiting is delivered,
6. Play a significant role in community payback, and
7. Ensure all wards have a panel

5.4 At the SNB the data presented is at borough level to enable strategic proprieties to be considered. At the Chair's meeting and panel meetings the data presented is at ward level. At Board level the information and data are currently used to agree funding for relevant projects, however, the SNB structure is under review and the focus is moving to the new engagement panels and to stop and search.

5.5 Ward Panels create a mechanism for local consultation and ensure that the work of each Safer Neighbourhood Team (SNT) maintains focus on resolving local problems by involving local

people in the process of prioritising the concerns of the community Communities also can benefit from an increased understanding of Policing issues within the ward, which should encourage public support and confidence in their local police.

6. THE DIFFERENCE BETWEEN THE SBPB AND THE SNB

- 6.1 The SBPB is concerned with Community Safety in the broadest sense, whereby it is understood to mean people going about their daily lives in safety. Tackling crime is only one element, as improving Community Safety in its broadest sense is about local partners working together to keep everyone safer. This includes crime prevention; early intervention; enforcement; reducing reoffending; and tackling key drivers of crime such as alcohol/drug misuse and social exclusion. All of these elements are on an equal footing, and the partnership is not crime centric, whereas the SNB is. Moreover, the SBP works strategically, at borough level, whereas the SNB works operationally/tactically at area and ward level.
- 6.2 The SBPB receives and considers data at a borough level from all statutory partners, whereas the SNB specifically monitors crime performance and community confidence at a local level . Notwithstanding the above, when measuring performance, the SBPB utilises the same data as MOPAC, and as such presents data in a similar way to MOPAC to enable effective comparisons when monitoring progress.

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Appendix B – Draft Scrutiny Protocol Between the Public Protection & Enforcement Policy Development & Scrutiny Committee (PP&EPDS) and the Safer Bromley Partnership (SBP)

1. Introduction & Purpose of Protocol

- 1.1 Provisions in the Police and Justice Act 2006 (the Act) introduced Crime and Disorder Reduction Partnerships (CDRPs), however, since 1st March 2010 the Home Office use the term Community Safety Partnerships (CSPs) in lieu of CDRPs. In Bromley, the Safer Bromley Partnership (SBP) is the borough's CSP.
- 1.2 Section 19, 20 and 21 of the Act extend the remit of local authorities to scrutinise crime and disorder functions. As a result, the Council is required to designate a Scrutiny Board to act as the Council's 'Crime and Disorder Committee' (CDC). The PP&E PDS has been assigned to fulfil this role.
- 1.3 The SBP has a Board (the Safer Bromley Partnership Board (SBPB)) that meets quarterly. Membership comprises a number of responsible authorities, these being:
- The Local Authority
 - The South Borough Command Unit (BCU)
 - The London Fire Brigade (LFB)
 - The London Ambulance Service (LAS)
 - The Clinical Care Group (CCG)
 - The London Probation Service (LPS)

Other partners can also sit on the SBP however, the above core membership is the same for every partnership.

- 1.3 The purpose of this protocol is to provide guidance and a common understanding on how scrutiny of crime and disorder operates within Bromley. This protocol has been shaped by associated Regulations, Guidance and good working practice. The protocol may be revised by agreement between the joint Chairmen of the SBPB and the Portfolio Holder for Public Protection & Enforcement, in order to continually improve the scrutiny process, however, the core aim is to ensure that Scrutiny remains a positive and challenging process.

2. Principles

- 2.1 Community safety is understood to mean people going about their daily lives in safety. Improving community safety is about tackling crime and disorder, but more widely about local partners working together, with local communities, to keep everyone safer. This includes: crime prevention; early intervention; enforcement; reducing reoffending; and tackling key drivers of crime such as alcohol/drug dependency and misuse, and social exclusion.
- 2.2 In its capacity as a CDC, the PP&E PDS Committee has powers to review and scrutinise decisions made and actions taken, in connection with the discharge by the 'responsible authorities', of their crime and disorder functions, however, it does not have decision making powers.

- 2.3 The role of scrutiny is to act as a critical friend to the SBP providing constructive challenge at a strategic level to the work of SBPB, and there are opportunities for:
- Enhanced dialogue with the partnership
 - Enhanced democratic accountability in respect of the community safety initiatives delivered in partnership
 - Reviewing delivery against the agreed priorities within the Safer Bromley Partnership Strategy (SBPS)
- 2.4 By making recommendations for improvement, the scrutiny contributes to achieving the shared aim of improving community safety in Bromley and may assist in areas such as:
- The integration of community safety with other strategies
 - Policy development
 - Overseeing and reviewing the delivery of joint responses on community safety issues
 - Creating a clearer link between partner agencies and the public on community safety
 - Understanding and increasing community confidence e.g. fear of crime or confidence in policing
- 2.5 Scrutiny is most likely to be successful and lead to outcomes that have a positive impact for local communities, if all parties to the community safety scrutiny process work co-operatively from the basis provided by this protocol, and by treating one another (and any occasional participants) with respect and courtesy. This co-operation involves a willingness to share knowledge, information, data and views, and to develop a shared mutual understanding of community safety in Bromley, as well as to carry out such duties as can reasonably be expected.

3. Scrutiny Arrangements

- 3.1 The PP&E PDS committee has a statutory duty to meet in its capacity as the crime and disorder scrutiny at least once a year, however in practice, scrutiny in this area will take place each time the committee convenes (currently 5 times a year) to:
- Scrutinise the work of the SBP as a whole, insofar as their activities relate to the SBP itself, by acting as a 'critical friend'. For the avoidance of doubt, scrutiny will not extend to the separate statutory functions of the partner bodies, nor will it entail scrutiny of individual cases, and if issues arise that relate specifically to a particular partner agency, such issues should be referred to the governing body/s of the relevant organisation
 - Review or scrutinise progress against the priorities within the SBPS
 - Review or scrutinise referred crime and disorder Councillor Calls for Action (CCFA)
 - Make reports or recommendations to a responsible authority or to a co-operating person or body as appropriate, in so far as they relate to the work of the partnership itself
 - Devise an annual work plan programme at the beginning of each financial year
- 3.2 The Committee will exclude any matters (save those raised via a CCFA) which pertain to local policing and crime priorities, including local data monitoring, as these will be referred to the Safer Neighbourhood Board and Ward Panels, as the primary borough-level mechanism for local engagement and consideration.

3.3 In its capacity as the CDC, the PP&E PDS remains subject to the requirements of the Council's Constitution including the Members' Code of Conduct.

4. The Work Programme

4.1 The PP&E PDS will undertake work programme planning at the beginning of each financial year. In doing so, Members are encouraged to prioritise for inclusion matters which relate to an identified priority within the SBPS. An example workplan is presented in Appendix 1.

4.2 They are also encouraged to consider the purpose and value of the proposed scrutiny activity, its timing, and whether there is the capacity and resources to undertake it.

4.3 The PP&E PDS as CDC will advise the SBPB in advance of any scrutiny review relating to a crime and disorder issue that they are intending to undertake, as part of its annual work programme, and will have regard to:

- The fit with other review processes such as the work of the South BCU/LFB/LAS/PCT and LPS in holding the respective partners/chief officers to account
- Regulatory and audit activity, and
- Any other ongoing scrutiny undertaken by other scrutiny boards – in particular, information will be sought from the relevant scrutiny boards that cover partner work and be shared with the PP&E PDS in their role as CDC, in order to avoid inappropriate duplication of scrutiny work.

5. Attendance at the PP&E PDS CDC

5.1 The CDC may require the attendance of an officer of a responsible authority or of a co-operating body to answer questions. Where reasonable notice of the intended date is given, the responsible authority or co-operating body will be obliged to attend. The responsible authority or co-operating body should ensure that officers attending the scrutiny meetings have the seniority and knowledge to answer the board's questions and that they are given appropriate support by their line managers and/or Chief Officers.

5.2 The PP&E PDS as CDC will give at least 4 weeks notice to responsible/cooperating authorities requesting their attendance at a scrutiny and overview meeting. Attendance requests will clearly outline the scope of the scrutiny exercise.

6. Co-opted Members

6.1 The Home Office guidance for the Scrutiny of Crime and Disorder Matters makes specific reference to the role of police authorities and emphasises the importance of ensuring that community safety scrutiny complement this role. On the occasions that policing items are being discussed, the South BCU will be invited to attend as a co-opted member for those specific items.

7. The South BCU Data Package

7.1 The data shall be presented in such a way that monitoring progress against the Police and Crime Plan can be tracked on a rolling 12-month basis. The data shall juxtapose high volume and high harm priorities against the associated crime categories and compare crime volumes over time, with an associated % change from the previous rolling 12-month period. It will also present data on the perceptions of policing in the same format (see example Appendix 2).

8. Making and Responding to Recommendations

8.1 At the conclusion of any study of a scrutiny item, and on the occasions where the CDC have produced a draft report, the CDC will consult the SBPB on the draft and associated recommendations before the report is published.

8.2 Final reports and recommendations will be sent to the relevant responsible/cooperating authorities affected by the report or recommendations, plus other relevant individuals or organisations that contributed to the study.

8.3 Where a relevant authority or co-operating persons or body has been notified, it must:

- Consider the report and recommendations
- Respond in writing to the CDC within 28 days of the date of the report or recommendations, indicating what (if any) action it proposes to take, and
- Have regard to the report or recommendations in exercising its functions.

Appendix 1 – An Example Work Programme

Committee Date	Partner	Substantive SBPS Priority	Scrutiny
March 22	Police Community Safety	All Priorities	To present aims for coming year and report on progress from previous year
June 22	Community Safety LFB LAS	Priority One Safer Neighbourhoods	To present work carried out to support priority one
Sept 22	Early Intervention & Family Support Licensing	Priority Two Reducing Violence Against Women and Girls	To present work carried out to support priority Two
Nov 22	Education, Care & Health Services Probation CCG	Priority Three Keeping Young People Safe	To present work carried out to support priority Three
Feb 23	BCU Hate Crime Community Safety	Priority Four Standing Together Against Hate Crime & Extremism	To present work carried out to support priority Four and end of year update from all partners

Appendix 2 Example Police Data Package

1. The data package below presents monitoring progress against the Police and Crime Plan, whereby the Police have 2 targets:
 1. To reduce crime against set high harm and high-volume priorities as set by MOPAC, and
 2. Improve satisfaction and perceptions around police performance.
2. The data is split into the following categories:
 - High Harm London Wide Priorities (HHLWP yellow cells)
 - Bromley High Volume Local Priorities (HVLP green cells)
 - Local Priority (peach cell)
 - Miscellaneous data including ASB (HVLP) and Total Notifiable Offences (grey cells)
 - Perceptions on policing (blue cells)
3. The HHLWP and HVLP are placed against the MOPAC associated crime categories, and volumes over a 12-month rolling period, the change in volume, and the % change from the previous period are compared and presented. The same is applied to the Police satisfaction and perceptions data.
4. An example package is presented below, and this data is consistent with MOPAC requirements for scrutiny.

REPORTING PERIOD Oct 20 to Sept 21							
	Rolling 12 Months		2020	2021	Difference	% Difference	RAG
				3050	2617	-433	
MOPAC High Harm London Wide Priorities	Domestic Abuse	511	527	16		-14%	●
	Total Sexual Offences	264	169	-95		3%	●
	Knife Crime Offences	56	29	-27		-36%	●
	Gun Crime Offences	500	582	82		-48%	●
	Race Hate Crime offences	1368	1327	-41		16%	●
	Non-Domestic Abuse with Injury	1992	1473	-519		-3%	●
Bromley High Volume Local Priorities	Total Burglary Offences	962	987	25		-26%	●
	Theft of MV					3%	●
Miscellaneous Data	Total Notifiable Offences	22877	21752	-1125		-5%	●
	ASB Calls	11851	9576	-2275		-19%	●
	Totals	43431	39039	-4392		-10%	●
	Feels well informed about Local police Activities over last 12 months	54%	51%			-3%	●
Satisfaction and Perception Data	Agrees Police listen to concerns	73%	71%			-2%	●
	Agree Police can be relied upon to be there when needed	72%	64%			-8%	●
	Agree Police treat all fairly	84%	71%			-13%	●
	Agree Police deal with things that matter to this community	69%	67%			-2%	●
	Knows how to contact Ward Officer	22%	28%			6%	●
	Police do a good job in local area	66%	62%			-4%	●

SAFER BROMLEY PARTNERSHIP STRATEGIC GROUP

Minutes of the meeting held at 10.00 am on 9 September 2021

Present:

Chief Inspector Craig Knight ((Metropolitan Police)) (Chairman)
Joanne Stowell ((LBB Assistant Director: Public Protection)) (Vice-Chairman)

Sharon Baldwin, (Safer Neighbourhood Board Chairman)
Lynnette Chamielec, LBB Housing, Planning and Regeneration
Rachel Dunley, (LBB Head of Service for Early Intervention, and Family Support)
Dirk Holtzhausen, LBB--ECHS
Betty McDonald, (LBB Head of Youth Offending Service)
Mimi Morris-Cotterill, Public Health
Philip Powell, (LAS Stakeholder Engagement Manager)
Paul Sibun, Bromley CCG
David Tait, (LBB Emergency Planning and Corporate Resilience Lead)
Rob Vale, (LBB Trading Standards and Community Safety Manager)
Bill Kelly (LAS)
David Dare (LBB Assistant Director for Children's Social Care)

Also Present:

Councillor Kathy Bance MBE
Councillor David Cartwright QFSM

28	<p>WELCOME/HOUSE-KEEPING/INTRODUCTIONS, APOLOGIES AND DECLARATION OF INTEREST</p> <p>Apologies were received from Chloe Todd and Mimi Morris-Cotterill attended as substitute. Ade Adetosoye (LBB Chief Executive), David Stringer, Rachel Pankhurst, Amanda Mumford, Councillor Angela Page, Jessica Bell, Dawn Helps, Elaine Beadle, Rebecca Saunders, Jamie O 'Malley. David Dare attended as substitute for Janet Bailey.</p>	Action
29	<p>MINUTES OF THE PREVIOUS MEETING</p> <p>The minutes of the meeting held on the 17th of June 2021 were agreed as a correct record.</p>	Action
30	<p>MATTERS ARISING</p> <p>Chief Inspector Craig Knight informed the Board that the police were dealing robustly with persistent beggars in Bromley and that three arrests had been made in the last eight weeks as well as six community resolutions and dispersals being dispensed.</p>	Action

	<p>The Board was provided with an update regarding the work around the Cambridge Crime Harm Index. It was noted that the MET was now running a controlled trial of this across London, led by the central strategic insight group; the results of the trial would be published in due course, after which time Chief Inspector Knight would be happy to share the results of the trial with the Board.</p> <p>Councillor David Cartwright (Chairman of the Public Protection and Enforcement Scrutiny Committee) asked the Chief Inspector a question with respect to the Cambridge Crime Harm Index trial. He asked if the trial would include matters that Bromley residents regarded as high harm crimes-- like anti-social behaviour, joy riding and the misuse of quad bikes.</p> <p>Chief Inspector Craig Knight answered and clarified that the issues mentioned by Cllr Cartwright were not included in the current trial; the trial was focused primarily on violence. Cllr Cartwright asked that it be noted that the PPE PDS Committee had concerns as to what should be classed as 'High Harm' crimes in the borough and there was specific concern from the Committee with respect to the number of deaths caused in the borough and across the country as a result of poor/dangerous driving.</p> <p>Chief Inspector Knight responded and said that he wished to provide some assurance concerning the work of the police road traffic teams that had been undertaken for some time and which was ongoing. The College of Policing had noted the importance of police traffic teams targeting road traffic hotspot areas and they had been doing this since 2007. Councillor Cartwright thanked Chief Inspector Knight for his response, but said that in his view traffic police had been abstracted for other matters on many occasions and so the police's ability to deal with high speed crime had diminished.</p> <p>RESOLVED that the Matters Arising report be noted.</p>	
31	SUBSTANTIVE DISCUSSION: PROGRESS AGAINST THE SAFER BROMLEY PARTNERSHIP STRATEGY	Action
32	<p>QUARTER 2: PRIORITY 2--VIOLENCE AGAINST WOMEN AND GIRLS</p> <p>The VAWG (Violence against Women and Girls) update was provided by Rachel Dunley--LBB Head of Service for Early Intervention and Family Support).</p> <p>There had been an interesting development in that the Housing Division had introduced a 'DAHLIA' flag to their Housing IT systems, to alert when a customer was a victim fleeing domestic abuse to help to manage risk and also to ensure the services provided were sensitive and appropriately delivered.</p>	Action

This had been implemented so that housing cases with a domestic abuse element could be identified and dealt with in a sensitive manner. The Board was briefed that the service was aiming for DAHA (Domestic Abuse Housing Alliance) accreditation by 2022. The Head of Service was pleased to inform the Board that Lydia Lewison had now joined Bromley from LB Greenwich and brought with her much knowledge and passion in relation to domestic abuse, housing and refuges.

The introduction of the 'DAHLIA' flag on the Housing system had been implemented so that housing cases with a domestic abuse element could be identified and dealt with in a sensitive manner. The Board was briefed that the service was aiming for DAHA (Domestic Abuse Housing Alliance) accreditation by 2022. The Head of Service was pleased to inform the Board that Lydia Lucerne would be joining Bromley from LB Greenwich in the near future.

The Head of Service provided a brief update on 'Bromley Y' -- this was Bromley's 'front door' to mental health services for children and young people. She said that a fuller update regarding this would be disseminated via the Board's Secretary. It was noted that the number of referrals to this service was increasing.

The Board was appraised that the Domestic Abuse Strategy was now live and that additional 'Butterfly Cards' were now available for anyone who needed them. These could be sourced via Jamie O' Malley.

The Board was asked to note the change of language with respect to domestic abuse in line with the Domestic Abuse Act 2021. The word 'violence' and all reference to gender had been removed. When the strategy and priorities were formally reviewed, this would need to be updated.

The Assistant Director for Public Protection and Enforcement highlighted certain areas that she would like to look at in more detail going forward, and one of these was regarding the sort of data that was being collated. She said that it was important for the Board to have access to correct data and she would like a sample of the data collected to be brought to the next Board meeting.

A discussion took place regarding the sharing of data with the Board and colleagues and the development of an information sharing agreement alongside it.

A Board Member requested that more awareness be made with respect to the 'Ask Annie' and 'Ask Angela' initiatives.

	<p>It was confirmed that these had been a focus point in the DA Newsletter circulated via the SBPB, BSAB, BSCP, DA Operational Forum, and DA Strategic Board.</p> <p>A discussion took place regarding MARAC (Multi Agency Risk Assessment Conference) and referrals to it, as well as the roles of the MARAC co-ordinator and Chair. Both were supplied by the police. It was the consensus that more co-ordinator support was required as the number of referrals had increased. It was suggested that possibly partners could consider if they could collectively contribute towards the cost of another MARAC coordinator post. It was noted that MOPAC provided funding based on the number of domestic abuse cases that were actually reported. It was felt that in LBB, many cases of domestic abuse were not reported; if individuals felt more confident to report crimes, then the funding from MOPAC would increase.</p> <p>RESOLVED that the Domestic Abuse update be noted and that a sample of the data collected by the new software on the Housing system (regarding cases linked to domestic abuse) be presented to the Board at the next meeting.</p>	RD
	<p>32a UPDATE ON COMMUNITY IMPACT DAYS</p>	Action
	<p>The update concerning Community Impact Days was provided by Rob Vale. He referred to the PowerPoint in the agenda pack and said that the presentation spoke for itself. He informed the Board that Amanda Mumford, the previous coordinator for Community Impact Days, was moving on to another role within the authority. An officer who had previously worked for the Council, was returning to take over the role. The Board expressed their thanks for the excellent work undertaken by Ms Mumford.</p> <p>The Assistant Director said that for the next meeting she would provide an update regarding Community Impact Days and in particular with respect to the next Community Impact Day in Penge, so that everyone involved would be clear on what was required on the day.</p> <p>Councillor David Cartwright stated that the Community Impact Days were of high value and he hoped to see more input from the London Fire Brigade in these activities; it would be good for LFB to build upon the public support that they already had.</p> <p>The Assistant Director for Children’s Social Care, Safeguarding and Care Planning (David Dare), gave an update concerning an event that had been organised by the MACCE (Multi Agency Criminal Child Exploitation) Panel in Mottingham. A Mottingham ‘fun day’ had been arranged which was very successful and which had been supported by many partners including the London Fire Brigade.</p>	

	<p>The ‘fun day’ was well received by the public; there were many people in attendance and feedback was very positive. There had been 183 children in attendance with approximately 112 adults as well. The children were provided with a nutritious packed lunch. The Assistant Director asked for the report on this to be shared with the Board and the Head of Service for Early Intervention and Support said that she would arrange this.</p> <p>There was a general consensus that the Community Impact Days were successful and that they were positively impacting communities.</p> <p>RESOLVED that the update regarding Community Impact Days be noted and that the Assistant Director (and joint Chairman) for Public Protection and Enforcement would provide an update regarding the protocols for Community Impact Days, particularly with respect to the next one in Penge.</p>	JS
33	KEY ISSUES/THEMES	Action
34	<p>UPDATE FROM THE LONDON FIRE BRIGADE</p> <p>The Borough Fire Commander (Kevin McKenzie) attended to update the Board.</p> <p>LFB were still dealing with the implementation of the recommendations from the Grenfell Tower enquiry Phase 1. Some of this involved the acquisition of new equipment and training.</p> <p>LFB served a prohibition notice on June 11th at 14 West Street, Bromley BR1 1RF. The fire brigade was also notified that the property had been broken into and occupied by squatters. Relevant information was shared with LFB crews by Station Commanders. Fire crews carried out visual audits and reported back to the local authority as appropriate. The Commander felt that the incident at 14 West Street was a demonstration of good partnership work and information sharing.</p> <p>A ‘Key Issues’ briefing was in the process of being updated and this would be distributed at a later date after it was completed.</p> <p>The Board was briefed that LFB’s Community Risk Management Action Plan was out for consultation and the consultation period would end on 4th October. The LFB Commander would disseminate this after the close of the consultation period.</p> <p>The LFB commander had been in Bromley since 4th Feb and it was the fourth borough that he had worked in.</p>	Action

<p>The feedback relating to Community Impact days was noted, and the Commander commented that a more targeted approach in terms of resources and locations was required.</p> <p>The Commander had met up with Andy Powell who was the LBB Community Safety Officer working with young people that had been involved in serious youth violence and crime. LFB acknowledged the need for youth engagement.</p> <p>The issue of neurodiversity was discussed.</p> <p>The Board received an update regarding the dangers of emollient creams.</p> <p><i>Post Meeting Note: a briefing regarding this was disseminated post meeting.</i></p> <p>Better training was being provided around fire risk inspections.</p> <p>The LFB had attended a community event at Betts Park on 25th August—this was part of LFB’s commitment to engage more with the community.</p> <p>The Biggin Hill Fire Station extension had been approved. This had helped LFB to strengthen links with the airport. LFB was carrying out exercises at the airport and there continued to be a good level of engagement between LFB and the airport.</p> <p>The Commander was keen to continue good partnership work in places like Star Lane.</p> <p>The Commander commented that Chislehurst Common was a potential fire risk in dry weather. Officers from the borough were working with the national trust to formulate a fire plan.</p> <p>The Head of Trading Standards and Commercial Regulation referenced the successful collaborative work that had been undertaken in the past between LFB and LBB Trading Standards. Both parties desired that this successful collaborative working should continue.</p> <p>The Assistant Director for Public Protection and Enforcement requested that the work being undertaken between LFB and Andy Powell to be added to the VRAP (Violence Reduction Action Plan).</p> <p>The Assistant Director also requested that the LFB’s Community Risk Plan be circulated at the next meeting.</p> <p>Councillor Cartwright asked for an update concerning the possible relaunch of the fire service cadets scheme.</p>	
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	<p>There was historically a very good fire service cadet scheme operating out of Orpington Fire Station.</p> <p>If the fire cadet scheme was going to restart, then LBB Trading Standards should realise that this would provide a source of young people who could be used for things like the test purchases scheme.</p> <p>The Fire Commander confirmed that the possibility of restarting the cadet scheme was being looked at. It was hoped that the cadets would restart early in 2022. It was regarded as a well-respected scheme across the whole borough and was good for youth engagement</p> <p>It was asked if the 'LIFE' programme could restart. The Fire Commander clarified that the 'LIFE' programme was unfortunately coming to an end. A different programme called 'One Life' was being run in partnership with the police.</p> <p>RESOLVED that:</p> <p>1) A 'Key Issues' briefing would be distributed at a later date after being updated.</p> <p>2) LFB's Community Risk Management Action Plan was out for consultation and the consultation period would end on 4th October. The LFB Commander would disseminate the final version of this after the close of the consultation period.</p> <p><i>(Post meeting Note:--the draft version of the document was disseminated post meeting)</i></p> <p>3) LFB and LBB Trading Standards would continue to develop their successful joint working partnership.</p> <p>4) The work being undertaken by Andy Powell from the Community Safety Team in collaboration with LFB be added to the VRAP.</p>	<p>KM</p> <p>KM</p> <p>KM/RV</p> <p>KM/JS</p>
35	<p>UPDATE FROM THE LONDON AMBULANCE SERVICE</p> <p>Bill Kelly (Bromley Group Manager) and Philip Powell (stakeholder Engagement Manager) attended to provide the LAS update.</p> <p>The London Ambulance Service expressed their thanks to Toby Carvery in Crown Lane Bromley and to Bromley College for help during the pandemic with providing parking spaces and accommodation. The Board was informed that the week prior to the meeting, the London Ambulance Service was dealing with 7000 calls a day.</p>	<p>Action</p>

	<p>There was a lot of pressure but they were adapting as best they could. They were grateful for the additional resource supplied from the London Fire Brigade. They were still able to respond to the most seriously ill patients within 7 minutes in most cases.</p> <p>The Board was briefed that the London Ambulance Service would be trialling body worn cameras in October. With respect to hospitals and COVID, it was obviously the case that Covid was still around, but at the moment the LAS was not seeing huge waves of people on ventilators in ITU. One of the reasons for this (as well as the vaccine) was that the NHS had learnt much about what drugs were effective and different treatment regimes. Some of the people in hospital who had tested positive for Covid were asymptomatic but had arrived in hospital as a result of co-morbidities; others had been taken to hospital with Covid as they had not been vaccinated. The LAS made a plea for anyone who had not received the vaccine to do so.</p> <p>As hospitals were still quite busy with ill patients, (with levels that would normally be associated with winter time), there was some nervousness as to what may happen over the winter period.</p> <p>It was noted that hospital was not always the best place for patients and if an alternative solution could be found then this would be actioned by the ambulance service. The use and importance of the 111 service was discussed.</p> <p>The Assistant Director asked if it was possible to be provided with data concerning those people who were treated as a result of weapon enabled crime. Mr Kelly responded by saying that he thought that this was the case, but he would check and report back. Mr Sibun from the CCG stated that this data should be recorded by Children's Services.</p> <p>RESOLVED that the update from the London Ambulance Service be noted and that Mr. Kelly would check on the availability of data concerning those persons who required attention from the ambulance service as a result of weapon enabled crime.</p>	BK
36	<p>FUTURE DIRECTION OF THE BOARD'S WORK--EVIDENCE LED--HIGH HARM</p> <p>Chief Inspector Craig Knight attended to provide this briefing. He commenced by congratulating the NHS on its recognition by the Queen and for receiving the George Cross for 73 years of service.</p> <p>Chief Inspector Knight informed the Board that commencing from the 22nd of September, he would be undertaking work on a research project which was concerning misogynistic behaviour and street harassment.</p>	Action

	<p>He felt that this was an issue that was largely not understood well and was also under reported. On the 22nd of September he would be launching a new App, called 'Safe in the City' and this App could be used to report misogynistic behaviour, either as a witness or as a victim.</p> <p>Chief Inspector Knight said that his aim was to better understand the issues and to map out where misogynistic crime was being committed against women and girls and to see if there was a correlation between this and VAWG. This research was being supported by Cambridge University and had attracted a lot of attention. Chief Inspector Knight was due to appear on national and local television the following week to talk about his research and the App. There was an ongoing debate as to whether misogynistic behaviour should be classed as a hate crime. The App was now live and available to download.</p> <p>It had to be noted that this was a research project and the results of the research would not be available till around January or February 2022. There was some debate as to who owned the research, but the results of the research would be going to the Metropolitan Police Senior Command Team. Interest had also been expressed by the Mayor of London and by the Home Office.</p> <p>Several partners expressed interest on the day in supporting the research, including Rachel Dunley, Dirk Holtzhausen and Judi Obeya from Clarion. The Assistant Director stated that she looked forward to the Board receiving further updates on the work in due course. It was agreed that Chief Inspector Knight would write something concerning his research in the Domestic Abuse newsletter.</p> <p>Chief Inspector Knight expressed his thanks to Bromley Council for the £4k of funding that had been contributed towards the research project.</p> <p>RESOLVED that:</p> <p>1) Clarion, the Adult Safeguarding Board and The Head of Early Intervention and Family Support would support the 'Safe in the City' project as best they could.</p> <p>2) Chief Inspector Craig Knight would write an article on the research project for the Domestic Abuse magazine.</p> <p>3) Chief Inspector Craig Knight would update the board with the findings of his research project in due course.</p>	<p>JO/DH RD</p> <p>CK</p> <p>CK</p>
37	DHR AND PREVENT UPDATE	Action

	<p>The Head of Commercial Regulation and Trading Standards (Rob Vale) attended and updated the Board as follows:</p> <p><u>DHR 1 COMPLETE.</u></p> <p>The Head of Commercial Regulation and Trading Standards would be attending the DVAVAWG Operational Forum on 23rd September 2021 to review the action plan for this DHR and would then formally seek the sign off from the Chairman of the Safer Bromley Partnership Board.</p> <p><u>DHR 2:</u></p> <p>This report had yet to be presented to the Chairman of this Group for sign off prior to sending to the Home Office Quality Assurance Panel. Delays had occurred because of the non-availability of the author who had sadly been dealing with some personal issues. The action plan however was progressing but LBB was reliant on the final report to complete the action plan, as there were some changes made by partners which impacted the recommendations.</p> <p><u>DHR 3</u></p> <p>The report was with the Home Office Quality Assurance Panel. So no update was available; the response was expected in October 2021.</p> <p><u>Prevent Update:</u></p> <p>The Board was updated on the Prevent Review which was being led by William Shawcross CVO.</p> <p>The corresponding report, including any recommendations from the review, had to be submitted to the Secretary of State for the Home Department by 30 September 2021 in time for the Secretary of State to respond to each recommendation and to lay the review report and government response before both Houses of Parliament by 31 December 2021.</p> <p><u>The Protect Duty Consultation:</u></p> <p>The Consultation (which closed on 2nd July 2021) sought to improve the safety and security of public venues, as outlined in the Government's 2019 manifesto. It would look at how legislation might be used to enhance the protection of publicly accessible locations across the UK from terrorist attacks and ensure organisational preparedness. With some exceptions (e.g. on transport security and for certain sports grounds), there was no legislative requirement to consider or implement security measures at publicly accessible locations.</p>	
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	<p>The proposed Protect Duty could apply in three main areas (but may also apply to other locations, parties and processes by exception):</p> <ol style="list-style-type: none"> 1. Public venues (e.g. entertainment and sports venues, tourist attractions, shopping centres). 2. Large organisations (e.g. retail, or entertainment chains). 3. Public spaces (e.g. public parks, beaches, thoroughfares, bridges, town or city squares and pedestrianised areas). <p>The review would look at how any new duty would sit alongside existing duties and the delivery of work in the counter-terrorism space. This included work undertaken by Community Safety Partnerships, Local Resilience Forums and Safety Advisory Groups (SAGs)</p> <p>Many of these had overlapping partner representation and/or interest in these issues. Not all of these were statutory, such as SAGs, which provided a forum for partners to discuss and advise on public safety for particular events/locations – one option Government could consider was strengthening this framework to increase consistency across different areas.</p> <p>There may be scope to extend existing legislation to cover counter terrorism risks, e.g. the Health and Safety at Work Act which considered risks to employees and customers.</p> <p>The Board heard that there was an LGA response to the Consultation which looked at the potential impacts on local authorities.</p> <p>It was agreed that the DHR updates would be presented also to the Domestic Abuse Strategic Board.</p> <p>It was noted that the Police Crime Sentencing and Courts Bill was due to gain Royal Assent in 2022, and the Assistant Director would provide a briefing paper regarding this to the Board before the next meeting.</p> <p>RESOLVED that:</p> <ol style="list-style-type: none"> 1) The DHR updates would be presented also to the Domestic Abuse Strategic Board. 2) The Assistant Director would draft a briefing paper regarding the Police Crime Sentencing and Courts Bill before the next meeting. 	<p style="text-align: right;">RV/RD</p> <p style="text-align: right;">JS</p>
38	CRIME PERFORMANCE DASHBOARD	Action

	<p>Chief Inspector Knight would be appointed to the Task and Finish Group that would consider what data should be presented for scrutiny regarding the police by the Public Protection and Enforcement Committee. The Assistant Director felt that it was sensible for one report to be presented to both the SBP and the PPE PDS.</p> <p>The Chief Inspector briefed the Committee that over the previous few weeks, about 2000 police officers had been abstracted to work in central London to deal with various protest groups which included Extinction Rebellion as well as others.</p> <p>Compared to comparative time periods in 2019, the following statistical changes were noted:</p> <ol style="list-style-type: none"> 1) Domestic Abuse had fallen by 9.5% 2) Gun Crime had increased by 33% 3) Knife crime had fallen by 17% 4) Hate crime had increased 5) Non domestic violence with injury was down by 3% 6) Burglary was down by 40% 7) Theft from motor vehicles was down by 12% 8) The theft of keyless cars had increased <p>It was noted that current data was compared to 2019 data and not 2020 data which had been distorted by the Covid 19 pandemic.</p> <p>Lucien Spencer from the National Probation Service gave an update concerning the expansion of the use of GPS tracking and monitoring for offenders. The Assistant Director asked if Mr Spencer could provide a brief report to the Board regarding this prior to the next meeting. It was further noted that this technology was also used with respect to the monitoring of certain youth offenders.</p> <p>RESOLVED that Lucien Spencer (National Probation Service), would provide an update to the Board regarding the expanded use of the GPS tracking of former offenders released on licence.</p>	LS
39	<p>EMERGING ISSUES/TASK FINISH UPDATES</p> <p>The Board was informed that the Crime Summit for this year would be held on 6th November. There had been some MOPAC (Mayor’s Office for Policing and Crime) funding allocated for this, but it had been reduced this year. MOPAC was considering whether Safer Neighbourhood Boards and Ward Panels would be working in the same way going forward. Bromley had 22 Ward Panels. The next Ward Panel meeting would be on the 22nd of September and would be chaired by Stuart Baker from the Met Police. The various projects that had been initiated by the Ward Panels were included in the VRAP.</p>	Action

The LBB Assistant Director for Housing (Lynnette Chamielec) stated that the previous year, 16% of homeless cases had a domestic abuse element; this year this had increased to 19%. Because of procurement regulations, a tendering process for women and children's domestic abuse refuge services was underway.

BCWA (Bromley and Croydon Women's Aid) had been doing a great job.

The LBB Assistant Director for Housing said that the Housing Department placed a great deal of importance on longevity of support and the well-being of children. Star Lane was an ongoing concern for Housing. Community tension had increased. A specialist Traveller Liaison Officer was working to improve the relationship between the Traveller Community and the Council. The Council was keen to engage in a positive manner.

The Assistant Director of Public Health (Mimi Morris-Cotterill) updated the Board concerning a recent increase in drug related deaths that had occurred primarily as a result of contaminated heroin. Within the BCU (Basic Command Unit) a 'Gold' group had been set up to look at the incidences which had been quite alarming. She expressed the view that there had been a mismatch between local intelligence and police information. It was hoped that the formation of the new BCU group and better information sharing protocols would resolve the issues and facilitate better communication between all relevant parties. It was her intension to draft a list of relevant partners so that the information could be shared as and when required in a timely manner. The Assistant Director further informed the Board that going forward she would be the permanent replacement for Chloe Todd.

Judie Obeya (Neighbourhood Investment Manager—Clarion Housing), agreed to provide a briefing paper concerning Clarion's youth engagement activities which could be presented at the next meeting.

The Head of Service for Early Intervention and Family Support (Rachel Dunley) said that there had been an increase in referrals from partners, but these had been received from the same partners and she hoped that more new referrals would come in from other partners as well.

Mr Lucien Spencer (Head of the National Probation Service Delivery Unit) informed the Board that it was his first meeting at the Board representing a unified probation service--as the service had previously been split between the National Probation Service and the Community Rehabilitation Company.

	<p>Mr Paul Sibun (Adult Safeguarding Manager—South East London CCG) briefed the Board that South East London CCG was continuing on a journey to become a formal integrated care system from next April. In terms of representation from the CCG on the Board going forward, it was likely that a representative from adult safeguarding would continue to attend, but it may also be the case that a new strategic representative from the integrated care system may also attend in the future.</p> <p>The LBB Resilience and Emergency Planning Manager (David Tait) informed the Board that the Wireless Festival was due to take place shortly in Crystal Palace park; this was a hip hop festival that could attract as many as 30,000 people a day. It was the first time it had been held in Crystal Palace Park (previously it was Finsbury Park).</p> <p>The LBB Head of Service for Youth Support and Youth Offending Services (Betty McDonald) attended to provide an update from the Youth Offending Service, particularly on this occasion with respect to governance. There had been a change in the governance structure. Previously a Youth Offending Service Partnership Board existing on its own. The decision had been made to divide this into two. One of these was now an Executive Board chaired by Bromley's Chief Executive, (Ade Adetosoye). The other half had been split into three operational subgroups which sat below the Executive Board. It was hoped that this structure would enable senior managers to have a good oversight and overview of the work.</p> <p>The three subgroups would be dealing with three areas:</p> <ul style="list-style-type: none">• First time entrants into the criminal justice system• The reduction of re-offending• Reducing the amount of young people in police custody <p>The latest data seemed to indicate that youth offending had reduced. A primary aim of the Youth Offending Service was to encourage healthy relationships, positive choices and decisions.</p> <p>Chan Farooqui (VS Hub Manager) attended from Victim Support and stated that VS had seen an increase in domestic abuse cases. Victim Support had also witnessed more cases where mental health issues were involved and it was not sure how much of this was due to the effects of COVID and how much of this may be linked to drug abuse. It was noted that VS had a dedicated team with respect to children and young people; it would be possible for a senior member of the team to come and speak to the Board if this was required.</p> <p>RESOLVED that the various partner updates be noted and that Judie Obeya from Clarion Housing would draft a briefing paper for the Board concerning Clarion's youth engagement activities.</p>	JO
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40	DATE AND TIME OF NEXT MEETING	Action
	The next meeting would be held at Bromley Civic Centre at 10.00am on 9 th December.	

The meeting ended at 12.00 pm

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Report No.
ES20131

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: PUBLIC PROTECTION AND ENFORCEMENT POLICY
DEVELOPMENT & SCRUTINY COMMITTEE

Date: 10th November 2021

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

Title: ENFORCEMENT ACTIVITY UPDATE 2020-2021

Contact Officer: Joanne Stowell Assistant Director of Public Protection
E-mail:joanne.stowell@bromley.gov.uk

Chief Officer: Colin Brand, Director of Environment and Public Protection

Ward: (All Wards);

1. Reason for report

- 1.1 To advise Members on the enforcement activity under delegated powers undertaken by the Public Protection Division, Neighbourhood Management (Environmental Enforcement) and Parking Enforcement during the period 1 April 2020 to 31 March 2021,

2. **RECOMMENDATION(S)**

Members are asked to:

2.1 **Note the contents of this report**

2.2 **Agree to receive an annual report on the service areas identified within the report**

Impact on Vulnerable Adults and Children

1. Summary of Impact: Vulnerable adults and children are at increased risk from the adverse impacts of issues such as: unfit food, poor housing conditions and being targeted by rogue traders. The education and enforcement work of teams within Public Protection seeks to safeguard the health, safety and wellbeing of vulnerable groups. In addition, the work undertaken by Parking Services on Blue Badge enforcement, seeks to ensure that vulnerable road users have the access they require to appropriate parking spaces and that the scheme is not abused.
- 1.2 The service activities within Planning Enforcement and Neighbourhood Management Enforcement are used by all residents, including vulnerable adults and children. They are generally universal in nature. Adjustments are made as required, to ensure services are as accessible as possible and all users are safe. Where vulnerable adults or children may potentially be affected by a proposal or contract, the issues would be covered in that particular report, plan or contract, rather than in this report.

Corporate Policy

1. Policy Status: Existing Policy:
2. BBB Priority: Safe Bromley Vibrant, Thriving Town Centres Healthy Bromley Quality Environment:

Financial

Public Protection & Enforcement

1. Cost of proposal: Not Applicable:
2. Ongoing costs: Not Applicable:
3. Budget head/performance centre: Environment & Community Services Department Budget
4. Total current budget for this head: £
5. Source of funding: Existing controllable revenue budget for 2020/21

Personnel

Public Protection and Enforcement

1. Number of staff (current and additional):
2. If from existing staff resources, number of staff hours: Not Applicable

Legal

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

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): All of the Council's customers (including Council tax payers) and users of the service.

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 At the meeting of the Public Protection and Safety, Policy Development and Scrutiny Committee on 15 November 2007, Members agreed they should receive reports of the enforcement activity undertaken by the Public Protection division.
- 3.2 Previously this report highlighted the enforcement activities of teams within Public Protection. However, in 2018 Members requested that all enforcement related services within the Environment and Community Services (ECS) Directorate be included into the Public Protection and Enforcement Portfolio. The rationale being that it gave a more pronounced regulatory focus.
- 3.1 As the enforcement activity for the additional service areas is data intensive, a brief summary of the key points for each area is highlighted below, and the detail for each service area is included in the appendices detailed in paragraph 3.13.

- 3.4 Key points to note:

Public Protection

- 3.5 In the period April 2020 - March 2021 the teams within Public Protection saw a relative percentage decrease of -50% in the enforcement and regulatory activities as highlighted within Appendix 1 Table 1. Having said that, within the category of statutory nuisance where most enforcement activity takes place, the number of Notices remained static between years (32). However, as a result of the pandemic, food safety enforcement decreased exponentially by 95%. The reasons for this decline are directly attributable to Covid-19, whereby the Food Standards Agency called a moratorium on inspections during the pandemic. This issue, together with the roadmap for recovery, has been considered in full by this Committee on the 7th September 2021 (The Food Safety Plan ES19061). Enforcement within ASB is referral led, and Appendix 1 Table 1 shows that enforcement here fell by 78%. This decrease is as a result of the drop in referrals made to the team by partner agencies, including the police and schools during lockdown. The ASB and Nuisance Team Officers now have combined roles, and post lockdown are working to develop new and improved ways of working with the police and partners.
- 3.6 Notwithstanding the decreases, there were notable increases in enforcement in the areas of private rented sector housing and health & safety. Housing is accepted as a wider determinant of health and wellbeing, and enforcement of housing standards is an integral part of improving housing conditions and in meeting the Council's statutory duties in relation to private rented sector housing. Appendix 1 Table 1 shows that enforcement in this area increased by 67% (6/10). Officers believe that this increase can be attributed to lockdown, whereby tenants had extended periods of being home, and this highlighted the inadequacies of some accommodation.
- 3.7 The Health & Safety Team supports businesses to achieve compliance, so as to ensure the health, safety and welfare of workplaces and employees is protected. Appendix 1 shows that an 87.5% increase in the number of improvement Notices served (16/30). Officers believe that this increase is as a result of certain businesses closing and new ones opening, as the change in ownership results in new proprietors requiring formal action to secure compliance.

Covid Activity

- 3.8 Whilst this report is primarily to report on the enforcement activities of the fiscal year 2020-21, Covid enforcement activity has also been requested. The services within Public Protection have played a vital role throughout the Covid-19 pandemic, from business closure enforcement during the first stage of lockdown, supporting contact tracing efforts, assisting the shielding team, and with helping to safeguard local businesses and residents from pandemic related scams and fraud. Full details are provided within Appendix 1. Enforcement Outputs for Public Protection section 17, whereby it can be seen that the Covid activity from Bromley's Public Protection Officers outperformed many other boroughs, who had a far higher capacity in terms of resources.

Neighbourhood Management

- 3.9 In the period April 2020 to March 2021 the number of reported fly-tips saw a relative percentage increase of 14.5% (3123-3575), however the associated enforcement action taken in response to this activity decreased by 23% when compared to the previous year.
- 3.10 The increase in incidents, whilst considerable, was 25.5% lower than the 40% increase experienced across London as a whole. The regional London increase has also been replicated nationally, and it is thought that the rise can be attributed to the National Covid lockdowns, whereby residents carried out works to their homes which generated waste, coupled with the temporary closures of the Reuse and Recycling Centres, which led to some residents illegally depositing items. With regards to the decrease in investigations, this is directly related to Officers being reassigned to Covid-19 duties, specifically the corporate tasking around shielding and assisting test centres, all of which sought to protect the borough from increasing rates of infection.
- 3.11 As the borough moves forward beyond the pandemic, it will refresh its Fly Tipping Action Plan, and will seek to take advantage of anticipated legislative reforms to tackle waste crime, which include the potential of mandatory electronic waste tracking, as well as additional measures in the Environment Bill 2019-20, that will afford a closer working relationship between agencies and local authorities, together with an ability to combat waste crime through better access to evidence and improved powers of entry. These new powers will help ensure waste criminals, such as illegitimate waste operators reliant on fly-tipping for income, are held accountable for their actions.

Parking

- 3.12 Parking Services worked with APCOA through a difficult year, having to frequently review both the Enforcement and back-office appeals policy due to the Covid-19 pandemic and the restrictions that were in place at the time. Unsurprisingly, PCNs issued were reduced in 2020/21 by 27% in comparison to the previous year and it was agreed that during the peak of the pandemic that some of the 10 enforcement KPIs would not be monitored.
- 3.13 Full details of the enforcement activities of the above services for 2019/20 have been provided in the following appendices:
- Appendix 1 Enforcement Outputs for Public Protection
 - Appendix 2 Enforcement Outputs for Neighbourhood Management Enforcement
 - Appendix 3 Enforcement Outputs for Parking Enforcement

4. POLICY IMPLICATIONS

Public Protection

- 4.1 Enforcement activity is undertaken in accordance with the Enforcement Policy adopted by the Council in March 2020, and the Private Rented Sector Housing Enforcement Policy agreed in June 2021.
- 4.2 The Enforcement Policies provide guidance to Councillors, Officers, businesses and individuals on the range of options that are available to achieve compliance with the legislation enforced by the Public Protection Division
- 4.3 The Public Protection Division undertakes its regulatory functions in accordance with risk assessment criteria, ensuring the service resources are focused upon those activities or practices that present the greatest risk to public health, pose an increased threat to vulnerable groups, pose a risk to safety, or have a potential economic loss to the customer.
- 4.4 The primary objective is to achieve regulatory compliance, recognising that prevention through education and advice is preferable. However, there will be instances where it becomes necessary to take formal action against a business or individual. In these cases, the Enforcement Policy applies the Regulators' Compliance Code, to ensure our regulatory enforcement functions are carried out in a way that is proportionate, consistent, and transparent.

Neighbourhood Management Enforcement

- 4.5 Neighbourhood Management enforcement activities are undertaken in accordance with the policies set out in the Environment and Community Services Portfolio Plan 2018/21 and other associated plans and strategies as detailed in the ECS 'Policy Register: Strategies and Service Plans 2020-21.

Parking

- 4.6 Parking enforcement activities are undertaken in accordance with the Bromley Parking Strategy (Adopted: January 2012) which sets out parking policy and provides local solutions for parking problems including identifying priorities for enforcement and future investment.

5. FINANCIAL IMPLICATIONS

- 5.1 The enforcement activity detailed in this report has been undertaken within the existing revenue budget of the ECS Department and any external funding secured.

6. LEGAL IMPLICATIONS

- 6.1 Legal Requirement: Statutory Requirement. The Council carries out enforcement activity under statutory powers. There are no direct legal implications arising from this update report

7. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 7.1 Vulnerable adults and children are at increased risk from the adverse impacts of issues such as unfit food, poor housing conditions and being targeted by rogue traders. The enforcement work of all teams within Public Protection play a vital part in safeguarding the health, safety and wellbeing of vulnerable groups. In addition, the work undertaken by Parking on Blue Badge enforcement seeks to ensure that vulnerable road users have the access to appropriate parking spaces that they require and that the scheme is not abused.

7.2 The service activities within Planning Enforcement and Neighbourhood Management Enforcement are used by all residents, including vulnerable adults and children. They are generally universal in nature – rather than being directed at particular community groups. Adjustments are made, as required, to ensure services are as accessible as possible and all users are safe. Where vulnerable adults or children may potentially be affected by a proposal or contract, the issues would be covered in that particular report, plan or contract rather than this strategic document.

Non-Applicable Sections:	Personnel Procurement
Background Documents	Public Protection Enforcement Policy ES20007 Private Rented Sector Enforcement Policy ES20095 The Food Safety Plan ES19061

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PUBLIC PROTECTION ENFORCEMENT ACTIVITY - STATUTORY NOTICES

Table 1

	Legislation	Description	Notices 1/4/16– 31/3/17	Notices 1/4/2017– 31/3/2018	Notices 1/4/2018– 31/3/2019	Notices 1/4/2019– 31/3/2020	Notices 1/4/2020– 31/03/2021
Environmental Protection & Nuisance							
1	Environmental Protection Act 1990 S.80	Noise from amplified music (domestic premises) EP90QS	7	8	20	14	10
2	Environmental Protection Act 1990 S.80	Noise from amplified music (commercial premises) EP90RS	3	3	6	4	3
3	Environmental Protection Act 1990 S.80	Noise from intruder/vehicle alarms EP90LS/EP90VS	5	4	10	1	8
4	Environmental Protection Act 1990 S.80	Other noise EP90JS	11	10	14	4	3
5	Environmental Protection Act 1990 S.80	Bonfires EP90ES	4	1	0	4	0
6	Environmental Protection Act 1990 S.80	Other nuisance EP90KS	2	4	0	1	2
7	Environmental Protection Act 1990 S.80	Nuisance from premises EP90CS	1	1	9	3	4
8	Environmental Protection Act 1990 S.80	Nuisance from light EP90NS	0	1	3	0	0

9	Environmental Protection Act S.80	Nuisance from accumulations EP90HS	3	4	0	1	0
10	Environmental Protection Act 1990 S.80	Nuisance from dog barking EP90MS	0	2	1	0	2
11	Prevention of Damage by Pests Act 1949 S.04	Removal of rubbish and treatment for pests PDP49B	37	13	8	26	4
12	Public Health Act 1936 S.287	Notice of intention to enter premises PHA36F	0	2	0	0	0
13	Public Health Act 1936 S.83	Filthy and verminous premises PHA36L	0	0	2	2	0
14	Public Health Act 1936 S.78	Cleansing alleyways PHA36K	0	0	23	0	0
15	Control of Pollution Act 1960 S.60	Pollution from construction sites (noise/dust, etc.) COPA60	23	16	64	58	49
16	Local Government (Misc. Provisions) Act 1976 S.16	Requisition for information LGM76A	16	8	27	9	11
17	Building Act 1984 S.59	Provision to repair drainage no limitation on cost BA84A	2	1	2	0	1
18	Local Government (Misc. Provisions) Act 1976 S.29	Securing empty premises LGM76C	2	1	1	1	1

Housing Enforcement

19	Housing Act 2004 Part 1	Improvement Notice HA0411	0	4	6	4	7
20	Housing Act 2004 Part 1	Prohibition Order HA0420	1	0	3	1	0
21	Housing Act 2004 Part 1	s23 Suspension of Prohibition Notice HA0423	1	2	2	0	1
22	Housing Act 2004 Part 1	Hazard Awareness Notice HA0428	0	1	0	1	2
23	Housing Act 2004 Part 2	Decision to grant a (HMO) Licence HANDGL	16	27	58	58	16
24	Housing Act 2004 Part 2	Proposal to grant a (HMO) Licence HAPGL	16	29	67	53	23
25	Housing Act 2004 Part 2	Temporary Exemption Notice HATEN	1	5	0	3	1
26	Housing Act 2004 Part 2	Proposal to Revoke a (HMO) Licence HAPRL	1	0	0	0	0
27	Housing Act 2004 Part 2	Decision to Revoke a (HMO) Licence HADRL	1	1	0	0	0
28	Housing Act 2004 Part 2	Proposal to Refuse a (HMO) Licence Application HAPRGL	0	0	0	0	0
	Housing Act 2004 Part 2	Decision to Refuse a (HMO) Licence Application HADRGL	0	0	0	0	0
29	Housing Act 2004 Part 2	Decision to Vary a (HMO) Licence HANDVL	1	4	3	4	1

30	Housing Act 2004 Part 2	Proposal to Vary a (HMO) Licence HAPVL	1	4	3	4	2
31	Housing Act 2004 Part 2	number of New HMOs with inadequate fire precautions subject to an Improvement Notice/Fire Safety Improvement Schedule/Licence Condition	N/A	N/A	12	6	29
Health & Safety							
32	Health & Safety at Work etc. Act 1974	Prohibition Notices HSW74B	12	7	10	7	0
33	Health & Safety at Work etc. Act 1974	Improvement Notices HSW74A	15	3	16	30	1
Food Safety							
34	Food Safety – Food Hygiene Regulations	Food Hygiene Improvement Notices FSA90C FSHR6	55	38	43	20	0
35	Food Safety	Emergency Hygiene Prohibition Notices and Orders FSA90D FSA90E	0	0	0	0	0
36	Food Safety	Seizure and destruction of food FSA90A FSA90B FSAVOL FSHR8	1	0	0	0	0
37	Food Safety	Voluntary Closure of Food Businesses	N/A	N/A	4	1	1
38	Food Safety	Voluntary Surrender of Unfit Food	N/A	N/A	2	0	0
39	Food Safety	Voluntary Prohibitions of Unsafe Food Processes	N/A	N/A	2	0	0

Table 2 Anti-Social Behaviour

40	Anti-Social Behaviour Act 2003	Acceptable Behaviour Commitments (ABCs) served	25	30	11	38	4
41	Anti-Social Behaviour Act 2003	Early intervention warning Notices ABCWAR?	1	6	1	23	8
42	Anti-Social Behaviour and Policing and Crime Act 2014	CBO Notices	NA	5	0	3	3
43	Anti-Social Behaviour and Policing and Crime Act 2014	Final warning under Community Protection Remedy	0	0	0	0	0
44	Community Trigger	Number of complaints received under Community Trigger legislation	0	0	6	5	0
45	Community Trigger	Number of Community Trigger complaints upheld	0	0	0	0	0
46	Anti-Social Behaviour Act 2003 & Crime and Disorder Act 1998	ASB & Arson Reduction – Community Impact Days	NA	12	12	12	12

Table 3 REGULATION OF INVESTIGATORY POWERS ACT 2000

Applications for Directed Surveillance 2019/20			
	Team	Operational objective	Number
47	Trading Standards	Test purchasing of age restricted products	0
48	Street Scene and Green Spaces	Fly-tipping investigation	2
49	Street Scene and Green Spaces	Criminal damage	1

Table 4 PROSECUTIONS & WRITTEN WARNINGS

Legislation	Description	Penalty
CONSUMER PROTECTION FROM UNFAIR TRADING REGULATIONS 2008	Misuse of a trade association logo (building)	Warning x 2
CONSUMER PROTECTION FROM UNFAIR TRADING REGULATIONS 2008	Misuse of a trade association logo (gas)	Warning x 1
PRICE MARKING ORDER	Price gouging during the pandemic	Warning x 3
Business protection From Misleading Marketing Regulations 2008	Use of unproven information that could deceive a reader to affect their economic behaviour in relation to the nature of the service described, relating to pandemic.	Warning x 1
Price Marking Order 2004 Consumer Protection from Unfair Trading Regulations 2008 EU-Reg 2016/425 Personal Protective Equipment (Enforcement) Regulation 2018 General Product Safety Regulations 2005	Price gouging during the pandemic, misleading description of face masks	Warning x 2
Consumer Rights (Payment surcharges) Regulations 2021 as amended	Offering a cash discount over another form of payment such as a credit card	Warning x 1
CONSUMER PROTECTION FROM UNFAIR TRADING REGULATIONS 2008	Misleading price of petrol	Warning x 1

Table 5 LICENSING HEARINGS

Premises	Date	Applications heard by the Licensing Sub Committee / Appeals at Magistrates Court	Type of application and outcome
Shampan 4 Biggin Hill Review	24 th June 20	Licensing Sub Committee	Suspended with conditions
Secret Garden Crystal Palace Park Police objections to TENS	7 th Aug 20	Licensing Sub Committee	Granted with Conditions
Chislehurst Sport and Country Club Variation	29 th Sept 20	Licensing Sub Committee	Granted with Conditions
Slammin Events Crystal Palace Park New application	10 th Nov 20	Licensing Sub Committee	Granted with Conditions

Table 6 Permitted Processes

Installation type	Number of permits 2017/18	Number of permits 2018/19	Number of permits 2019/20	Number of permits 2020/21
Dry cleaners	48	47	47	42
Crematorium	1	1	1	1
Cement batching plant	1	1	1	1
Vehicle refinisher	1	1	1	1
Mobile crusher	5	5	5	4
Vapour recovery (petrol stations)	32	32	32	32
Aircraft Recoating	NA	NA	NA	1
Total	88	87	87	82

Table 7 ENFORCEMENT OF COVID REGULATIONS (27th March 2020 to 28th March 2021)

49	Anti-Social Behaviour Act 2003 & Crime and Disorder Act 1998	No. of Community Protection Warnings relating to a failure to keep a business premises covid secure	NA	NA	NA	NA	111
50	Anti-Social Behaviour Act 2003 & Crime and Disorder Act 1998	No. of Community Protection Notices issued in relation to a failure to keep a business covid secure (eg lack of face coverings, statutory notices, social distancing)	NA	NA	NA	NA	15

51	Health Protection (Coronavirus, restrictions) (Steps) Regulations	No. of warnings/prohibition notices (eg lack of face coverings, statutory notices, social distancing)	NA	NA	NA	NA	31
52	Health Protection (Coronavirus, restrictions) (Steps) Regulations	No. Fixed Penalty Notices (eg lack of face coverings, statutory notices, social distancing)	NA	NA	NA	NA	3

Commentary on Enforcement Outputs 2020/21

1. The enforcement remit of Public Protection remains diverse; it includes (amongst other things): protecting people from excessive noise or nuisance, advising businesses on food safety, reacting to outbreaks of food poisoning, acting as an environmental custodian, protecting vulnerable groups from doorstep crime, issuing licences for the selling of alcohol, and improving housing standards through inspecting houses in multiple occupation.
2. The Teams that sit within Public Protection that have an enforcement function are:
 - Nuisance & Anti-social Behaviour
 - Private Rented Sector Housing Enforcement
 - Health & Safety
 - Food Safety
 - Pollution Control
 - Trading Standards
 - Licencing

3. The work of the above teams is set within a regulatory framework, and is statutory, with requirements imposed through various pieces of legislation, and with standards being set by national regulators such as the Food Standards Agency, Department of Food and Rural Affairs (DEFRA), the Health & Safety Executive and the Health Protection Agency.
4. Table 1 rows 1- 10 highlight statutory nuisance Notices served by the Nuisance and Anti-social behaviour Team. This Team provides a statutory service as the Environmental Protection Act 1990 places a duty of Local Authorities to investigate complaints of a statutory nuisance and serve abatement Notices when an Officer is satisfied a nuisance exists (or is likely to recur etc.). The nuisances that can be dealt with are listed within the Act, and include noise, light, smoke and smell from commercial premises. As a result of lockdowns, more people worked from home and felt that they had cause to complain about their neighbours, and an increase in complaints was noted. Despite this, there was not a positive correlation between increased demand and nuisances witnessed, as there was an unrealistic expectation from some residents, whereby, they equated audibility with nuisance, and expected not to hear neighbours activities. In addition, there were periods where the investigation process was hampered by the inability to enter premises to witness noise, notwithstanding these points, the number of Notices served for statutory nuisances remained the same as the previous year at 32.
5. The Council has specific duties under the Prevention of Damage by Pests Act 1949, and is required to take steps to ensure that the Borough is (as far as is reasonably practicable) free from rats and mice. Again, for a Notice to be served, the Officer must witness physical evidence demonstrating an infestation to support this action. The figures in Table 1 row 11 shows an 85% decrease in the service of Notices (26/4). This decrease is due to a 73% decrease in service requests for this issue.
6. No Notices were served under the Public Health Act 1936 S.78 for issues pertaining to accumulations in alleyways, compared to 23 being served in 2018/19 (Table 1 Row 14). As explained in last year's report, ordinarily this type of enforcement falls to the Neighbourhood Management Team, however, as a result of resourcing issues Public Protection assisted that team, and the higher figures for that year were as a result of that additional support. As the resourcing issues have now been resolved, this enforcement element has been passed back to Neighbourhood Management, and will be removed from this report moving forwards.
7. Noise from construction sites is enforced under the Control of Pollution Act 1974 (Table 1 Row 15). This type of Notice does not require a nuisance to be witnessed and may be served proactively to ensure that work times and methods are formalised. The 2017 -18 enforcement report contained a commitment to proactively serve Notices on all construction sites (where appropriate) to ensure that developers were aware of the approved hours of working, and that best practicable means must be employed. Service requests increased against this category by 173% (110/255), yet Table 1 row 15 shows a -15.5 % decrease of Notices being served (58/49), this was because the majority of requests made pertained to DIY rather than construction.
8. Housing is accepted as wider determinant of health, and improving housing conditions can tackle health inequalities and deliver to the previous corporate priority of 'Healthy Bromley' within Building a Better Bromley. Enforcement of housing standards is an integral part of

meeting the Council's statutory duties in relation to private rented sector housing. Table 1, Rows 19 to 22, highlight the enforcement work carried out under Part 1 of the Housing Act 2004. It can be seen that enforcement increased by 67% (6/10), and Officers believe that this increase is related to the pandemic, whereby tenants who previously left their accommodation to work, were required to spend more times within their homes, and that the inadequacies of their accommodation became more apparent to them.

9. The Housing Act 2004 currently requires local housing authorities to license houses in multiple occupation (HMOs) if they accommodate more than five tenants; this is called mandatory licensing, and is already in place. In October 2018 the government removed the 'three or more' storeys' criteria throughout England. In doing so they extended the mandatory scheme to include most houses and flats occupied by five or more people, in two or more households, who share a kitchen, bathroom and/or toilet facilities (regardless of the number of storeys). The impact from this extension to the licensing scheme was of particular note in 2019 and again in 2020, where the figures compared to 2018 were significantly higher. Within this reporting period, Table 1 Row 23 shows a -72% decrease on the number of licences issued (58/16). Table 1 Row 24 shows the same downward trend for licence proposals. This was an expected outcome, as the vast majority of properties within the mandatory scheme should now have come forwards. Additionally, it is thought that Covid-19 was also a factor, as residents did not move on due to lockdowns, and the pandemic impacted on the ability to buy and sell properties. Notwithstanding this, work will be undertaken to identify all HMOs that now require licensing under the new regime, and it is anticipated reports moving forwards will show a return to a slight upward trend in these areas.
10. Post Grenfell, a new KPI was suggested for new HMOs, that sought to ensure that those identified as having inadequate fire precautions, be appropriately conditioned, served with an improvement Notice and/or a Fire Safety Improvement Schedule. This KPI was agreed by the PP&E PDS on 27th September 2018 (report ES18069) and introduced in October 2018. The outturn is provided in Table 1 row 31, and it can be seen that 29 such HMOs were identified, and of these all were conditioned or served with an Improvement Notice or Fire Safety Improvement Schedule, so meeting the 100% KPI.
11. The Health & Safety Team supports businesses to achieve compliance, so as to ensure the health, safety and welfare of workplaces and employees is protected. Table 1 row 32 shows a 30% (10 to 7) decrease on the number of prohibition Notices served, however, row 33 shows an 87.5% increase (16 to 30) in the number of improvement Notices served). This increase is as a result of business closing and new ones opening, and the change in ownership results in new proprietors requiring formal action to secure compliance.
12. 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, and performance is monitored by the Food Standards Agency (FSA) against the Food Law Code of Practice. Table 1, rows 34 to 39 highlight a -95% decrease in food safety enforcement. The reasons for this were as a result of COVID, whereby the FSA called a moratorium on inspections. The full reasons were fully explained in the report to the PP&E PDS committee on the 7th September 2021 (ES19061), together with the roadmap for recovery.

13. The Antisocial Behaviour Team enforces the Anti-social Behaviour Act 2003 and the Anti-Social Behaviour and Crime and Policing Act 2014. Enforcement in this area is referral led, and the data shows an overall decrease of -78% in enforcement. Table 2 row 40 shows an 89% decrease (38/4) in the number of Acceptable Behaviour Contracts (ABC), and a - 65% decrease (23 to 8) in the number of early intervention warnings served on the previous year. The exponential decrease is as a result of the drop in referrals made to the team by partner agencies, including the Police and schools during lockdown.
14. Community Impact days (CID Table 1 row 46) aim to reduce or stop crime and the negative impact it has on the community in areas where the highest levels of ASB and arson are recorded, such as Cray Valley East and West, Mottingham and Penge. This CID initiative is funded by the Mayor's Office for Policing and Crime (MOPAC). The Safer Bromley Partnership, including Community Safety, the Metropolitan Police, the London Fire Brigade and Clarion Housing, work with other organisations (including voluntary groups), in a co-ordinated manner with agreed taskings, with the aim to reduce recorded ASB and Arson within the targeted areas. According to London Fire Brigade and the Police, incidents of arson within the areas has decreased by:
- -4.2% Cray Valley East
 - -18.5% Cray Valley West
 - -20% Mottingham
 - -75% Penge & Cator
- The overall reduction on arson was -20% (122/98), which was a significant improvement on the -4% reduction for the previous year. The LFB and CID coordinator are looking to improve on the reductions and will give specific consideration to Cray Valley East moving forwards.
15. Table 3 provides details of the number of RIPA applications across the division. No under-age sales campaigns were carried out during this time due to business restrictions and social distancing rules.
16. Table 4 highlights the prosecutions and written warnings given by Trading Standards, and Table 5 presents the outcomes from Licensing Hearings.

Covid Enforcement

17. Public Protection have played a vital role throughout the pandemic in explaining rules to local businesses, encouraging them to comply with regulations, and enforcing where necessary. Table 7, Rows 49 to 52 lists the formal enforcement that Public Protection have taken within between 27th March 2020 to 28th March 2021 as a result of COVID enforcement. When it came to boroughs submitting their enforcement actions, benchmarking demonstrated that the criteria as stipulated by the relevant body requesting the data (e.g. Office for Product and

Safety Standards (OPSS)) was not always followed or interpreted correctly by all boroughs. For example, the OPSS made it clear that survey visits should not be counted under covid secure visits, and Bromley Public Protection Officers followed this advice, whereas enquiries showed that others did not. As a result, some figures were inflated, and when Bromley numbers were compared with other boroughs, the numbers (at face value) appeared low. However, when monthly submissions were compared and contrasted with the resources available, it could be seen that Bromley had the equivalent of 3 FTEs dedicated to visits, whereas some boroughs had up to 49 FTEs. Notwithstanding whether the submissions made by boroughs were done so correctly, when the number of Bromley visits were multiplied out, it was clear that outputs of Public Protection Officers outperformed other boroughs. For example, on one submission, a particular borough reported 2123 visits undertaken within a 30-day period, with 49 FTEs assigned to the task. This equated to 1.4 visits a day per Officer ($2143/49 = 43.3$ visits a day & $43.3/30\text{days} = 1.4$ visits a day). For the same time period, using the same multipliers (and using figures submitted in strict accordance with the guidelines), Public protection Officers undertook 3.8 visits a day, which equates to a 164% higher output.

Conversely, there were boroughs which did not inflate figures, and which still had high numbers of FTEs assigned, but were outperformed by Bromley. As an example, a particular borough with 30 FTEs reported 77 visits in a month; using the multipliers above, this equated to 2.5 visits per Officer a month and 0.08 visits per day. Again, when you compare the equivalent monthly Officer performance between Bromley and this borough, the Public Protection output activity was 4649% higher.

The above demonstrates that regardless of whether a borough correctly interpreted the data requirements, or the number of FTEs assigned to the task, Bromley outperformed many other boroughs, which is something Officers were rightly proud of.

NEIGHBOURHOOD MANAGEMENT (ENVIRONMENTAL) ENFORCEMENT ACTIVITY 2020 / 21

1. The Council aims to reduce fly-tipping and improve the street scene through prevention measures, communication and enforcement activity, in line with Building a Better Bromley's '*A Quality Environment*' & '*Safe Bromley*', outcomes, as well as achieving the aims set out within the Environment Portfolio Plan 2020/ 21 and Public Protection and Enforcement Portfolio Plan.

2. Outcome 4 of the Public Protection and Enforcement Plan is: '**We will protect and improve the environment through custodianship enforcement**' and the supporting aim (with respect to street scene enforcement) is as follows:

- **Aim 4.7:** Investigate and enforce complaints of enviro-crime in accordance with the regulatory framework.

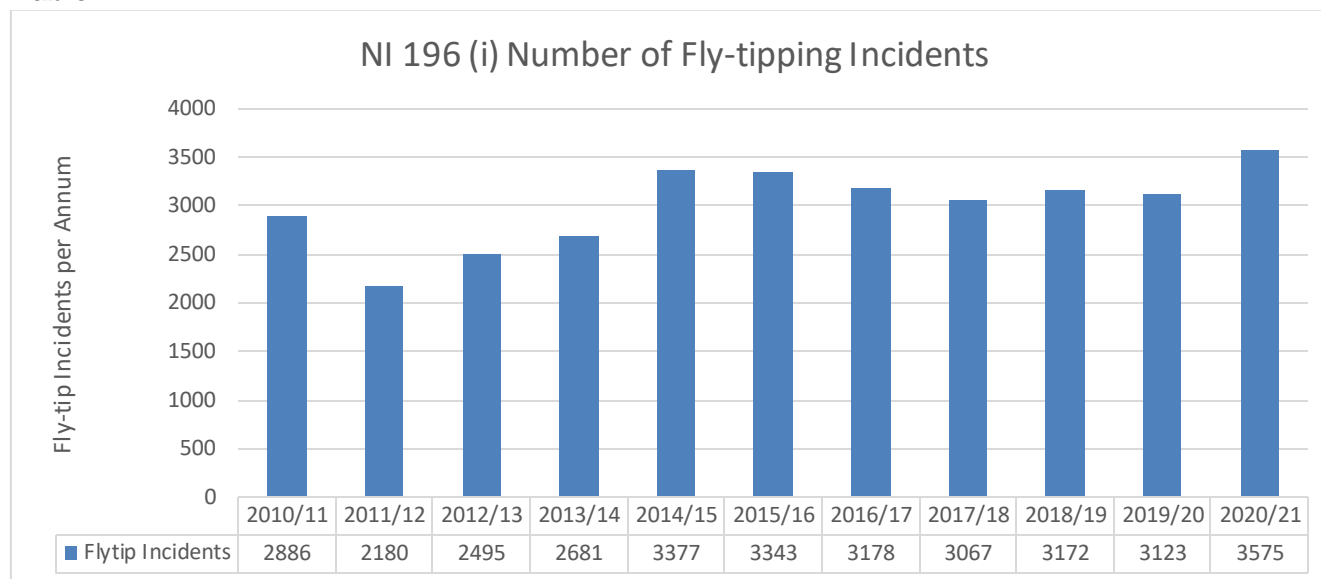
3. There is 1 FTE fly tipping Enforcement officer's post who is responsible for investigating the reported fly tipping incidents where evidence has been collected by the contractor.

Fly Tipping

4. Despite action taken by the Council over a period of years to tackle enviro-crime and fly-tipping, it continues to blight the street scene. Fly-tipping has a huge impact on residents, and there are high costs associated with Council clean-up operations, in addition to the associated health, safety and environmental risks.

5. There were 3575 fly-tipping incidents in 2020 / 21, an increase of 242 incidents on the previous year (see Table 1 below). All incidents of fly tipping are checked by the contractor for any possible evidence that may lead to enforcement action, whilst officers also manually check reports for details of evidence/witnesses and follow up these leads once located.

Table 1



Number of fly-tipping incidents 2019/20

6. The Council's aim is to investigate and take appropriate enforcement action in respect of 10% of fly-tipping incidents. Enforcement action cannot be taken for each incident, due to lack of evidence. Last year the team held four operations with the Metropolitan Police targeting vehicles involved in fly-tipping. These operations resulted in the stop and search of 52 vehicles and verbal advice provided to several drivers. During these stops officers can utilise a range of enforcement powers which could result in seizure of vehicles.

7. Community Impact Days are planned and held monthly in the Borough. Client Street Enforcement officers work alongside other agencies such as the Public Protection team, the Metropolitan Police Service and the DVLA to target areas of the Borough where there are crime hotspots (including fly-tipping). Clean-up events are encouraged which involve volunteers from the local community. This multi-agency approach is beneficial in terms of tackling many issues in an effective and resource efficient way. The events are funded by the London Mayor's Office for Policing and Crime (MOPAC).

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Fly Tipping Communication

8. Fly-tipping hotspots are monitored by the Fly tipping action group and Street Enforcement officers, managed by the Neighbourhood Management Street Enforcement Manager. To raise awareness, posters are used to highlight the issue of fly tipping, residents' responsibilities and the penalties for offending. These posters are temporary and can be moved around the Borough as required. Neighbourhood Officers distribute postcards to houses undergoing renovation works (e.g. Property development, front-driveways and tree-works etc.) to ensure householders have asked privately employed contractors for evidence they have a "waste carriers" licence. Postcards are also handed out on stop and search operations facilitated by the Police and at Community Impact Days. Articles on fly-tipping have appeared in 'Safer Bromley' and the 'Environment Matters' newsletters which are sent to all residents bi-annually.

9. Neighbourhood Officers engage with 'friend's groups' within their allocated wards on the issue of fly-tipping and responds directly to any concerns they may have. Residents groups can be supplied with purple sacks for local clean up events which are provided by our Service Provider, Veolia. Sacks are left in the area and a collection requested from the street cleaning teams. The use of the purple sacks makes the waste identifiable to Veolia as being separate from fly-tipped black bags.

Fly Tipping Reporting

10. Fly-tipping is reported to the Council via Fix My Street (FMS) which is used by the public, contractors and monitored by officers. Rectification times are recorded on the system and the status of any outstanding incidents monitored by Performance Management & Business Support Team. Performance reports are generated three times per week for monitoring purposes.

11. Table 2 below shows the number of reports of fly tipping alongside the number of actual fly-tipping incidents (where the same incidents have been reported by multiple residents) and the subsequent number of incidents investigated.

Table 2

	2016/17		2017/18		2018 / 2019			2019 / 2020			2020 / 2021		
Month	Reports	Incidents	Reports	Incidents	Reports	Incidents	Incidents investigated	Reports	Incidents	Incidents investigated	Reports	Incidents	Incidents investigated
April	455	286	479	261	462	290	15	349	231	31	365	196	0
May	445	258	362	236	465	308	21	425	258	8	453	218	7
June	510	323	424	240	468	292	23	410	276	24	486	237	8
July	483	320	487	264	456	247	22	475	274	11	494	284	12
August	600	344	468	286	466	274	12	423	264	4	523	307	5
September	530	265	412	251	381	240	25	412	259	33	571	370	25
October	410	230	412	230	337	251	29	410	254	29	483	320	11
November	380	183	351	234	370	277	26	420	292	31	548	378	24
December	390	250	366	240	411	291	31	430	287	21	489	338	17
January	399	259	494	346	395	277	20	452	312	20	425	331	20
February	353	214	354	261	292	197	15	325	212	16	396	272	22
March	407	246	416	218	356	228	28	355	204	14	555	324	36
Total	5362	3178	5025	3067	4859	3172	267	4886	3123	242	5788	3575	187

12. Compared to 2019/20, the numbers in 2020 /21 increased by 242 incidents which is a rise of 14.5 %, and the investigation action taken in response to this activity fell by 55 incidents.

During the period of 2020 – 2021 the following enforcement action was taken, 22 Written warnings, 2 x £400 FPN's issued, 1 x £80 FPN's issued for littering.

From the number of incidents reported the Environmental Enforcement Officer aims to investigate 10% of the incidents reported and take the appropriate enforcement action. The reason for this drop in investigations is twofold due to the National Covid lockdowns which restricted officer's ability to attend fly tipping. The team were also redeployed for several months assisting Bromley Councils Covid response. Officers were tasked with manning Norman Park Test Centre and contacting individuals who were shielding.

A Targeted Response to Fly-tipping incidents.

13. Fly -tipping evidence gathered by the Street Enforcement officers in conjunction the Council's Geographical Information Systems generates heat maps of local fly-tipping hotspots that enables a targeted approach for education and enforcement activities and campaigns. Such examples include the "We're Watching you" fly-tipping campaign which involved advertising in the local press, Bus Shelters, Council website, distribution of postcards and other media material.

Other areas of enforcement

14. The Enforcement Team also conduct further works to assist Bromley achieve its aims of a safe, green authority. And also fall under Outcome 4 of the Public Protection and Enforcement Plan is: **'We will protect and improve the environment through custodianship enforcement'**

These workflows are assigned to three FTE Street Enforcement Officers (within the Enforcement Team) and are associated with enforcement of Highways and Green Spaces. Over time we would hope that enforcement will result in higher compliance and the reduction in reports received.

15. Table 3 below provides baseline data for the year 2020/21 covering the actions of these officers.

Table 3

	<u>2020/2021</u>
<u>BALL GAMES</u>	1
<u>ENCROACHMENT</u>	41
<u>OBSTRUCTIONS</u>	539

<u>OTHER</u>	145
<u>OVERHANGING VEGITIATION (OHV)</u>	528
<u>SIGNS</u>	158
<u>STREET TRADING</u>	48
<u>PARKS AND GREEN SPACES</u>	154
<u>VEHICLES</u>	1646

Obstructions

16. 539 reports were received by the team relating to obstructions on the public highway. The work varied from matters as small as a cone left in the road up to building materials from renovation works being stored on the highway. Enforcement officers aim to educate residents on their responsibilities and allow reasonable amount of time for the problem to be rectified prior to any formal enforcement process. This can be done by removing all items from the highway, we also offer advice on how to obtain a licence from Bromley Council allowing the building material to be store on the highway. If our advice is ignored, then enforcement action is taken. During this period the team issued six fixed penalty notices (£100 penalty) to property owners for continual wilful obstruction to the highway after verbal advice has not been complied

Other

17. Other reports are normally generated for fly tipping or the abnormal situations which do not occur often. Damage to the highway reports is a common example of the type of report we receive under this code. Enforcement will investigate this concern from cradle to grave ensuring that Bromley does not foot the bill from the damage caused. Enforcement will ascertain who caused the damage and will issue invoice to reinstate the public footpath, verge or highway that has been damaged.

Overhanging vegetation (OHV)

18. 528 reports received during the year covering vegetation which required a simple trim but also lengthy investigations into ownership of land/trees which resulted in the assistance from our legal department to ascertain legal directions. These reports can take up a lot of officer's time establishing ownership and working with the property owners to resolve the matter in hand.

Parks and green spaces.

19. Bromley Council have appointed Ward Security to assist with the investigation & deterrence of reports received relating to ASB, crime, dog attacks and missing person/child within the Borough Greenspace. Ward Security also act as the first port of call for attending out of hours illegal encampments, all officers are trained in carrying out welfare checks and are fast to respond preventing potential encampments from occurring.

Vehicles

20. 1646 reports were received last year relating to vehicles which residents felt caused nuisance and/or were believed to be abandoned. The Enforcement Team attend every report to verify if the vehicle is taxed. The team arranged for the removal of 89 vehicles that were deemed to have been abandoned and issued three Fixed Penalty Notices to individuals who were identified as being responsible for abandoning a vehicle

21. In 2020/21 the Enforcement Team have supported colleagues in loss adjustment, they assisted with the recovery of costs for 46 cases recouping a total value of £12,590.53 of public funds. These works relate to works Bromley have conducted for making good highway defects or cutting overhanging branches where the individual/s responsible failed to conduct works themselves after issuance of notices.

PARKING ENFORCEMENT ACTIVITY - STATUTORY NOTICES

The Council aims to deliver its parking enforcement activities in order to support Building a Better Bromley's 'A Quality Environment' & 'Safe Bromley',

Parking Services continues to enforce the Blue Badge misuse project, (introduced across the two boroughs in 2017/18 as part of the shared service), in partnership with APCOA.

In 2020/21 7,438 badges were checked by Civil Enforcement Officers (CEOs) across the Borough, however due to COVID no physical badges were confiscated, although one badge was surrendered to a CEO.

There were 72 cases of Blue Badge misused being taken to court for prosecution, all of these either pleaded guilty or were found guilty in their absence at court.

The main role of a CEO is to keep the traffic flowing and when the local restrictions are not being adhered to, a PCN will be issued. The table below highlights the enforcement activity in terms of PCNs served over the last 5 years.

Legislation	Description	16-17	17-18	18-19	19-20	20-21
<u>Traffic management Act 2004</u>	PCN issued, including bus lanes.	89,185	80,495	73,348	78,435	56,962

The number of PCNs year on year can fluctuate depending on policy and introduction of new technologies and on street activity. In 17/18 a new contract was awarded to APCOA which resulted in a reduction in the number of PCNs being issued. Management action and application of KPI penalties in the contract have mitigated the loss to the council.

Due to COVID, it was necessary to make various operational challenges to the pre - pandemic enforcement operations. These included:

- A shortening of patrol lengths to ensure that proper hygiene standards were maintained
- A focus on main thoroughfares and congestion areas
- A reduction in the number of active patrols as a result of social distancing guidelines having to be followed in the base of operations by the service supplier, and
- Patrols were also lost as a result of several CEOs having to self-isolate, as a result of contracting COVID, or being instructed to self-isolate in accordance with Government guidelines

Unsurprisingly, COVID has impacted on the number of PCNs issued for all types of traffic and parking contraventions.

The CEOs also helped with the Traffic flow at the waste sites when the Council re-opened these as less CEOs was needed on street for enforcement purposes.

There are 10 KPIs within the contract around the I enforcement activity, this includes monitoring the CEOs hours on street, PCNs issued, Enforcement Request visits and checks they are using their Body Warn Video currently.

KPI	Description	Number of Defaults served in 20/21
Enf 1	Processing of all Regulation 9 CEO issued PCNs and Warning Notices. To be processed and uploaded onto the ICT system with associated photographs, BWV within 24 hours of issue.	2
Enf 2	CCTV notice Processing (PCN and Warning Notices included). 100% of CCTV footage must be reviewed and PCN's entered and processed onto the notice processing system within three working days of the contravention being recorded, including uploading of evidence onto the public facing module of the IT system. This will be measured using the daily log sheet recorded by the CCTV Operatives.	4
Enf 3	Civil Enforcement Error. For the purposes of assessing performance, CEOs error which have been cancelled as part of a client processing procedures. Voids & Spoilt are not included in this KPI <ul style="list-style-type: none"> • Insufficient or poor quality evidence, notes, photographs etc • Incorrect information on PCN e.g. Incorrect contravention code, incorrect street etc, • PCNs issued in error i.e. driver complied with rules and regulations • Failure to follow Enforcement Guidelines e.g. observation times, • Other errors originating with the CEO that results in a cancelled PCN, which should have been rectified by Service providers not including Performance Related Reductions 	515
Enf 4	Minimum Deployment level on a given day Measured against the method statement provided or agreement throughout the contract.	0

Enf 5	<p>Deployed Hours (CEOs on Street only) - (not linked to actual CEOs) Measured against the method statement provided or agreement throughout the contract.</p> <p>Permitted variation to planned hours, hours Met/Not Met. (up to - 5% and +10% each month. Up to end of March per annum 100% must be achieved).</p>	0
Enf 6	<p>Number of CEOs deployed per day</p> <p>Measured against the method statement provided or agreement throughout the contract.</p>	0
Enf 7	<p>Compliance rate</p> <p>The compliance rate will be monitored by client Officers observing vehicles in the defined areas to assess if adequate enforcement coverage is being achieved. Failure to address non-compliance of parking regulations will result in a failure to meet this KPI.</p>	0
Enf 8	<p>Urgent enforcement requests.</p> <p>Service providers must attend requests within times set in the table set out in 4.7.10.</p>	0
Enf 9	<p>BWV quantity.</p> <p>95% of PCNs must have body worn video unless the Service provider has highlighted a problem in advance. i.e. 100 PCNs issued and 10 of those do not have any BWV Video. This would result in 5 individual failures.</p>	0
Enf 10	<p>Quality BWV Video.</p> <p>This KPI will be measured by random sampling up to 100 body worn video checks in any monthly period, and the percentage of checks where the standard of body worn video has fallen below the satisfactory level cannot be lower than 95% at any time throughout the contract term. The Authorised Officer will have the final decision on what constitutes a pass or fail.</p>	0

The KPIs are discussed monthly with the Managing Director of APCOA as well as the contract meetings and APCOA have paid a default charge as detailed in the specification. Due to the Covid-19 pandemic it was agreed with Senior Management at the Council and APCOA that some KPIs over 20/21 would not be monitored or triggered over parts of the year.

Parking Services continues to work with APCOA to review the service and ensure that enforcement is being as efficient as it can be.

Appeals Service

Bromley aims to provide accessible, affordable, fair and effective parking services and this involves enforcement activity. If Penalty Charge Notices (PCNs) are fairly issued, then the number of appeals should be low and the data in figure 1 below shows the number of appeals to have been heard by Environment & Traffic Adjudicators (the independent appeals body) has fallen steadily from 274 in 2011/16 to 176 in 2020/21 (a significant reduction).

Clearly Bromley wishes to win any appeals which do go to the Environment & Traffic Adjudicators The data in figure 2 shows that LB Bromley won 86% of appeals which were heard by the adjudicator, which is a good increase from 19/20.

Legislation	Description	16-17	17-18	18-19	19-20	20-21
<u>Traffic management Act 2004</u>	Appeals heard by the Environment and Traffic Adjudicators (ETA) against PCNs issued by LBB (ES8)	274	300	192	113	176
<u>Traffic management Act 2004</u>	ETA cases won by LBB (ES9) (% of cases heard)	81	80	90	73	86

Report No.
ES20121

London Borough of Bromley

PART ONE - PUBLIC

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

Date: **10th November 2021**

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

Title: **Risk Register PP&E**

Contact Officer: Lucy West, Senior Performance Officer
Tel: 020 8461 7726 Email: Lucy.West@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 Public Protection and Enforcement Risk Register for detailed scrutiny by the PDS Committee.
- 1.2 This appended Risk Register also forms part of the Annual Governance Statement evidence-base and has been reviewed by: E&PP DMT, Corporate Risk Management Group; and Audit Sub-Committee.

2. **RECOMMENDATIONS**

That the Public Protection and Enforcement PDS Committee reviews and comments on the appended Risk Register. It should be noted that each risk has been highlighted as being relevant to one committee only (and therefore should be discussed at the relevant meeting).

Impact on Vulnerable Adults and Children

1. Summary of Impact: The appended Risk Register covers services provided by the E&PP 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: PP&E Portfolios
 4. Total current budget for this head: £2.54.m
 5. Source of funding: Existing controllable revenue budget 2021/22
-

Personnel

1. Number of staff (current and additional): 47.3 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&PP 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.
- 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&PP 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&PP'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 10th September 2021 and at Audit Sub-Committee, which last met on 21st October 2021. The next CRMG meeting will take place on 17th January 2022.
- 3.8 At the time of writing, the Council has 123 individual risks (112 departmental plus 11, high-level, Corporate Risks (covering key risks which apply to the Council as a whole).
- 3.9 E&PP Department currently has 29 risks (~24% of the Council's total). The PP&E portfolio has 22 risks currently.
- 3.10 The appended E&PP 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. Number E&PP risks are currently ragged 'red' following implementation of management control measures.

- 3.11 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.
- 3.12 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 regularly reviewed and adjusted in light of any changes to the LBB Corporate Leadership Team structure.
- 3.13 Risk 12 has a Current Risk Rating of 16, which is red. This grant is released on a 2 year cycle, current cycle ends March 2022. The grant was reduced in 2017 and there is no guarantee it will be sustained post April 2022, however informal confirmation has indicated that a further 2 years funding will be made available. Should this situation not be confirmed and funding not continued, the OOH service will not continue unless funded centrally. The service is staffed on a voluntary basis, and the remuneration for covering the shift has been increased, however the appetite of officers post COVID to furnish this rota has not improved, as such there is no guarantee that officers will be available. The team are currently pressing MOPAC to confirm funding status, producing a report regarding centrally funding the OOH service and continuing the encourage officers to participate in the rota.
- 3.14 Risk 19 has a Current Risk Rating of 20, which is red. The increased costs for Coroners Service is due to the additional estimated costs due to additional high risk post mortems resultant of COVID, and further requested changes to the service that fall outside of the memorandum of understanding. The Director of Environment and Public Protection has challenged the appropriateness of the required spend for this service to mitigate the risk.

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. It also covers Public Protection activities which do impact on vulnerable people – for example the Trading Standards team are responsible for safeguarding vulnerable adults who may be targeted by rogue traders and the Anti-Social behaviour and Gangs and Serious Youth Violence teams are actively targeting and supporting those young people that are at risk of crime.

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. 12: Staff Resourcing and Capability).

9. LEGAL IMPLICATIONS

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

Non-Applicable Sections:	None
Background Documents: (Access via Contact Officer)	None

RISK REGISTER REPORT (ES18037): RISK ASSESSMENT GUIDANCE SUMMARY

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

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

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

Public Protection and Enforcement (PP&E) Risk Register

No.	E&PP RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING			DATE LAST REVIEWED:	28/10/2021
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING	FURTHER ACTION REQUIRED	RISK OWNER
1	1	All E&PP	Emergency Response Failure to respond effectively to a major emergency / incident internally or externally	Cause(s): -Emergency may be triggered by storms, floods, snow, extreme heat or other emergency. Ineffective response could be caused by capacity and/or organisational issues Effect(s): - 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. Adoption of Standardisation Process in terms of Emergency Response 3. Business Continuity Policy & Strategy and associated Service Business Continuity Plans 4. Out-of-Hours Emergency Service 5. Winter Service Policy and Plan (reviewed annually) 6. Ongoing training, Testing and Exercising programme 7. Multi-agency assessment of emergency risks 8. Training Programme delivered for volunteers in respect of Standardisation Process 9. Implementation of 'on-call rota' for Emergency Response Manager and at Director level 10. Multi-agency forum for emergency preparedness, response and recovery planning within the Borough	2	3	6	1. Delivery of the Business Continuity Management process by CLT 2. Development of risk-specific arrangements based upon London Resilience frameworks, informed by the Borough Community Risk Assessment 3. Recruit and train more Emergency Response Volunteers 4. Implementation of the Resilience Standards For London	David Tait
2	2	All E&PP	Central Depot Access Major incident resulting in loss of / reduced Depot access affecting service provision (LBB's main vehicle depot)	Cause(s): -Fire, explosion, train derailment, strike etc. Effect (s): -Significant service disruption (Waste, Street Cleaning, Gritting, Fleet Management, Neighbourhood Management etc.)	Service Delivery	4	3	12	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 Cleansing) and Highways Winter Service Team 4. 'Central Depot Users Group' (Health & Safety/co-operative forum for all site users) 5. Work Place Risk Assessments in place 6. Depot Insurance reviewed September 2020 to ensure full reinstatement cover is in place 8. Waste Service Change has incorporated separate battery collection which will reduce likelihood of fires from batteries in residual waste	3	3	9	1. Site re-development plans to include recommendations from fire safety audit. To include consideration of fire suppression systems	Paul Chilton
3	3	All E&PP	Fuel Availability Fuel shortage impacting on LBB and service provider fleets, and LBB staff transport	Cause(s): -National or local fuel shortage caused by picketing or other external factors Effect (s): -Failure to provide services impacting on residents and other customers - LBB staff unable to commute or use their own vehicles for business journeys	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. Ensure service providers Business Continuity Plans include security of fuel supplies. LBB pool cars are available for LBB staff use 2. Ensure 3. Adoption of EV pool fleet	Peter McCready
4	4	All E&PP	Business Continuity Arrangements Lack of up-to-date, tried and tested, BCP for all Council services	Cause(s): -Failure to implement and keep up-to-date effective service and corporate Business Continuity Plans Effect(s): -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.Full suite of BC plans in place across all Directorates, including E&PP 3. Overarching corporate BC plan developed identifying prioritisation of all services 4. All E&PP BC plans now transposed on to new corporate BCP template 5. Corporate BC management policy & strategy document signed off by leader and chief exec 6. Ensure all service providers have up to date Business Continuity Plans	2	3	6	1. CLT adoption of BCM which will monitor delivery on behalf of COE going forwards. Current COVID-19 disruption to ways of working has tested BCPs during the largest disruption encountered in decades. ICT system failure has been identified as the largest risk and is outside the control of E&PP	David Tait
5	6	All E&PP	Industrial Action Contractors' staff work-to-rule / take strike action impacting on service delivery	Cause(s): -Union dissatisfaction over pay and conditions (particularly in Waste, Libraries) Effect (s): -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. Staff training and engagement built into the Environmental Services contracts	2	4	8	1. Review public communications to be used in the event of a strike 2. Staff training and engagement incorporated into communications with Library staff	Colin Brand
6	14	All E&PP	Income Variation (Highways and Parking*) Loss of income when the Council is looking to grow income to offset reduced funding *Note new COVID-19 specific parking risk addition at the end of this register	Cause(s): - 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) Effect (s): -Loss of income with potential to reduce service delivery funds	Financial	3	3	9	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 Performance Indicators reported to PDS Committees (E&CS, PP&E) 8. Scrutiny of APCOA at PDS meetings	3	2	6	1. Refine procedure for resolving disputes with utilities 2. Review of parking tariff structures 2. Monitor income trends 3. Continue to monitor success in achieving enforcement objectives 4. Intelligence-led targeting of hotspot sites for enforcement 5. Review of further income opportunities as part of Council's Transformation agenda	Colin Brand
7	18	All E&PP	Town Centre Businesses and Markets Loss of town centre businesses to competition and as a result of the COVID-19 pandemic	Cause(s): -COVID-19 Pandemic causing businesses and market traders to cease trading (temporarily or permanently) - Town centre social distancing measures resulting in a reduced amount of market stalls Effect(s): -Reduction in high street business and market stall occupancy -Loss of income (Business rates and market stalls) -Poor public perception and negative publicity	Financial	5	3	15	1. BID Teams organise town centres events 2. Investment in Orpington High Street and Bromley North (done) 3. Regular advertising / promotion of markets and availability of stalls 4. Review of Market operational costs to reduce costs where possible (a new Market Strategy is under development and will be delivered from 2020/21) 5. Regular maintenance and renewal of market infrastructure - recent market relocation project has been completed and feedback from traders is positive 6. Markets Manager attends regular strategy meetings with BIDs and has provided guidance for a new town centre (BID) framework agreement	2	3	6	1. Ongoing review of market provision linked to outsourcing service provision 2. Detailed annual action plan to be drawn up for each town centre	Colin Brand

Public Protection and Enforcement (PP&E) Risk Register

No.	E&PP RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING			DATE LAST REVIEWED:	28/10/2021
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING	FURTHER ACTION REQUIRED	RISK OWNER
8	20	All E&PP	Staff Resourcing and Capability Loss of corporate memory and ability to deliver as key staff leave (good new staff are at a premium)	Cause(s): -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. Effect (s): -Loss of organisational memory, greater reliance on contracted staff, delays in delivering services / plans (e.g. Transport Local Implementation 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).	Service Delivery	3	4	12	1. Ongoing programme to find and retain quality staff through internal schemes such as career grades and ongoing CPD	3	3	9	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. Enlist contractor to assist with tree survey backlog.	Colin Brand
9	22	All E&PP	Climate Change Failure to adapt the borough and Council services to our changing climate	Cause(s): -Severe weather events including extreme heat, storms, floods etc. Effect (s): -Resulting in threats to service provision, environmental quality and residents' health in addition to reputational damage caused by perceived lack of action to tackle climate change	Service Delivery	3	4	12	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 4. Establish net zero (direct) carbon emissions target for 2029 as part of 10 year climate plan 5. Climate Change included within Corporate Risk Register	2	4	8	1. Emergency Planning to liaise with Public Health on cross-cutting issues e.g. excess summer deaths and vector-borne disease etc. 2. Detailed climate action plan developed as part of ongoing Carbon Management Programme, in order to achieve net zero organisational carbon emissions by 2029.	Sarah Foster
10	25	Public Protection	Income Reconciliation (Public Protection Licensing) Uncertainty around income reconciliation when the Council is looking to grow income to offset reduced funding	Cause(s): - Lack of processes to reconcile actual licence fee income against expected income held on service specific IT systems. Effect (s): - Loss of income with potential to reduce service delivery funds - Reputational damage	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	2	2	4	1. Refine procedure for reconciliation of expected income against actual and provide suitable training for staff to deliver this - project now underway	Joanne Stowell
11	28	Public Protection	Dogs and Pests Contract Failure to deliver the contract to the required service levels	Cause(s): -Lack of robustness within contract specification in terms of contract deliverables and Key Performance measures Effect (s): -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	This contract is now running well, the contract is due to be extended for 1 year and no action is required at this time.	Joanne Stowell
12	29	Public Protection	Out of Hours Noise Service Failure to deliver statutory services	Cause(s): 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 2022. The grant was reduced in 2017 and there is no guarantee it will be sustained post April 2022, however informal confirmation has indicated that a further 2 years funding will be made available. Should this situation not be confirmed and funding not continued, the OOH service will not continue unless funded centrally. The service is staffed on a voluntary basis, and the remuneration for covering the shift has been increased, however the appetite of officers post COVID to furnish this rota has not improved, as such there is no guarantee that officers will be available. Effect: Inability to deliver Out of Hours Noise Service.	Service Delivery	4	4	16	1. Annual review with MOPAC on service outcomes 2. Exploring the cost of a centrally funded OOH service. 3. Amended website to manage customer expectation	4	4	16	1. Press MOPAC to confirm funding status. 2. Produce report on centrally funding OOH service. 3. Continue to encourage officers to participate in rota.	Joanne Stowell
13	30	Public Protection	Integrated Offender Management Failure to contribute to IOM in Bromley	Causes: -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 2020. Effect: -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.	Joanne Stowell
14	31	Public Protection	Anti-Social Behaviour Co-ordinator post: Failure to deliver ASB problem solving and partnership activity	Cause(s): -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. Effect: -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.	Joanne Stowell

Public Protection and Enforcement (PP&E) Risk Register

No.	E&PP RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING			DATE LAST REVIEWED:	28/10/2021
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING	FURTHER ACTION REQUIRED	RISK OWNER
15	32	Public Protection	Gangs and Serious Youth Violence Officer Failure to deliver Gang problem solving and partnership activity	Cause(s): -this has funding from MOPAC for 1 year only and the post which is responsible for the strategic coordination of gang interventions and reductions in serious youth violence. Effect: -Inability to fund this post would result in the cessation of strategic coordinated gang disruption work with partners across the borough.	Service Delivery	3	4	12	1. Annual review with MOPAC on service outcomes	3	4	12	1. Funding for this post is in place via MOPAC until 2022 - MOPAC funding is outside of the control of LBB.	Joanne Stowell
16	33	Public Protection	The provision of 24/7 CCTV Monitoring	Cause: -COVID 19 Pandemic Effect: -Potential Loss of officers through sickness arising from a potential second wave leading to an inability to provide 24-7 CCTV monitoring	Service Delivery	3	4	12	The CCTV Control Room is back to full strength - 1 x supervisor and 2 x operators on shift patterns. All staff have now been offered a vaccination and the social distancing/face masks requirement is still in force and will continue until such a time the Government relaxes restrictions further.	1	3	3	1. Monitor and review monthly with Contractors	Rob Vale
17	34	Public Protection	Loss of Income from Licensing	Cause: -COVID 19 pandemic and the potential impact on achieving income from licensing. Effect: -The majority of income relates to alcohol and gambling licences which are renewed between October and November each year. The Team has already received the income for the first 7 months of this financial year and have not had any requests to refund existing licences. However, there is a risk that the expected income target will not be met.	Financial	3	4	12	1. The Council's Covid business support schemes offer business rate deferral as well as discretionary grants to cover non staffing overheads, the government have not specifically provided assistance with the costs of licences and premiums and there is an assumption that the loss of use of the licence would be covered under the distortionary grants. For most businesses the licence would be a minor cost and they would be more concerned with significant overheads such as staffing, rents and rates. Should expected income targets not be met, the Division would look to mitigate the shortfall by reducing expenditure in the first instance to maintain a balanced budget. 2.Licensing income for 2021/22 is likely to be reduced as a result of business closure. This may be off set by new businesses. An accurate forecast is not likely to be available until March 2022	3	3	9	1. Monitor and review income quarterly	Rob Vale
18	35	All E&PP	Risk to Health - Ill health resulting from enforcing Health Protection COVID 19 Restrictions Regulations 2020 or from operating public sites	Cause: -COVID 19 pandemic and the National requirement that Environmental Health and Trading Standards Officers enforce the COVID 19 Health Regulations. - Operational activities requiring staff to undertake site visits or to operate public facilities. Effect: -The potential for Officers, Contractors and Visitors to be exposed to and infected by, COVID 19	Service Delivery	3	4	12	1.Risk assessments have been undertaken. No face to face inspections to take place, all investigations to be undertaken at arms length via email or telephone, drive by etc. unless there is a life and limb enforcement issue. Should face to face contact be necessary, PPE (gloves/masks/sanitiser) is available and must be used. 2. Assessments for bulky waste collections undertaken via telephone.	3	3	9	1.To regularly review the risk assessments	Colin Brand
19	37	Public Protection	Increased Costs for Coroners Service	Cause: -Coroner increasing staffing costs - potential request for a second court - high profile inquests, changes to assistant coroners longer term practices - additional high risk post mortems due to covid Effect: -Additional estimated costs (£238k staffing 57K post mortems) over the BAU contract costs	Financial	4	5	20	1. Ongoing communication with the South London Coroners Consortium to ensure that additional costs are scrutinised, and not agreed to without prior consultation and agreement	4	5	20	1. If the PM costs cannot be absorbed by the consortium, the Division would look to mitigate the additional spend by reducing expenditure within the division/department in the first instance to maintain a balanced budget. 2. With regards to the potential additional spend on staffing etc - The Director of Environment and Public Protection has challenged the appropriateness of the required spend. Until such time that the necessary evidence has been presented to support the increases, Bromley payments will be made according and within the constraints of the budget. Separate payments will be made to cover the additional costs (e.g. inquests) as and when they are incurred.	Joanne Stowell
20	39	Public Protection	Dysfunctionality of Uniform Information Management System	Cause- This is a legacy system and there has been a lack of investment in maintaining it. Effects- The dysfunctionality of Uniform affects how data is recorded, retrieved and analysed. Data is not always saved or retrievable. Further there are issues trying to connect to the system remotely.	Service Delivery	5	4	20	Ongoing communication with IT, the system upgrade went ahead in May 21 - further patches required	3	4	12	The issues with data retrieval appeared to have been resolved - The system was loaded to the new server, which should have alleviated many of the issues experienced - testing was carried out in August to determine effectiveness, and issues remained. Further testing ongoing together with dialogue with BT, and additional resources are being dedicated to provide a permanent fix to all issues experienced	Joanne Stowell
21	41	Public Protection	Dysfunctionality of IT Support & Systems	Cause- The Customer Service Centre changed the Customer Relationship Management(CRM) software to CXM on 1st July. Whilst the testing of the system was successful the live rollout has circa 10 errors which is affecting all calls and web queries passed into Uniform. Effects- service requests are not being received by Public Protection in a timely manner, issues with quality e.g.missing telephone numbers, emails etc. This adds further delay in dealing with requests - complaints increase .	Service Delivery	4	4	16	Ongoing fault reporting with IT.	3	4	12	The team are communicating with IT and Liberata to resolve problems, progress is being made, and the issues are being kept under review	Joanne Stowell

Public Protection and Enforcement (PP&E) Risk Register

No.	E&PP RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING			DATE LAST REVIEWED:	RISK OWNER
						Likelihood	Impact	Risk Rating		Likelihood	Impact	Risk Rating	FURTHER ACTION REQUIRED	28/10/2021
22	42	Public Protection	Health & Safety (PP&E) Ineffective management, processes and systems within department	Cause(s): -Failure to take departmental action to reduce likelihood of accidents, incidents and other H&S issues Effect (s): -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. Fire responsible persons list in place for all sites under the control of E&PP 9. EPP Health and Safety Committee meets regularly to review departmental Health and Safety arrangements 10. All corporate policies followed for COVID-19 risk assessments. Staff home working unless unable to do so.	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. Ensure the necessary communication and training is provided. 4. Ensure resource exists to discharge statutory functions 5. Ensure any staff wishing to return to the office during the COVID-19 pandemic have done so in accordance with all corporate processes and procedures.	Sarah Foster

ENDS

London Borough of Bromley

Report No.

ES20123

PART ONE - PUBLIC

Decision Maker: Public Protection and Enforcement PDS Committee

Date: 10th November 2021

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

Title: Contracts Register

Contact Officer: Lucy West, Senior Performance Officer
Tel: 020 8461 7726 Email: Lucy.West @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 September 2021's 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 1st September 2021 and presented to E&RC PDS on 15th September 2021.
- 1.2 There is no accompanying 'Part 2' of this agenda, as any relevant commentary has been included in the Part 1 report.

2. **RECOMMENDATIONS**

That the PDS Committee:

- 2.1 **Reviews the appended £50k Contracts Register (which also forms part of the Council's commitment to data transparency).**

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: - £2.54m
 5. Source of funding: - Existing controllable revenue budget for 2021/22
-

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 (CDB) 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 Register is a key tool used by Contract Managers as part of their daily contract responsibilities. The Contract Registers are reviewed by the Procurement 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 192 active contracts covering all portfolios as of 1st September 2021 for the September reporting cycle as set out in Appendix 1.

Public Protection and Enforcement

Item	Category	February 2021	May 2021	September 2021
Total Contracts	£50k+	6	5	5
Concern Flag	Concern Flag	0	0	0
Risk Index	Higher Risk	1	1	1
	Lower Risk	5	4	4
Procurement Status for Contracts approaching end date	Red	N/A	0	0
	Amber	N/A	0	0
	Green	N/A	2	2
	Neutral	N/A	3	3

- 3.6 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 are no contracts flagged for attention.
- 3.7 The Dogs and Pests Control Services contract, which is ID 3763 is being extended to 31/01/2023.

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 [Building a Better Bromley](#) document 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 to aid transparency (this data is updated after each Contracts Sub-Committee meeting).

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


Appendix 1: Key Data (All Portfolios)

Item	Category	February 2021	May 2021	September 2021
Contracts (>£50k TCV)	All Portfolios	223	211	192
Flagged as a concern	All Portfolios	4	2	2
Portfolio	Executive, Resources and Contracts	57	48	49
	Adult Care and Health	74	72	40
	Environment and Community Services	16	19	18
	Children, Education and Families	40	36	39
	Renewal and Recreation and Housing	30	31	41
	Public Protection and Enforcement	6	5	5
Risk Index	Higher Risk	95	85	61
	Lower Risk	128	129	131
Procurement Status for Contracts approaching end date	Red	N/A	2	2
	Amber	N/A	46	12
	Green	N/A	51	62
	Neutral	N/A	112	116

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.

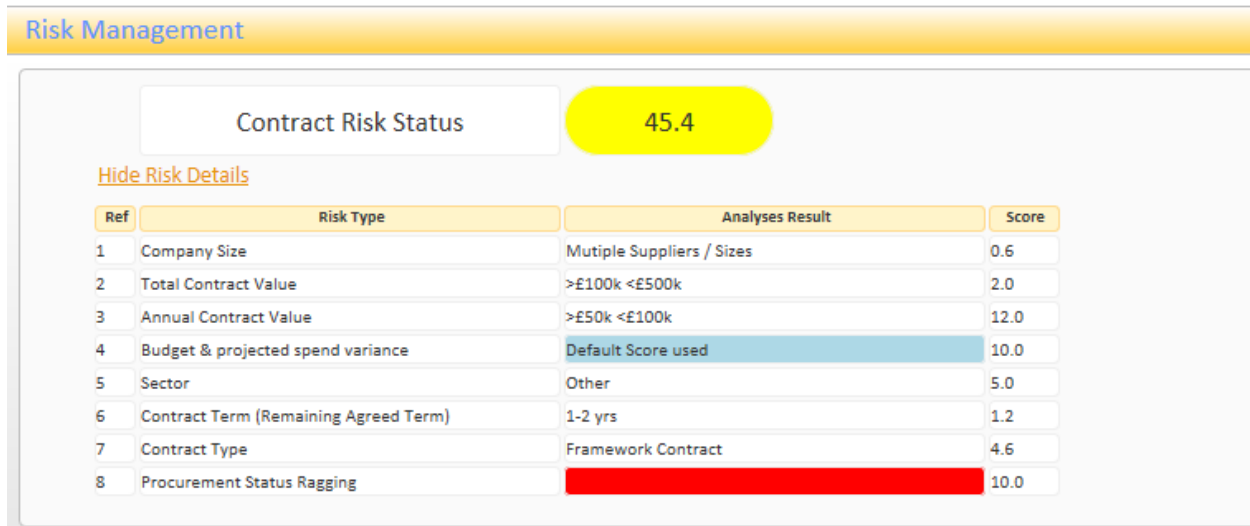
Register Category	Explanation
Risk Index	Colour-ranking system reflecting eight automatically scored and weighted criteria providing a score (out of 100) / colour reflecting the contract's intrinsic risk
Contract ID	Unique reference used in contract authorisations
Owner	Manager/commissioner with day-to-day budgetary / service provision responsibility
Approver	Contract Owner's manager, responsible for approving data quality
Contract Title	Commonly used or formal title of service / contract
Supplier	Main contractor or supplier responsible for service provision
Portfolio	Relevant Portfolio for receiving procurement strategy, contract award, contract monitoring and budget monitoring reports
Total Contract Value	The contract's value from commencement to expiry of formally approved period (excludes any extensions yet to be formally approved)
Original Annual Value	Value of the contract its first year (which may be difference from the annual value in subsequent years, due to start-up costs etc.)
Budget	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)
Projection	Expected contract spend by the end of the current financial year
Procurement Status	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').
Start & End Dates	Approved contract start date and end date (excluding any extension which has yet to be authorised)
Months duration	Contract term in months
Attention 	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)
Commentary	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>
Capital	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					
Period	3 months						<div style="display: flex; align-items: center; gap: 10px;"> <div style="width: 20px; height: 20px; background-color: red; border: 1px solid black;"></div> Requires an agreed plan <div style="width: 20px; height: 20px; background-color: yellow; border: 1px solid black;"></div> Develop / test options <div style="width: 20px; height: 20px; background-color: orange; border: 1px solid black;"></div> Consider options <div style="width: 20px; height: 20px; background-color: green; border: 1px solid black;"></div> No action required </div>
	6 months						
	9 months						
	12 months						
	18 months						
		£5k - £50k	£50k - £100k	£100k - £173k	£173k - £500k	>£500k	
		Total Contract Value					

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Contract Register Report - £50k Portfolio Filtered -

September 2021

Risk Index	Main Contract Data						Finance Data		Proc. Status	Contract Terms			Attention	Capital
	Contract ID	Owner	Approver	Contract Title	Supplier Name	Portfolio	Total Value	Original Annual Value		Start Date	End Date	Months Duration		
Lower Risk	3763	Mark Atkinson	Joanne Stowell	Dogs & Pest Control Services	SDK Environmental Ltd	Public Protection and Enforcement	370,000	60,500	■	01/02/2018	31/01/2023	60		
Lower Risk	4941	Joanne Stowell	Colin Brand	Mortuary Contract	Princess Royal University Hospital Mortuary via Kings College Hospital NHS Foundation Trust (with LB Bexley)	Public Protection and Enforcement	540,000	180,000	■	01/10/2019	30/09/2022	36		
Lower Risk	3799	Joanne Stowell	Colin Brand	Coroners Service	London Borough of Croydon	Public Protection and Enforcement	448,640	224,320		01/04/1966	31/08/2029	762		
Lower Risk	4858	Robert Vale	Joanne Stowell	CCTV Repair and Maintenance Contract	Tyco Fire & Intergrated Soution (UK) Ltd	Public Protection and Enforcement	691,081	135,573		01/04/2019	31/03/2024	60		
Higher Risk	4859	Robert Vale	Joanne Stowell	CCTV Monitoring	Enigma CCTV Ltd	Public Protection and Enforcement	1,441,000	288,200		01/04/2019	31/03/2024	60		

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Report No.
CSD 21116

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: PUBLIC PROTECTION AND ENFORCEMENT POLICY
DEVELOPMENT & SCRUTINY COMMITTEE

Date: 10th November 2021

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

Chief Officer: Tasnim Shawkat, Director of Corporate Services and Governance

Ward: (All Wards)

1. Reason for report

- 1.1 Members of the Committee are asked to review the Work Programme and make suggestions for any modifications to the Work Programme as may be considered appropriate.
- 1.2 The Committee should note that the Work Programme is fluid and subject to change

2. **RECOMMENDATION(S)**

(1) That the Committee notes the Work Programme

(2) That Committee members and officers comment on any matters that they think should be considered on the Work Programme going forward so that the Work Programme can be modified and developed.

Impact on Vulnerable Adults and Children

1. Summary of Impact: Some of the matters considered by the PP&E PDS Committee may have an impact on vulnerable adults and children
-

Corporate Policy

1. Policy Status: Existing Policy:
 2. BBB Priority: Excellent Council 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: £366k
 5. Source of funding: 2021/2022 revenue budget
-

Personnel

1. Number of staff Five full time staff.
 2. If from existing staff resources, number of staff hours: About an hour 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 primarily for the benefit of the PP&E PDS Committee Members and Co-opted Members and relevant officers.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
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 Committee 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 2021/22 with the Chairman and officers.

Background Documents:	Minutes of the previous meeting. Previous Work Programme Report The Public Protection and Enforcement Portfolio Plan
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PUBLIC PROTECTION AND ENFORCEMENT PDS---Wed, 10th November 2021
Matters Outstanding
Police Update
Public Protection Performance Against Portfolio Plan Indicators
Portfolio Holder Update
Budget Monitoring
The Draft Protocol For Scrutiny of the Safer Bromley Partnership
Enforcement Activity Update 2020-2021
Contracts Register Report
Public Protection Risk Register Update
Previous Minutes of the Safer Bromley Partnership
Work Programme
PUBLIC PROTECTION AND ENFORCEMENT PDS---Tues, 1st Feb 2022
Matters Outstanding
Police Update
PPE Performance Overview
Portfolio Holder Update
Public Protection Performance Against Enforcement Indicators Scrutiny Report
Public Protection and Enforcement Draft Budget for 2022-2023
Fly Tipping Action Plan Update Report
Contracts Register Report
Update report on the Model London Lettings Enforcement Policy
Public Protection Risk Register Update
Previous Minutes of the Safer Bromley Partnership
Work Programme
BYC Presentation--TBC
PUBLIC PROTECTION AND ENFORCEMENT PDS---Wed, 23rd March 2022
Matters Outstanding
Police Update
PPE Performance Overview report
Portfolio Holder Update
Budget Monitoring
Neighbourhood Management Enforcement Update
Contracts Register Report
Public Protection Risk Register Update
Mopac Update
Previous Minutes of the Safer Bromley Partnership
Emergency Planning and Corporate Resilience Business Continuity Service: Annual Update
Update from SLAM
Work Programme
POSSIBLE FUTURE PRESENTATIONS and AGENDA ITEMS

Report on LBB's contract with the Coroner.
Report on the link between Crime and Mental Health Issues
Update report on the Mortuary Contract
Prevent Update
An update report concerning the Model London Lettings Policy be presented to the Committee later in the year
POSSIBLE FUTURE VISITS
Coroners' Court.
Bethlem Hospital—Arranged for Thursday 18th November 2-4pm

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