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DATE: 23 January 2023

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

Councillor David Cartwright QFSM (Chairman)
Councillor Kim Botting FRSA (Vice-Chairman)
Councillors Mike Botting, Sophie Dunbar, Josh King, Andrew Lee, Alexa Michael,
Chloe-Jane Ross, Harry Stranger and Rebecca Wiffen

Non-Voting Co-opted Members –

Sharon Baldwin, Chairman - Safer Neighbourhood Board
Dr Robert Hadley, Bromley Federation of Residents Associations
Oscar Seal, Bromley Youth Council
Nathan Ward, BYC

A meeting of the Public Protection and Enforcement Policy Development & Scrutiny Committee will be held at Bromley Civic Centre on **TUESDAY 31 JANUARY 2023 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

- 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 15TH NOVEMBER 2022 (Pages 1 - 12)**
- 4 QUESTIONS FOR THE CHAIRMAN OF THE PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE**

- 5 QUESTIONS FOR THE PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO HOLDER**
- 6 MATTERS ARISING/OUTSTANDING (Pages 13 - 16)**

HOLDING THE PORTFOLIO HOLDER TO ACCOUNT

- 7 PORTFOLIO HOLDER UPDATE**
- 8 PUBLIC PROTECTION AND ENFORCEMENT PERFORMANCE OVERVIEW (Pages 17 - 18)**
- 9 PRE-DECISION SCRUTINY OF PORTFOLIO HOLDER REPORTS**

Portfolio Holder decisions for pre-decision scrutiny.

- a OUT OF HOURS NOISE SERVICE (Pages 19 - 38)**

POLICY DEVELOPMENT AND OTHER ITEMS

- 10 PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO DRAFT BUDGET 2023/24 (Pages 39 - 52)**
- 11 HOUSES OF MULTIPLE OCCUPATION--MEMBER UPDATE (Pages 53 - 60)**
- 12 MINUTES OF THE PREVIOUS MEETING OF THE SAFER BROMLEY PARTNERSHIP BOARD--12TH JANUARY (Pages 61 - 82)**
- 13 SCRUTINY OF THE SAFER BROMLEY PARTNERSHIP (Pages 83 - 144)**
- 14 BROMLEY DOMESTIC ABUSE SERVICES--INFORMATION PAPER (Pages 145 - 152)**
- 15 PUBLIC PROTECTION AND ENFORCEMENT RISK REGISTER (Pages 153 - 162)**
-
- 16 WORK PROGRAMME (Pages 163 - 168)**

Agenda Item 3

PUBLIC PROTECTION AND ENFORCEMENT POLICY DEVELOPMENT & SCRUTINY COMMITTEE

Minutes of the meeting held at 7.00 pm on 15 November 2022

Present:

Councillor David Cartwright QFSM (Chairman)
Councillor Kim Botting FRSA (Vice-Chairman)
Councillors Mike Botting, Julie Ireland, Josh King,
Andrew Lee, Alexa Michael, Harry Stranger and
Rebecca Wiffen

Sharon Baldwin and Nathan Ward

STANDARD ITEMS

93 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS

Apologies were received from Councillor Chloe-Jane Ross and Cllr Julie Ireland attended as substitute.

Apologies were received from Cllr Sophie Dunbar.

94 DECLARATIONS OF INTEREST

There were no declarations of interest.

95 MINUTES OF THE PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE HELD ON 16th JUNE 2022

The Committee considered the minutes of the Public Protection & Enforcement PDS Committee that met on 16th June 2022.

RESOLVED that the minutes of the meeting held on 16th June 2022 be agreed and signed as a correct record.

96 QUESTIONS FOR THE CHAIRMAN OF THE PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE

No questions were received for the Chairman.

97 QUESTIONS FOR THE PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO HOLDER

Two oral questions had been received from a member of the public and one had been carried over from Cllr Kathy Bance. The questioners were not

present on the night and so the questions were dealt with as written responses which will be appended to the minutes.

98 MATTERS OUTSTANDING

CSD 21146

The Matters Outstanding report referred to the problems posed by motorists driving under the influence of drugs and alcohol. The Chairman tabled a report from the Daily Mail dated November 9th 2022 which expressed the view that 2021 was 'the most dangerous year ever on our roads'. He requested that the article be sent to the Safer Bromley Partnership. It was hoped that dealing with motorists under the influence of drugs and alcohol could be incorporated into the new Safer Bromley Partnership Strategy. A Member expressed the view that concerning this matter a national advertising campaign was required. It was felt that a dedicated police traffic unit was required. The police were hindered from dealing with these matters and others because of frequent abstractions caused by protest groups like 'Extinction Rebellion'.

The Chairman felt that the matter of dealing with motorists under the influence of alcohol and drugs was not helped by the new policy of the police which was to prioritise 'high harm crimes'. In his view the deaths and injuries caused by motorists under the influence of alcohol and drugs was of such a level that it should be considered as a 'high harm crime'. A Member suggested the use of ANPR cameras may help.

RESOLVED that the Matters Outstanding report be noted and that a copy of the Daily Mail article be provided to the Safer Bromley Partnership.

HOLDING THE PORTFOLIO HOLDER TO ACCOUNT

99 PUBLIC PROTECTION AND ENFORCEMENT PERFORMANCE OVERVIEW and PORTFOLIO HOLDER UPDATE

The Portfolio Holder for Public Protection and Enforcement advised Members that she had recently attended the Safer Neighbourhood Board Crime Summit and the meeting of the Safer Bromley Partnership Board. She had also recently chaired a meeting of the Bromley Mentoring Initiative which was designed to help young people who needed help, advice and guidance. There had been issues with 'boy racers' in various wards, particularly in Chelsfield and Biggin Hill. The Council was working closely with the police on this matter. The Portfolio Holder was due to have a meeting soon with Chief Superintendent David Stringer and would raise the issue with him at that time.

With respect to the performance overview report, the Chairman referred to issues that had been flagged as red; he commented that the matters concerning the 'Challenge 25' policy were self-explanatory and would disappear soon. The rest of the issues that had been flagged red were

connected with the Food Safety Plan and this would be a looked at later in the meeting as it was an item on the agenda.

RESOLVED that the Portfolio Holder Update and the PP&E Performance Overview report be noted.

a BUDGET MONITORING 2022/23

ES20232

The Chairman welcomed Mr Murad Khan to the meeting as it was his first committee meeting after his recent appointment as the new Head of Finance for the ECS and Chief Executives Department. The Chairman asked for an explanation of the £23k overspend that was noted in the budget monitoring report. It was explained that this was expenditure on staffing which included people working overtime on enforcement duties and covering other short term vacancies.

RESOLVED that the Portfolio Holder be recommended to endorse the 2022/23 revenue budget monitoring position for the Public Protection and Enforcement Portfolio.

b FOOD SAFETY PLAN UPDATE

ES 20206

The Committee was briefed that a backlog of food safety inspections had accrued as a result of the COVID-19 pandemic and staffing shortages. As well as the backlog there was the additional pressure created by 387 new unrated businesses that had been registered during the previous year and would also need to be inspected. The report that was presented to Members set out the Council's plan for dealing with the backlog of cases. Two agency workers had been recruited in the last few months to assist in clearing the backlog. A Member suggested that the size of the Food Safety Team might need to increase and noted that the Food Standards Agency (FSA) were in regular contact with the local authority to assess progress. The Chairman commented that whilst the FSA were content with the Plan that Bromley had proposed they recognised that the backlog would not be cleared this year. .

The Head of Trading Standards and Community Safety said that he would be reporting back to the Assistant Director for Public Protection and Enforcement in either January or February 2023 and that the update would be noted on the Performance Overview report.

RESOLVED that the Portfolio Holder be recommended to approve the Food Safety Service Plan for 2022-2023 (Appendix A of the report).

**100 CONTRACTS DATABASE REPORT AND DATABASE
EXTRACT**

ES20212

Members were pleased to note that the Mortuary Contract had been successfully extended.

RESOLVED that the Contracts Register update report be noted.

**101 SCRUTINY AND MINUTES OF THE PREVIOUS MEETING OF
THE SAFER BROMLEY PARTNERSHIP STRATEGIC GROUP--
27th OCTOBER 2022**

The Chairman said that he also sat on the Bromley Mentoring Initiative Group. He expressed concern regarding the number of young people entering the Youth Justice System (YJS) for the first time in Quarter 2 (40). He said that the BMI could only take young people that had been referred and from the number of young people continuing to enter the YJS he felt that more referrals were needed from the Youth Justice Service. The Chairman intended to write to the SBP Safer Bromley Partnership) concerning this and ask why referrals were not being passed from the Youth Justice Service to the BMI. This would be noted in the same letter that outlined the Committee's concerns regarding the problem of motorists driving under the influence of drugs and alcohol. This was supported by Members.

The Chairman referenced a group called 'RAW' which was a group that focused on reducing offending and re-offending. He suggested that BYC could be part of this in terms of a consultancy role. The BYC Chairman said that he would put forward this idea to BYC and report back.

It was clarified that with respect to the £100k 'detiment that had been saved' by Trading Standards, this was the result of work undertaken by the Door Step Crime and Rapid Response Team.

The Chairman expressed concern regarding the Mayor's Office for Policing and Crime (MOPAC) statistics relating to crime levels across the board. The Chairman said that he would like to see more reporting and discussion concerning the lack of trust in the police force.

The Vice Chairman raised concerns regarding Ring Door Bells. There had been incidences of burglary where images of the suspects had been recorded on the Ring Door Bells (in some instances actual faces) but it was being reported on social media that the police were not investigating due to lack of staff to examine the images. The Vice Chairman said that she intended to raise this matter with the Safer Neighbourhood Board and also possibly with MOPAC.

**RESOLVED that the minutes of the Safer Bromley Partnership be noted
and that the Vice Chairman refer the issue of Ring Door Bell images to
the SNB and possibly MOPAC**

102 UPDATE ON THE CONTAMINATED LAND STRATEGY

ES 20194

The Chairman said that this was a joint report with the ECS PDS Committee and that the PP&E PDS Committee was involved because of any enforcement aspects that may arise. The Council had not formerly identified any contaminated land but he wondered if a strategy existed so that contaminated land could be identified if required.

A discussion took place concerning the difference between contaminated land and land that had been affected by contamination. There were legal issues involved that regulated what information could and could not be released. It was agreed that an update regarding this should be provided on the Matters Arising report for the next meeting.

In terms of how the Council fulfilled its responsibilities regarding contaminated land, the Assistant Director for Public Protection & Enforcement explained that these duties and responsibilities would be managed through the Planning regime and the Development Control Committee. It was agreed that a fuller response to this matter could be provided on the Matters Arising report for the next meeting.

RESOLVED that the Portfolio Holder for Sustainability, Green Services and Open Spaces be recommended:

- 1) To approve the adoption of the finalised Contaminated Land Strategy 2022.**
- 2) To agree to the delegation of authority to the Assistant Director of Public Protection & Enforcement to make minor changes to the Strategy post adoption, should it be required.**

103 FLY TIPPING ACTION PLAN UPDATE

ES20210

The Street Enforcement Manager said that a new fly tipping database was being developed and he was hoping to see an increase in actions in the coming year. He had developed new templates that would be used for notices that would be served based on Section 108 of the Environment Act 1995. He highlighted various cases that were going to court in the next few months. The Council were working with Veolia to increase patrols and enforcement actions. There was mention of the campaign initiated by Veolia called 'Your Waste was Your Responsibility' which seemed to be a successful campaign.

The Street Enforcement Manager informed the Committee that bulky household waste was the main type of fly-tipping in Bromley. In line with Defra recommendations, the Council was adopting a policy of supplementing enforcement action with engagement. This approach was adopted during a site visit to Mottingham on the 24th of August 2022. This campaign was

supplemented by banners on Veolia vehicles highlighting how bulky waste should be correctly disposed of. The campaign had been shortlisted for 'Campaign of the Year' at the National Recycling Awards which was due to take place on the 6th of December 2022.

The Street Enforcement Manager explained that in some cases cautions were used when it was not in the public interest to prosecute. There was currently a live warrant outstanding for the owner of a skip company who had failed to attend court. An operation had been conducted jointly with the Met Police recently and two vehicles had been seized. That particular case was due to be heard in court on the 13th of December 2022. Further live investigations were underway. Also on the 13th of December, another case was being heard in court concerning a waste carrier who had failed to produce written transfer notes on request.

The Committee was interested to note that new CCTV was being introduced along with artificial intelligence, which would report immediate changes to the landscape and send images of fly tipping to the Enforcement Team so that officers could respond quickly. More training was also planned for officers. Partnership work was being undertaken with Kent and Sevenoaks Council.

A Member enquired about the recovery of court costs and if this data was available. The Street Enforcement Manager responded and said that the Council did have a cost schedule and that this detail was available. It was agreed that some detail concerning this would be provided on the Matters Arising report at the next meeting.

Members discussed the issue of dog fouling and the actions that were being undertaken by Ward Security and Veolia with respect to both dog fouling and littering. It was felt that 'dog fouling signage' was effective and that this should be used as a deterrent measure along with increased publicity regarding prosecutions.

RESOLVED that

The Fly Tipping Action Plan update be noted and that an update be provided on the Matters Arising report at the next meeting concerning the allocation of court costs with respect to fly-tipping prosecutions.

104 PUBLIC PROTECTION AND ENFORCEMENT RISK REGISTER

ES20216

The Assistant Director for Public Protection and Enforcement referenced the risk associated with the Out of Hours Noise Service. This was normally staffed on a voluntary basis, but the uptake of volunteers had been limited and so this was still an area of risk. More work was required to confirm arrangements for the future operation of the service, particularly if no external funding was forthcoming. An update report would be presented at the January PP&E PDS meeting. The risk associated with the cost of the Coroner's Service was

discussed. The Service was requesting a greater financial contribution from Bromley. The reason for the increased costs had been attributed to 'high risk post mortems'. The matter was being discussed by the four authorities in the consortium.

RESOLVED that the update on the PP&E Risk Register be noted.

105 WORK PROGRAMME

CSD 22124

It was clarified that the first meeting of the new year would be on the 31st of January 2023.

RESOLVED that the Work Programme be noted.

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

107 CONTRACTS REGISTER PART 2 (CONFIDENTIAL)

Members noted the Part 2 version of the Contracts Register Database.

**RESOLVED that the Part 2 version of the Contracts Register Database
be noted.**

The meeting ended at 9.25 pm

Chairman

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Minute Annex

PPE PDS Meeting: 15th November 2022

Public Questions

1) Question from Dermott McKibbin:

Has the owner of the house in multiple occupation property in Avondale Road Mottingham, (that the Council prosecuted for failing to obtain planning permission), now registered this large property multi-occupied, with the Council's Environmental Health Department.

Response to Question 1:

Public Protection and Enforcement's Housing Enforcement Team recently (Nov 22) successfully prosecuted an owner of an HMO (House in Multiple Occupation) on Avondale Road for failing to licence it with LBB. The owner is yet to apply for a licence and if this is not received further action will be taken.

2) Question from Dermott McKibbin:

Why does the Portfolio Plan not refer to the Borough's Housing Strategy's recommendation "to introduce mandatory licensing for HMOs of all sizes and invest in resources to monitor and enforce this" Is this still council policy?

Response to Question 2

This area of work was not scheduled for the 2022-23 Portfolio Plan as other operational and covid recovery priorities had to take precedence. Public Protection's Housing Enforcement Team will be working with Housing Services on the delivery of commitments set out in the Housing Strategy for 2019-2029. .

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Minute Annex

PPE PDS Meeting: 15th November 2022

Questions from Councillors

1) Question from Cllr Kathy Bance:

We Cllrs are receiving requests from residents urging us to take action to stop the outdated practice of giving away pets – namely goldfish – as prizes. Does Bromley support the RSPCA's Motion and if so, should this committee make a recommendation?

Response to Question 1:

Thank you for your question and we totally endorse the sentiments you set out regarding the giving away of goldfish as prizes.

Unfortunately, as there is no Government legislation in this respect, the Council's hands are somewhat tied when it comes to events on private land, where we can only advise.

However, Idverde has confirmed that whilst their own operations have not offered pets for prizes for over 10 years, they are currently redrafting their Events Strategy and will be adding a line formalising the fact that pets for prizes are not permitted at any events in Bromley's parks and open spaces.

This will also be added in the event Terms & Conditions.

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Agenda Item 6

Report No.
CSD 23022

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: Public Protection and Enforcement PDS Committee

Date: 31st January 2023

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: 2022/2023 revenue budget
-

Staff

1. Number of staff : 6 FTE
 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>
Minute 98 Matters Arising 15 th Nov 22	The Chairman tabled a report from the Daily Mail dated November 9th 2022, which expressed the view that 2021 was 'the most dangerous year ever on our roads'. He requested that the article be sent to the Safer Bromley Partnership. It was hoped that dealing with motorists under the influence of drugs and alcohol could be incorporated into the new Safer Bromley Partnership Strategy.	The Daily Mail Article has been disseminated to the Safer Bromley Partnership and the matter of dealing with motorists will be taken into consideration when the new Strategy is being developed.
Minute 101 SBP Scrutiny 15 th November 22	It was resolved that the minutes of the Safer Bromley Partnership be noted and that the Vice Chairman refer the issue of Ring Door Bell images to the SNB and possibly MOPAC.	<p>On 18th January 2023, the Vice Chairman attended the Orpington Ward Safer Neighbourhood Panel - and asked Sgt Alex Farmer whether there was an update to ensure that images of suspects committing crimes and caught on ring door bells were properly investigated by the Police – he responded that Bromley Police took this matter seriously and had a unit and procedures in place to ensure this was done.</p> <p>This was a follow up action from the Vice Chairman and the SNB Chairman after previously raising the matter with the Borough Commander (David Stringer) at the Safer Neighbourhood Panel Summit held in the Council Chamber on the 15th October 2022</p>
Minute 103 Fly Tipping Action Plan 15 th November 22	It was resolved that the Fly Tipping Action Plan update be noted and that an update be provided on the Matters Arising report at the next meeting concerning the allocation of court costs with respect to fly-tipping prosecutions.	<p>The Council has successfully prosecuted three individuals in the past year, for offences linked to fly tipping (press releases to follow).</p> <p>The courts awarded costs of £250 (application for £337.50 investigation costs), £200 (application for £120 investigation costs) & £200 (no costs application made) for these cases, total £650. The individuals will repay the costs direct to HMCTS and these are then passed to Bromley.</p> <p>It is planned that in the near future contact will be made with the local Magistrates court to raise Bromley concerns on the lack of costs awarded and low sentences being passed.</p>

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Report No: ES20237	PP&E Performance Overview (2022/23)																	
Outcome	Portfolio Plan Indicator	Description	2021-22 Target	2021-22 Actual	Good Perf.	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	2022-23 Projection	2022-23 Target	2022-23 RAG Status	RAG Threshold	Commentary (By Exception)
1: We will keep Bromley safe	1A	Number of Community Impact Days	12	12	HIGH	1	1	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)	100%	100%	HIGH	NA	NA	NA	N/A	N/A	NA	NA	NA	100%	100%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
	1C	Number of Safer Bromley Partnership Boards held	N/A	N/A	HIGH	0	1	0	0	(1 of 1) 100%	0	(1 of 1) 100%	1	4	4	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
	1D	Number of quarterly reports provided by Public Protection to the Safer Bromley Partnership Board	N/A	N/A	HIGH	0	1 of 1 (100%)	0	0	(1 of 1) 100%	(0 of 0) N/A	(1 of 1) 100%	(1 of 1) 100%	4	4	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
	1E	Number of Prevent Boards attended	N/A	N/A	HIGH	(0 of 0) 100%	1 of 1 (100%)	(0 of 0) 100%	1 of 1 (100%)	(0 of 0) - N/A	(1 of 1) 100%	(0 of 0) 100%	(1 of 1) 100%	4	4	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
	1F	Completion of Covid returns (outcome)	N/A	New KPI 22/23	OUTCOME	N/A	NA	NA	N/A	NA	NA	NA	NA	100%	100%	OUTCOME	Red: more than 10% Amber: Within 10% Green: At target or above	
2: We will protect consumers	2A	Number of awareness raising events & training to groups & partners (No. of attendees)	20	20	HIGH	6 events (156 attendees)	2 events (70 attendees)	5 events (112 attendee)	2 events (60 attendee)	1 event (25 attendees)	4 events (77 attendees)	3 events (75 attendees)	6 events (165 attendees)	740	50	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
	2B	Rapid Response interventions responded to within 2 hours (%)	100%	100%	HIGH	3 (100%)	2 (100%)	2 (100%)	2 (100%)	3 (100%)	0 (100%)	3 (100%)	2 (100%)	100%	100%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
	2C	Complete test purchases following all failed Challenge 25 test purchases which result in a sale of an age restricted product	20	20	HIGH	5 out of 7 (71%)	0 (71%)	0 (71%)	0 (71%)	5 of 5 (71%)	0 (71%)	3 sales from 11 (73%)	0 (73%)	73%	100% Compliant Businesses	RED	Red: more than 10% Amber: Within 10% Green: At target or above	Under Age Sales (UAS) is currently at 0, but 1 business is still remaining as non-compliant. This premises was subject to a sale to a Challenge 25 (C25) young adult volunteer. This trader, along with 4 others, who also sold to a C25 volunteer, will be subject to underage test purchase in Q4 to confirm compliance. Both outstanding non-compliant businesses were tested in Q3; one as above remains non-compliant, but the other refused to sell to the young adult volunteer and thus is now compliant.
	2D	To disseminate 25 Alerts on emerging topics including doorstep crime and scams	N/A	New KPI 22/23	HIGH	2	4	6	4	3	3	3	2	41	25	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
3: We will support and regulate businesses	3A	Due inspections of high-risk food businesses undertaken % (Annual Target)(Risk A and B food premises)	N/A	Risk A - 2 out of 2 - 100% Risk B - 34 out of 37 - 92%	HIGH	Risk A 0% (0 out of 7) Risk B 2% (2 out of 84)	Risk A 0% (0 out of 7) Risk B 3% (3 out of 84)	Risk A 28% (2 out of 7) Risk B 3% (3 out of 84)	Risk A 71% (5 out of 7) Risk B 4% (4 out of 84)	Risk A 71% (5 out of 7) Risk B 7% (6 out of 84)	Risk A 63% (7 out of 11) Risk B 23% (20 out of 84)	Risk A 72% (8 out of 11) Risk B 31% (26 out of 84)	Risk A 81% (9 out of 11) Risk B 52% (44 out of 84)	Risk A: 48% Risk B: 17%	100% (Annual Target)	RED	Red: more than 10% Amber: Within 10% Green: At target or above	There were 7 Category A premises and 84 Category B premises that are due to be inspected at the beginning of this year (2022/23). As the year has progressed a further 4 Category A premises have been added to the inspection list in September as Category A premises are inspected at 6 month intervals. The addition of the 4 Category A premises is an indication of falling food safety standards. The businesses will be inspected in accordance with the Food Law Code of Practice (FLCoP) when the inspections are due. It is anticipated that 100% of the due food hygiene inspections (Cats A & B) will be completed by March 2023.
	3B	Due food hygiene (FH) inspections of all food businesses undertaken % (Annual Target)	N/A	N/A	HIGH	All FH 0.5% (3 out of 541)	All FH 3% (17 out of 541)	All FH 6% (31 out of 541)	All FH 7.5% (41 out of 541)	All FH 13.5% (69 out of 541)	All FH 22% (120 out of 541)	All FH 28% (154 out of 541)	All FH 37% (203 out of 541)	15%	100% (Annual Target)	RED	Red: more than 10% Amber: Within 10% Green: At target or above	There are a total of 541 food premises (Cats A to E) due for inspection this year. In accordance with the food law code of practice, it is anticipated that 100% of the due food hygiene inspections (Cat A to E) will be completed as the inspections fall due, by March 2023. The team still has one vacant full time post.
	3C	Inspection of UNRATED (UR) food businesses (FB)% completed (Number of inspections or closures if no longer trading)	N/A	N/A	HIGH	UR FB 10% (40 of 387) UR CM 0% (0 of 433)	UR FB 19% (75 of 387) UR CM 0% (0 of 433)	UR FB 30% (116 of 387) UR CM 0% (0 of 433)	UR FB 39% (154 of 387) UR CM 0% (0 of 433)	UR FB 49% (190 of 387) UR CM 0% (0 of 433)	UR FB 56% (218 of 387) UR CM 0% (0 of 433)	UR FB 60% (228 of 387) UR CM 0% (0 of 433)	UR FB 60% (237 of 387) UR CM 0% (0 of 433)	UR FM = 40% UR CM = 0%	100% (Annual Target)	RED	Red: more than 10% Amber: Within 10% Green: At target or above	There are currently 820 unrated food businesses split into two main types. Type 1 - UNRATED FOOD BUSINESSES, total 387 premises, includes a large number of home caterers. It is anticipated to visit all of these premises by March 2023 in line with the FSA recovery plan. Type 2 - UNRATED CHILD MINDERS, total 433 premises. These businesses are currently not registered and the food team received notice of their existence in January 2022. These businesses will be triaged to separate them into HIGH risk and LOW risk. The HIGH risk will be prioritised but completion of all the inspections in this business year is unlikely without additional resources. The FSA are aware of this risk
	3D	Overdue (OD) food hygiene inspections of food businesses undertaken % completed)	N/A	N/A	HIGH	OD 5% (54 of 1089)	OD 16% (179 of 1089)	OD 18% (195 of 1089)	OD 23% (256 of 1089)	OD 30% (314 of 1089)	OD 38% (414 of 1089)	OD 40% (441 of 1089)	OD 46% (508 of 1089)	27%	100% (Annual Target)	RED	Red: more than 10% Amber: Within 10% Green: At target or above	On the 31st March 22 there were 1089 overdue inspections of Cat C to E food premises. This is due to the disruption to the food team's inspection programme caused by the Covid-19 pandemic. These inspections will be addressed as per the FSA recovery plan with a target of completion by March 2023 if resources permit. However, intelligence received shows that food hygiene standards have fallen post pandemic. There is also a risk that this target will not be met if inspections are complicated by the need for enforcement action. The two agency staff employed until the 30th of September to deal with these inspections have left the team now. It is unlikely that these outstanding inspections will be completed this business year without further additional resources / agency staff employed beyond the 30th of September 2022. This risk will be communicated to the FSA.
	3E	Respond to 70% of food safety complaints within 5 working days (%)	70%	86%	HIGH	84% (21 out of 25)	100% (37 out of 37)	91% (21 out of 23)	86% (26 out of 30)	100% (35 out of 35)	94% (17 out of 18)	89% (33 out of 37)	93% (28 out of 30)	92%	70%	GREEN	Red: more than 30% Amber: Within 20% Green: Within 10% or above	

Outcome	Portfolio Plan Indicator	Description	2021-22 Target	2021-22 Actual	Good Perf.	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	2022-23 Projection	2022-23 Target	2022-23 RAG Status	RAG Threshold		Commentary (By Exception)
4: We will protect and improve the environment through custodianship and effective and responsible enforcement	4A	Supply of CCTV data on request by appropriate agencies	100%	100%	HIGH	100%	100%	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	N/A	100%	OUTCOME	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above		
	4C	Completed cases where investigations of breaches of planning control are identified (%) (outcome)	N/A	N/A	OUTCOME	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	100%	100%	OUTCOME	Awaiting Data		
	4D	Issue HMO licenses where valid applications are received (No.)	100%	N/A	HIGH	(4 out of 4) 100%	(5 out of 5) 100%	(6 out of 6) 100%	(4 out of 4) 100%	(4 out of 4) 100%	(6 out of 6) 100%	(9 out of 9) 100%	(7 out of 7) 100%	100%	100%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above		
	4E	Total Number of Fly-tipping incidents (No.)	N/A	3576	OUTCOME	251	277	303	340	387	339	301	292	3735	N/A	OUTCOME	N/A		
	4F	Total Number of open fly-tipping incident investigations (No.)	N/A	N/A	OUTCOME	5 (open for period April)	14 (open for period April to May)	18 (open for period April to June)	12 (open for period April to July)	34 (open for period April to August)	53 (open for period April to September)	53 (open for period April to October)	85 (open for period April to November)	N/A	N/A	OUTCOME	N/A		
	4G	Fly-tipping % of closed cases where action has been taken (those where evidence was available) (%)	50%	48%	OUTCOME	30% (10 cases closed after investigation for April. Of 10 cases, 3 have had enforcement action which is the 30%).	47% (21 cases closed after investigation for April to May). Of 21 cases, 10 have had enforcement action which is 47%).	42% (28 cases closed after investigation for April to June). Of 28 cases, 12 have had enforcement action which is 42%).	36% (38 cases closed after investigation for April to July). Of 38 cases, 14 have had enforcement action which is 36%).	55% (43 cases closed after investigation for April to August). Of 43 cases, 24 have had enforcement action which is 55%).	88% (50 cases closed after investigation for April to October). Of 43 cases, 24 have had enforcement action which is 88%).	82% (63 cases closed after investigation for April to September). Of 63 cases, 52 have had enforcement action which is 82%).	69% (99 cases closed after investigation for April to November). Of 99 cases, 69 have had enforcement action which is 69%).	50%	50%	OUTCOME	N/A		
	4H	Parking appeals heard by the Environment and Traffic Adjudicators (ETA) against PCNs issued by LBB (No.)	200	240	LOW	15	21	29	8	12	17	17	29	222	200	GREEN	Red: More than 251 Amber: 226 to 250 Green: 200 to 225		
	4I	Parking ETA cases won by LBB (% of cases heard)	75%	83%	HIGH	100%	95%	76%	63%	67%	88%	65%	79%	79%	85%	AMBER	Red: Less than 70% Amber: Less than 85% Green: At target or above	Officers continue to review decision to ensure that lessons are being learnt from any allowed cases.	

ENDS

Agenda Item 9a

Report No.
ES20254

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: Public Protection & Enforcement Portfolio Holder

Date: 31st January 2023

Decision Type: Non-Urgent Executive Key

Title: Out of Hours Noise Service

Contact Officer: Sarah Newman, Head of Service
Community Safety, Licensing, Environmental and Domestic Regulation
E-mail: sarah.newman@bromley.gov.uk

Chief Officer: Colin Brand, Director
Environment and Public Protection
Email: colin.brand@bromley.gov.uk

Ward: All wards

1. Reason for decision

- 1.1 The Public Protection Division's Out of Hours Noise Service (OOHNS) has been operating a revised service since September 2021, following Non-Key Decision (ES20111) 'Proposed Changes to Out of Hours Noise Service'. It was agreed to review the revised service in September 2022.
 - 1.2 Following an initial Options Appraisal produced in September 2022 revised options have been developed and are presented here.
 - 1.3 This report assesses the current demand for OOHNS, reviews the current arrangements in place and presents an Option Appraisal for a revised service going forward.

2. RECOMMENDATION(S)

That the Committee;

- i) Note the current service demand trends.
 - ii) Note the review of the current service.
 - iii) Consider the delivery options for future OOHNS provision.
 - iv) That the Portfolio Holder agrees that Option 4 is the OOHNS delivery option recommended to be adopted.

Impact on Vulnerable Adults and Children

1. The OOHNS benefits all residents but is of particular benefit to residents who wish to concentrate, recover, relax, rest, or sleep, without undue disturbance. This can include vulnerable adults and children.
-

Transformation Policy

1. Policy Status: Not Applicable
 2. Making Bromley Even Better Priority 4, 'For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future'.
-

Financial

1. Cost of proposal: Estimated Cost £ 80,080
 2. Ongoing costs: £0
 3. Budget head/performance centre: Public Protection, Nuisance and ASB Team
 4. Total current budget for this head: £30K
 5. Source of funding: £30k grant from the Mayor's Office for Policing and Crime, London Crime Prevention Fund (MOPAC); £50,080 growth bid agreed.
-

Personnel

1. Number of staff (current and additional): 1.2FTE New Posts
 2. If from existing staff resources, number of staff hours: Nil
-

Legal

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

Procurement

1. Provision of training package for relevant staff, PPE, bodycams and lone working device.
-

Property

1. Welfare, office and ICT facilities to be provided for the hours of operation for the OOHNS.
-

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: There are no significant implications.
-

Customer Impact

1. In the year 1st November 2021 to 31st October 2022 a total of 2,263 noise complaints were received by the Nuisance and ASB Team. Of which 645 (29%) were referred to the OOHNS under the current service criteria.

2. Of the 2,263 noise complaints received 1,595 (70%) were made outside of Council business hours.
 3. Potentially all Bromley residents benefit from this service.
-

Ward Councillor Views

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

3. COMMENTARY

Legal Position

- 3.1 Local authorities have a statutory duty to investigate reports of noise and statutory nuisance. It is for each local authority to determine their service offer.
- 3.2 There is no statutory requirement for local authorities to have an OOHNS.
- 3.3 Further details are stated below in Section 8.

History of LBB's OOHNS Provision

- 3.4 A summary of the historical service provision for the voluntary OOHNS at LBB was presented to PPE PDS Committee (ES20111) in September 2021. That report detailed the variations in service provision made since 2011.
- 3.5 During the lockdown periods of the COVID-19 pandemic the OOHNS continued to operate with its working methods adjusted in line with the prevailing governmental controls and advice. The service reverted to its pre-pandemic operating model following the removal of wider pandemic controls and guidance and is currently operating as detailed below.

Current OOHNS Provision

- 3.6 The service operates 365 days per year on a rolling 4-day shift pattern. The operating hours are:
 - Monday to Friday 6pm until 1am (7 hours per day).
 - Saturday, Sunday & Bank Holidays 10am until 1am (15 hours per day).
- 3.7 The service currently responds to:
 - Cases placed on the Referral List.
 - Intruder alarms sounding for longer than 20 mins as they are designed to attract attention and cut-out 15 to 20 minutes after activation.
 - Construction noise occurring outside of the Council's permitted hours when a permit has not been granted.
 - Significant public impact events previously reported to the service.
- 3.8 For every visit conducted a dynamic risk assessment is completed by the duty officer. This will determine whether it is safe to conduct the visit to witness and/or intervene. To support staff to do this training is provided on lone working, dynamic risk assessment, relevant laws, and procedures. A Manual with this, and other relevant information, is provided to duty officers together with telephone support from colleagues and managers on request during their shift. Finally appropriate PPE is provided i.e., bodycams.

Service Demand

- 3.9 Analysis of 1 year's data from 1st November 2021 to October 2022 will be presented in this report for the following reasons.
 - The Covid 19 pandemic caused a significant increase in the number of service requests being made to the Nuisance and ASB Team. Disproportionate volumes would have otherwise been presented if officers had taken multiple year averages.

- The Customer Service Centre is managed under contract to Liberata during business hours and to Appello outside of business hours. System improvements introduced in September 2021 allowed Appello to log complaints in Uniform (case management system within Public Protection) as they occurred. Prior to this change Appello were unable to access the Uniform system. This meant that all complaints were dated and entered into Uniform by Liberata on the next working day. This would disproportionately show complaints made outside of business hours, Friday through to Sunday as having occurred on Monday.

3.10 This analysis of service demand for the OOHNS is shown in the tables within Appendix 1.

- Table 1 shows that the Nuisance and ASB Team received 2,263 complaints of noise nuisance in the year ending October 2022. 70% (1,595) of these complaints were reported outside of Council business hours.
- Table 2 details how the complaints were received by the Council outside of business hours, 54% (866) were reported via telephone to the Customer Service Centre with 39% (628) being reported by webform on the Council's website.
- Of the 866 complaints reported by telephone, 645 met the criteria as detailed above (3.7) to be referred to the OOHNS. Table 3 details these referrals by the type of noise complaint and shows the day on which they occurred. Domestic noise is the most common complaint at 58%, followed by construction noise at 18%. The OOHNS is relied upon most at weekends, making up 63% of total complaints.
- Table 4 analyses the time period in which complaints are made. Complaints investigated by the OOHNS during the weekdays are relatively evenly spread throughout the operational hours of the service. Chart 1 (Weekdays) show that complaints from construction noise are highest as soon as the OOHNS opens reducing at around 8pm. Domestic and Commercial Noise are the most common complaint which are responded to throughout the night.
- Chart 2 analyses the complaints over the weekends which primarily consist of the same. The service initially deals with construction noise on Sunday mornings and Saturday post the permitted hours of 1pm. Domestic noise complaints begin to be made late afternoon and increase throughout the evening, peaking after 12pm until the current service ceases operation at 1am.
- Table 5 shows that the OOHNS demand is at its highest during the months of May through to the end of August.

Comparison of OOHNS both pre and post September 2021

- 3.11 Since September 2021 the current service presented to PPE PDS Committee (ES20111) in September 2021 has been operating. Despite regular requests to staff to join the OOHNS rota, staff levels have remained at 3 officers. This is a sub-optimal level of staffing as on occasion there is no-one available to work on the rota and the service has been stood down.
- 3.12 To minimise the impact of low staffing on both the operational officers and the service, the length of time staff are on-call was reduced to 4 days. This operational change was to reduce the impact of a 7 day on-call period on staff, increase the chance of staff availability, and minimise the length of time when the service might be unavailable.
- 3.13 The Table below compares the OOHNS pre and post September 2021.

	12 months pre-Sept 2021	12 months post-Sept 2021	Comment

Operational hours	Mon – Fri 17.00 – 03.00 Sat, Sun & BH 08.00 – 03.00	Mon-Fri 18.00 – 01.00 Sat, Sun & BH 10.00 – 01.00	Reduction in hours
Total cost	£27,642	£24,760	Reduction in cost. Staff are paid slightly more for less hours for being on-call post Sept 2021
No of regular volunteer staff on rota	3	3	No improvement
No of days on staff rota	7	4	Reduced no. of days that the staff on rota are on-call
No. of days the service was not available due to no staff volunteers	0	25	

- 3.14 Over the last 2.5 years there have been 6 formal complaints about the noise service within Public Protection of these 1 was upheld. Hence, compared to the level of cases dealt with in this time it can be surmised that dissatisfaction with the service provided is low.
- 3.15 The adjustment to the service's operational hours has not caused a significant change in the quality of the service provided as the service still covers the periods of peak demand. However, the persistent lack of volunteers for the OOHNS rota means there is no resilience. The 3 staff on the rota are effectively on-call for 4 days, have 8 days off, then are back on call. Following a poll of Public Protection officers in the service, the 3 main reasons officers gave for not taking part in the OOHNS have included insufficient reward, impact of late working when working the next day, and impact on private life and care responsibilities.
- 3.16 The marginal adjustments made to operational hours and pay since September 2021 have not succeeded in making volunteering for the rota more attractive to officers from across the Division.
- 3.17 The OOHNS remains **RED** rated on the departmental risk register. Further change should be considered to mitigate this persistent risk.
- 3.18 The suspension of the Party Patrol Service, which responsively addressed one-off complaints regarding noisy households on Saturday nights/Sunday mornings, has had no discernible impact on customer satisfaction.
- 3.19 Complaint data shows that service demand is greatest at the weekend when there are 4 times more officer call outs than received on a weekday.

OOHNS Funding

- 3.20 The OOHNS is currently exclusively funded by a £30k grant from the Mayor's Office for Crime and Policing's (MOPAC) London Crime Prevention Fund. LBB recently took the option to extend the MOPAC grant for a further 3 years from 1st April 2022 to 31st March 2025. The bid application was approved, and this funding now is in place until March 2025. The current service is costed to fit within this parameter.
- 3.21 The MOPAC grant amount has remained static for several years, thus the value of the grant has reduced over time. MOPAC has not considered inflationary pressures, so, there will continue to be an effective reduction in the OOHNS budget year on year. To get officer reward to an attractive level, within current fiscal constraints, the authority could consider reducing the operational hours of the OOHNS and/or supplementing the grant, or both.

Challenges and mitigation

- 3.22 The current level of reward for being on-call, with no extra reward for responding to calls, which on summer weekends are numerous each day, is not perceived by staff as being ‘worth it’ to give up their private time.
- 3.23 As the number of active staff on the rota has diminished the regularity of being on call, for a member of staff on the rota, has significantly increased, causing more staff to withdraw and a cycle of decline.
- 3.24 As staff on the rota must attend site at short notice, being on-call is a significant imposition on their private lives. Staff with care responsibilities generally do not take part due to difficulty arranging and paying for alternative care. The current rates of pay would not cover the cost of alternative care provision.
- 3.25 Being on the rota means staff have behavioural restrictions and must significantly adjust and limit their activity, such as:
- Not socialising far from home/Bromley – to enable reasonable response times.
 - Abstaining from alcohol – they will likely be required to drive.
 - Not going for long walks, cycle rides, etc. or being away from their cars for any length of time to enable reasonable response times.
- 3.26 As being on the OOH rota is voluntary, there is no management mechanism to require staff to join or stay on the rota. To ensure cover and service resilience the number of staff required on the rota is a minimum of 6, preferably 8. As stated in para. 3.11, the current rota staffing level is inadequate at 3.
- 3.27 The rates of pay for being on-call on the OOHNS were reviewed and marginally increased in August 2021. Current staff pay exceeds the standard level of call-out pay. Due to the precariousness of the service, its staffing difficulties, and the certainty of being called out on numerous occasions, the standard level of call-out pay was deemed inappropriate to this service area.
- 3.28 The length of time that an officer is ‘on-call’ has been reduced from 7 to 4 days
- 3.29 Regular emails are sent to staff to encourage them to join the rota.
- 3.30 None of the above interventions have improved service stability by encouraging staff a) to not withdraw and b) to volunteer.
- 3.31 During the COVID-19 pandemic many Public Protection staff worked long hours and weekends for an extended period. Since then, despite a small increase in pay and minor reduction in operational hours implemented in September 2021, and a subsequent management reduction of the rota period length from 7 to 4 days, staff continue to not volunteer to take part in the service in sufficient numbers to get the service onto a sustainable footing.

Options Appraisal for the OOHNS

- 3.32 A detailed Options Appraisal has been conducted with 4 key options selected for consideration as defined below.

OPTION	TITLE	TOTAL BUGET UPLIFT NEEDED (-£30k MOPAC)
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1	Continue with current service	£0
2	Close the service	£0
3	Weekend Service Single Officer 6 months/Two Officer 6 months using volunteers.	£42,877
4	Weekend Service Two Dedicated Officers All Year – Permanent/Fixed Term Contract.	£50,080

3.33 The full Option Appraisal is shown in Appendix 2.

3.34 To support the Options Appraisal a benchmarking exercise was completed as shown in Appendix 3. For those that continue to operate an OOHNS, the delivery models are many and varied, taking account of local demand, available funding, total cost, and the prioritisation of the service at each local authority.

3.35 Current ability to intervene in noise issues is limited with only 1 officer on duty. The voluntary basis of the present service means low resilience for service provision. The 7-day service is not needed based on the demand analysis. As a result, Option 1 is not recommended.

3.36 Based on the level of, and increasing, demand predominantly outside of business hours it is deemed that an OOHNS is required. Without a form of responsive OOHNS, residents would lose a valuable, front-line service and it is expected that there would be a significant increase in complaints from residents and businesses. As a result, Option 2 is not recommended.

3.37 Whilst having 2 officers on duty who are fully responsive to all incoming reports of noise issues will increase the level of investigation and intervention in real time, it continues to be voluntary for staff, and unpopular, affecting service resilience. Therefore Option 3 is not recommended.

3.38 The option recommended is Option 4 as it covers peak demand, provides improved staff safety and removes the voluntary basis for staff on duty. As a result, Option 4 is recommended.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

The law pertaining to statutory nuisance specifically does not take individual's vulnerabilities into account, notwithstanding this, the OOHNS benefits all residents but is of particular benefit to residents who wish to work, concentrate, recover, relax, rest, or sleep, without undue disturbance. This can include vulnerable adults and children due to them more likely being at home, more of the time, and potentially less likely to be able to take remedial or evasive action themselves.

5. TRANSFORMATION/POLICY IMPLICATIONS

The recommendations within this report are in line with the current Portfolio Plan for Public Protection and Enforcement, Building a Better Bromley, and the Safer Bromley Partnership Strategy.

6. FINANCIAL IMPLICATIONS

6.1 The existing £30k MOPAC funded budget is insufficient to contain proposed expenditure based on the activity levels detailed within this report for preferred Option 4. There is a potential funding risk if the MOPAC grant is reduced or stopped in future years. If this were to be the case, then the level of budget provision for LBB's OOHNS would need to be reconsidered.

- 6.2 This decision includes a budget growth of £50k in the cost centre R58062 - Out of Hours Noise Service.

7. PERSONNEL IMPLICATIONS

As per the Council's Managing Change procedure, the service will continue to consult with affected staff and Trade Unions regarding the proposed changes.

The current service is provided by Public Protection enforcement staff on a voluntary basis, with a set on-call rate that differs between weekday, weekend, and Bank Holidays. The proposed Option 4 would continue to recruit staff whereby working the OONS would be part of their terms and conditions. Other staff asked to work outside of business hours to investigate noise issues will be paid the contractual overtime rates. The implications of the Working Time Directive may need to be considered regarding the signing of waivers or careful management of the rota i.e Average of 48 hours per week over a 17 week reference period.

8. LEGAL IMPLICATIONS

Under the Environmental Protection Act 1990, local authorities have a statutory duty to take such steps as are reasonably practicable to investigate noise complaints and act to remedy noise if this constitutes a statutory nuisance. This duty is reinforced by S.6 of the Human Rights Act 1998, which makes it unlawful for a local authority to fail to act to protect individual and community rights to private and family life, which includes the impact of serious pollution.

To fulfil these duties local authorities must have adequately resourced and competent officers available to take appropriate action. There is no legal requirement to provide an out of hours service, however, the determination of what constitutes an appropriate level of resource to commit to the noise service is guided by the assessment of local need and an evaluation of staffing, revenue, and operational costs. As such, there is no definition as to what is considered practicable, and the size and type of a noise service varies between Local Authorities. See Appendix 3.

In 2011 the OONHS was reduced from the previous 24hr 7 day a week provision. The tables in Appendix 1 demonstrates that the service provision recommended will cover the periods of highest demand.

9. PROCUREMENT IMPLICATIONS

There are no procurement implications.

10. PROPERTY IMPLICATIONS

There are no property implications.

11. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

There are neutral environmental and carbon reduction implications from the proposals contained in this report. The OOHNS would not be undertaking any activity at night that they wouldn't normally do in office hours, they are doing it at a different time of day when the roads are clearer and journeys smoother, potentially working more efficiently and to a slight environmental benefit. However, office space will need to be heated between 19.00 and 02.00 on Fridays, Saturdays, Sundays, and Bank Holidays, so the slight environmental benefit of one will cancel out the slight disbenefit of the other.

The OOHNS benefits all residents but is of particular benefit to residents who wish to work, concentrate, recover, relax, rest, or sleep, without undue disturbance. The economic implication

is that if individuals and households are unable to undertake the above activities, particularly sleep or recover from illness, due to noise disruption, they will be more likely to be over-tired the next day or be absent from work longer, therefore be less economically efficient.

12 CUSTOMER IMPACT

See para. 4 and 11 and Appendix 3 of this report.

13 WARD COUNCILLOR VIEWS

Not applicable

Non-Applicable Headings:	13 & 10
Background Documents: (Access via Contact Officer)	Report No.ES11095 REVIEW OF THE OUT OF HOURS NOISE SERVICE 26th July 2011 Report No.ES12047 UPDATE ON THE PROVISION OF THE OUT OF HOURS NOISE SERVICE 13th March 2012 Report No.ES20111 PROPOSED CHANGES TO THE OUT OF HOURS NOISE SERVICE 26 th July 2021 OOHNS Preliminary Options Appraisal – July 2022

Appendix 1 – Statistical Tables

Table 1: Total number of Noise Complaints

Number of Requests for Service		Nov-2021 to Oct- 2022	%
Out of Hours	1595	70%	
Business Hours	668	30%	
Grand Total	2263		

Table 2: How Complaints are Reported outside of Business Hours

Number of Requests for Service		Nov-2021 to Oct- 2022	%
Telephone	866	54%	
Web Form	628	39%	
Email	95	6%	
#N/A	4	0.3%	
Letter	2	0.1%	
Grand Total	1595		

Table 3: Number of referrals made by CSC to the Out of Hours Noise Service

Year Name	Nov-2021	Oct-2022	Telephone						
Row Labels	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Grand Total	%
Noise Nuisance - Domestic	29	25	23	20	40	148	86	371	58%
Noise Nuisance - Construction	12	3	9	7	5	36	47	119	18%
Noise Nuisance - Commercial	9	5	5	7	14	34	18	92	14%
Noise Nuisance - General	4	1	1	0	8	8	5	27	4%
Noise Nuisance - Alarm	0	1	3	4	0	4	10	22	3%
Noise Nuisance - Other	3			1	1	2	7	14	2%
Grand Total	57	35	41	39	68	232	173	645	
	9%	5%	6%	6%	11%	36%	27%		

Table 4: Number of referrals made by CSC to the Out of Hours Noise Service by Time Period

Year Name Comms	Nov-2021 to Oct-2022 Telephone	
Time Period	No of Referrals to OOH Service	No of Referrals to OOH Service
	Weekday	Weekend
9 to 10AM	0	0
10 to 11AM	0	20
11 to 12AM	0	19
12 to 13PM	0	17
13 to 14PM	0	25
14 to 15PM	0	18
15 to 16PM	0	16
16 to 17PM	0	15
17 to 18PM	0	15
18 to 19PM	28	14
19 to 20PM	33	14
20 to 21PM	29	29
21 to 22PM	35	37
22 to 23PM	42	39
23 to 24PM	29	45
0 to 1AM	44	82
Grand Total	240	405
	37%	63%
Average No of Daily Referrals to OOHNS*	0.9	3.9

*Totals divided by 261 weekdays in a year and 104 weekend days in a year

Chart 1 - Noise Complaint Type by Time Period during Weekdays

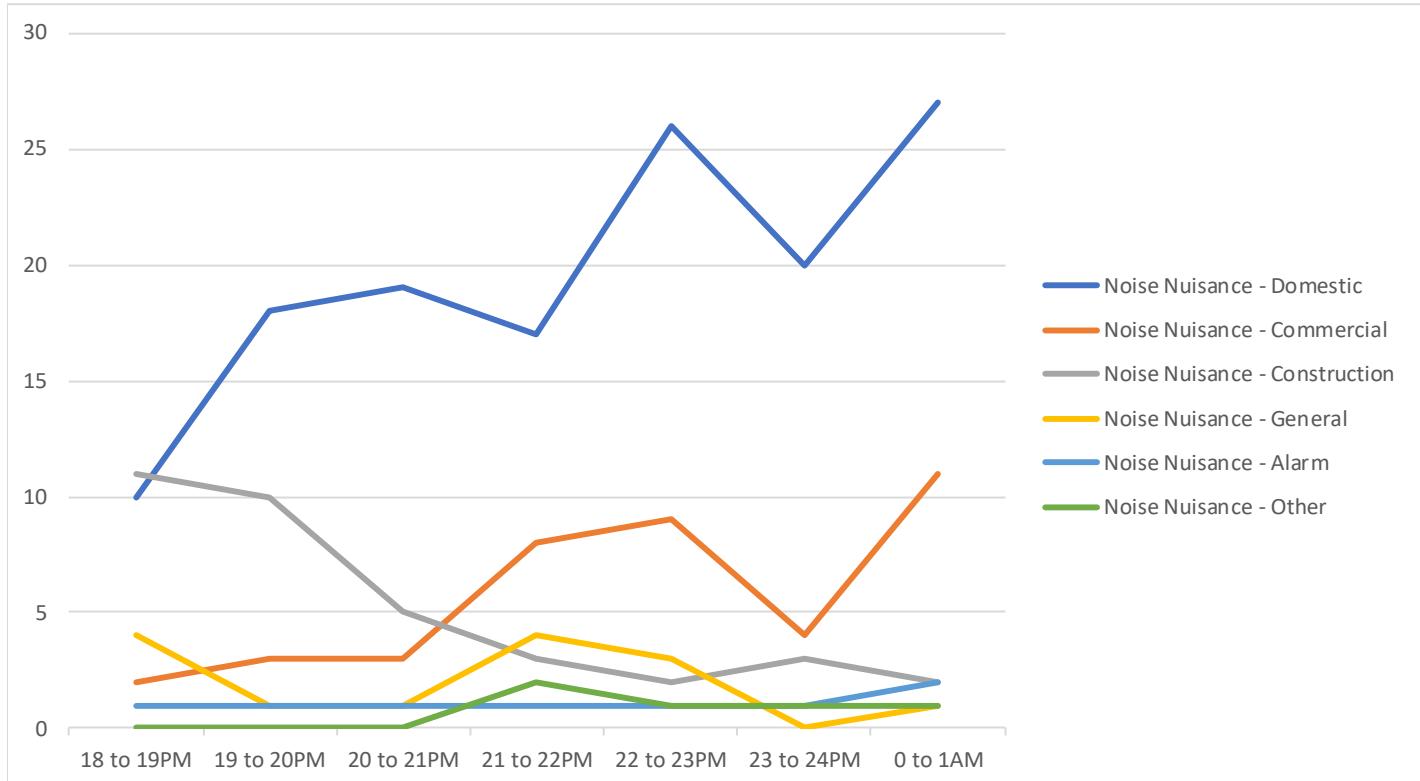


Chart 2 - Noise Complaint Type by Time Period during the Weekends

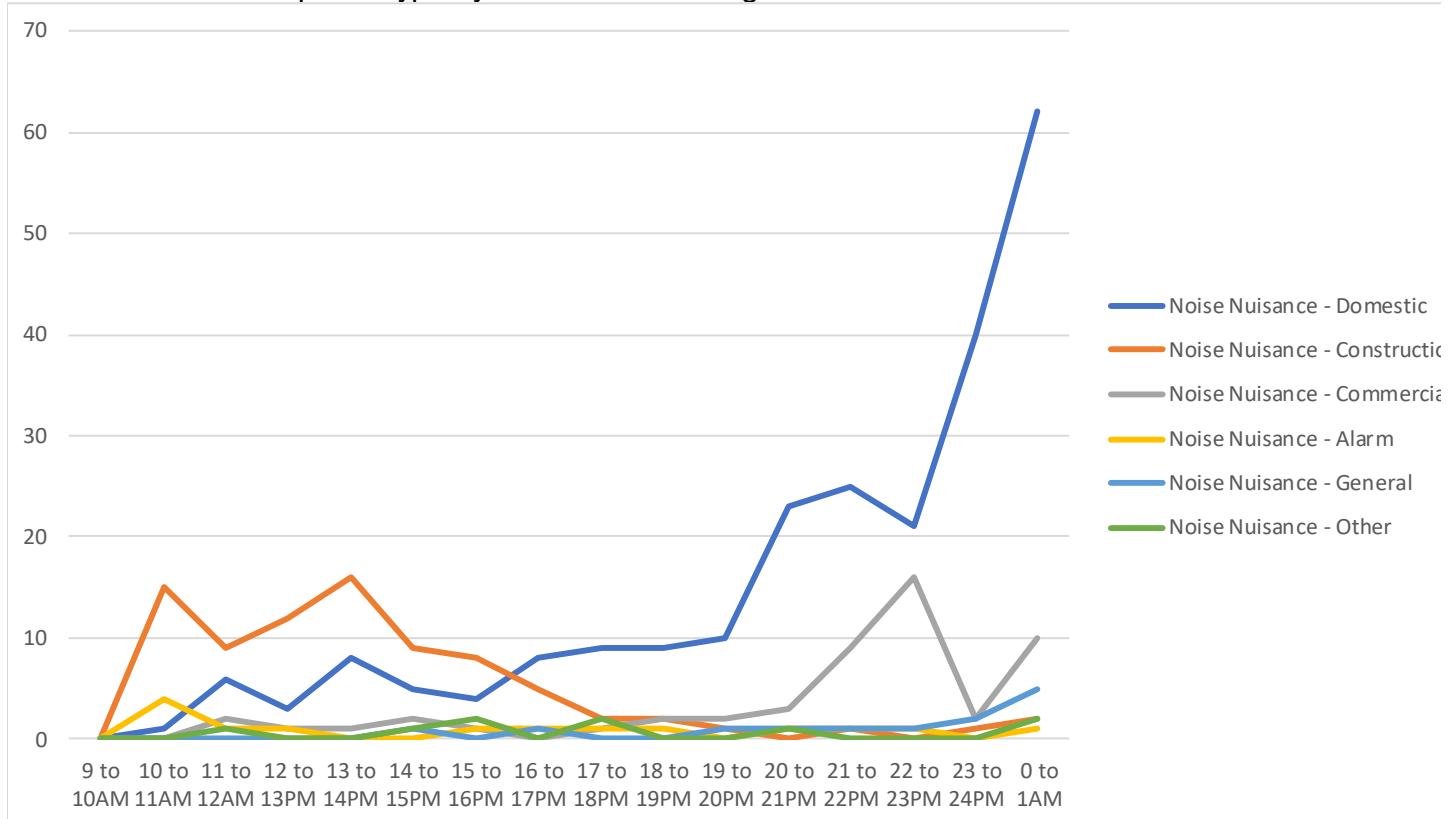
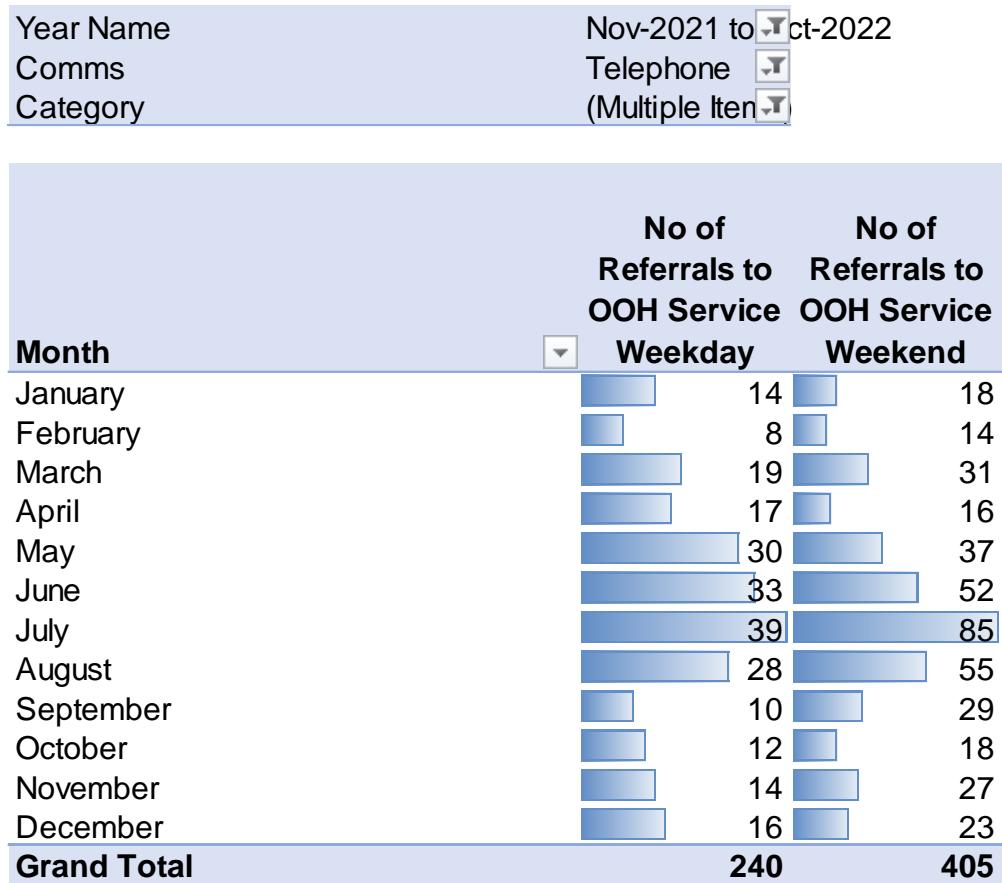


Table 5: Number of referrals made by CSC to the Out Hours Noise Service by Month



Appendix 2 – Option Appraisal

Public Protection Out of Hours Noise Service Options Appraisal			January 2023	
Subject/Item	Option 1	Option 2	Option 3	Option 4
Description	Continue with current service	Close the service	Weekend Service Single Officer 50%/Two Officer 50%	Weekend Service Two Officers All Year – Permanent/Fixed Term Contract
Service Provision	<p>1 officer on stand-by to witness and intervene, when safe to do so, for:</p> <ul style="list-style-type: none"> • empty premises alarms operating >20 mins • significant public impact event • current caseload under investigation • noise issues reported by >1 resident • construction/street works outside standard construction hours 	<p>None - reports of noise issues outside of business hours will be logged via an eform or customers services operator, to be assessed on the next working day. They will then be investigated once officers are available outside of business hours. There will be no reactive service to residents reporting noise.</p>	<p>Officer/s on duty intervening, when it is safe to do so, on all new reports and ongoing cases requiring further evidence;</p> <ul style="list-style-type: none"> • April to September 2 officers on duty • October to March 1 officer on duty <p>No service on Christmas Day, Boxing Day, and New Year's Day</p>	<p>Officers on duty intervening, when it is safe to do so, on all new reports and ongoing cases requiring further evidence. Utilising dynamic risk assessment and considering level of demand they may work as a pair or individually.</p> <p>No service on Christmas Day, Boxing Day and New Year's Day</p>
Operational Hours	<p>Monday-Friday 1800-0100 Saturday 1000-0100 Sunday 1000-0100 Bank Holidays 1000-0100 365 days per year; rolling 4-day shift pattern.</p>	As required on a case-by-case basis.	<p>Friday 1900-0200 Saturday 1900-0200 Sunday 1900-0200 Bank Holidays 1900-0200 (except CD/BD/NYD)</p> <p>Bank Holidays 1900-0200 (except CD/BD/NYD)</p>	<p>Friday 1900-0200 Saturday 1900-0200 Sunday 1900-0200 Bank Holidays 1900-0200 (except CD/BD/NYD)</p> <p>1.2 FTE Required split between 2 part time officers.</p>
Pros	<ul style="list-style-type: none"> • Little revenue cost to LBB as within MOPAC funding budget • Low administrative and management requirement • Peak hours of demand are covered • Service provided 7 days a week until 0100 • Evidence gathered on higher risk reports • Intervention, where safe to do so, for higher risk reports • Operates 365 days per year 	<ul style="list-style-type: none"> • Only paying for overtime when required for an ongoing case • Will be within the MOPAC funding budget • Less pressure on limited staff to meet this level of service. 	<ul style="list-style-type: none"> • Service focussed on peak demand in Spring & Summer • Safer and more companionable for staff in the late hours Apr-Sep • Intervention, where safe to do so & capacity allows, for all reports • One-off events/parties have greater chance being stopped • Rota has greater flexibility for staff to do single/multiple shifts • Higher payment to attract competent officers from across LBB • MOPAC funding fully utilised providing good value for LBB • Increased responsiveness during the weekends & BH 	<ul style="list-style-type: none"> • Service is met by officers contractually committed to these working hours • Safer and more companionable for staff in the late hours • Intervention, where safe to do so & capacity allows, for all reports • One-off events/parties have greater chance being stopped • Rota has greater flexibility for staff to do single/multiple shifts • Higher payment to attract competent officers from across LBB with set routine • MOPAC funding fully utilised providing good value for LBB • Increased responsiveness during the weekends & BH

Subject/Item	Option 1	Option 2	Option 3	Option 4
Description	Continue with current service	Close the service	Weekend Service Single Officer 50%/Two Officer 50%	Weekend Service Two Officers All Year – Permanent/Fixed Term Contract
	<ul style="list-style-type: none"> Staff can remain at home and only attend when called 		<ul style="list-style-type: none"> Expanded capacity to gather evidence for all noise reports Customer Care Centre/Duty Officer, can triage reports Increased capacity to witness/investigate all noise reports Peak hours of demand are covered 	<ul style="list-style-type: none"> Expanded capacity to gather evidence for all noise reports Customer Care Centre/Duty Officer, can triage reports Increased capacity to witness/investigate all noise reports Peak hours of demand are covered
Cons	<ul style="list-style-type: none"> Voluntary basis risks staff shortage and service insecurity Lone working hence limited level of intervention possible Reliant on non-qualified staff to filter reports for investigation New reports, from a single resident, are left to the next working day One-off events/parties are not witnessed or dealt with in real time No service from 0100-0900 Remuneration is not motivating staff to volunteer Limited/Unavailable Police support 	<ul style="list-style-type: none"> Voluntary basis risks staff shortage and service insecurity Lone working hence limited level of intervention possible New reports outside of business hours left to the next working day One-off events/parties are not witnessed or dealt with in real time No reactive service Increased complaints regarding lack of service Slower resolution to cases Expensive to re-instate if deemed required again Forfeit unspent MOPAC Grant monies as won't all be required Not efficient to complete overtime for a single case i.e., 1hr Limited/Unavailable Police support 	<ul style="list-style-type: none"> Voluntary basis risks staff shortage and service insecurity No service Monday to Thursday evenings & outside proposed hours Duty (not stand-by) requirement may discourage applicants Staff do not volunteer for rota for reasons other than financial Budget pressure as MOPAC grant insufficient Low demand hours, Mon-Thur, will not have a service inc alarms/construction 1 Team may not be adequate in the high demand summer months 1 (winter) and 2 (summer) staff require weekday working hours adjustment after Sunday/BH's Increased pressure on staff as they are fully working not on standby Increased workload to assess incoming caseload over weekend, allocate formally to officer and prioritise against the existing caseload. Increased workload as residents' awareness of service availability increases the number of calls Potentially poor staff morale and safety due to lone working at night in the Winter months Limited/Unavailable Police support 	<ul style="list-style-type: none"> No service Monday to Thursday evenings & outside proposed hours Duty (not stand-by) requirement may discourage applicants Budget pressure as MOPAC grant insufficient Low demand hours, Mon-Thur, will not have a service including alarms/construction 1 Team may not be adequate in the high demand summer months Increased pressure on staff as they are fully working not on standby Increased workload to assess incoming caseload over weekend, allocate formally to officer and prioritise against the existing caseload. Increased workload as residents' awareness of service availability increases the number of calls Potentially poor staff morale and safety due to lone working at night in the Winter months Limited/Unavailable Police support Currently hard to recruit into these posts across all local authorities. Service risk when staff take leave (annual/sick)

Public Protection Out of Hours Noise Service Options Appraisal			January 2023	
Subject/Item	Option 1	Option 2	Option 3	Option 4
Description	Continue with current service	Close the service	Weekend Service Single Officer 50%/Two Officer 50%	Weekend Service Two Officers All Year – Permanent/Fixed Term Contract
Cost	<p>Paid Per Day: Monday-Friday £40.00; Saturday £130.00; Sunday £130.00; Bank Holiday £180.00.</p> <p>Based on rolling standby 4-day rota an officer will earn between £160-£620 depending on what days their shifts fall on. There is no extra payment if the officers are called out.</p> <p>Standby Payment: £24,410 Event Noise & Vibration Management Payment: £5,590 MOPAC Grant: -£30,000 Budget Uplift Requirement £0</p>	<p>Budget reallocated to pay ad hoc overtime for specific cases requiring investigation outside of business hours.</p> <p>Estimated Cost: £20,000 to £30,000 MOPAC Grant: -£30,000 Budget Uplift Requirement £0</p>	<p>Team Manager & Administration Enhancement £15,328 Overtime Cost p/a £51,959 Event Noise & Vibration Management Budget £5,590 Total Cost £72,877 Budget Uplift requirement £42,877</p>	<p>Staff Salary Total p/a £74,490 Event Noise & Vibration Management Budget £5,590 Total Cost £80,080 Budget Uplift requirement £50,080</p>
Recommendation	Not recommended	Not Recommended	Not Recommended	Recommended

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Appendix 3 - Table 1 – Benchmarking of LBB's OOHNS

Authority	OOH noise service provision	Cost (£)	Demand
Barking & Dagenham	<p>OOH service is operational 7 days per week and over 4 nights (TFSS) and is part of the environmental enforcement function comprising of a team of 20 staff. OOH working is part of staff JDs, no call out or overtime paid. Staff contracts require that they work 7 nights and 6 days per week, with each officer undertaking 7 nights every month and 1 Saturday in 4. Officers are paid PO3 starting on SP32.</p> <p>Days – Mon to Fri 8am – 8pm, Sat 8am – 4pm. Nights – Sun & Thurs 8pm – 2am, Fri & Sat = 8pm – 4 am. Bank holiday days are not worked and BH nights are compensated with TOIL.</p>	Not known	Not known
Barnet	OOH noise service is 3 weekend nights (FSS) until 3 am with 2 officers. Friday starts after office hours, Saturday starts midday, and Sunday starts 10am with one officer. It is voluntary staffed mainly by in house staff at £20.50 per hour flat rate, 7.5 hour shift. No agency staff used currently.	Not known	Not known
Bexley	Do not operate out of hours services, other than receiving service requests via telephone and web.	0	Low
Bromley (current)	Lone officer on standby to respond to continuous premises alarms, reports regarding noise & nuisance cases on the officer referral list and construction noise Mon to Fri 18.00 – 01.00 Sat & Sun & BHs 10.00 – 01.00	0 – covered by MOPAC grant	Low
Camden	Currently outsource this service, and the roles are fulfilled by agency staff at £30 per hour. But are currently looking to bringing it in house.	Not known	Not known
Croydon	None	0	High
Dartford	None	0	Low
Enfield	<p>Has an OOH Noise Service 2 nights/week Fri and Sat 9pm - 3am. In the summer there are 2 teams on Saturday nights. Use internal staff with relevant experience at £30 p/h regardless of their grade. Its voluntary not in their contract. During the shift they also do other work tasks if not busy.</p> <p>It's a reactive service, not standby. Staff are paid 6 hrs x £30 plus they can claim 1hr of data inputting/scanning if the shift is busy. Don't currently use agency staff as with the extra costs it is around £40/hr.</p>	Not known	Not known

	OOHs staff work with a security driver – which is not recommend.		
Greenwich	Out of hours service Thursday and Friday nights and Saturday and Sunday day and night. Based on 8 agency officers working a shift pattern, the total cost is approx. £72k a year.	£72k	Medium
Harrow	No OOH noise service	Not known	Not known
Havering	No OOH noise service. Will do specific planned visits using overtime.	Not known	Not known
Hounslow	Have a responsive noise service that operates 7 days a week on the following hours: Monday – Thursday – 7am – 11pm. Friday – 7am – 2am (includes noise team). Saturday – 12pm – 2am (includes noise team). Sunday – 12pm – 11pm Use internal staff from their the neighbourhood enforcement service. The officers receive a 20% uplift on their basic salary for shift working and are thus contracted to take part, they work the above hours on a rota system.	Not known	Not known
Lambeth	Responsive noise service in working day with 3-day, very late night, response over weekends Mon to Fri 09.00 – 17.00 Thurs 20.00 – 04.00 Fri & Sat 21.00 – 05.00 Sun No service	No response – Assuming 2 teams of 2 agency officers £85 - £100k	Very High
Lewisham	None	0	High
Merton & Richmond	Use voluntary internal staff to provide service. Pay £250 per night (or £50/hr) <ul style="list-style-type: none">• LB Richmond Friday and Saturday nights all year round 10pm to 3am• LB Merton Friday nights (May to Aug) & Saturday nights all year round 11pm to 4am	Not known	Not known
Sevenoaks	Weekend service until midnight for large noise nuisance and referred cases only Fri & Sat 18.00 – 00.00hrs	£15,600	Low
Southwark	Responsive Noise Service, funded by HRA, working, in teams of 2, on shifts, running 24/7 through the weekend (1 team on Mon – Weds, 2 teams on Thurs and Sun, and 3 teams on Fri & Sat) Tues – Thurs 07.00 – 02.30 Fri – Mon – 24hr from 07.00 Fri to 02.30 Tues	>£220,000	Very high
Tandridge	None	0	Low

Agenda Item 10

Report No.
ES20246

London Borough of Bromley

PART ONE - PUBLIC

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

Date: Tuesday 31st January 2023

Decision Type: Non-Urgent Non-Executive

Non-Key

**Title: PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO
DRAFT BUDGET 2023/24**

Contact Officer: Murad Khan, Head of Finance - ECS
e-mail: Murad.Khan@bromley.gov.uk

Chief Officer: Director of Finance
Director of Environment & Public Protection

Ward: All

1. Reason for report

- 1.1. The prime purpose of this report is to consider the Portfolio Holder's Draft 2023/24 Budget which incorporates future cost pressures, any planned mitigation measures and savings from transformation and other budget options which were reported to Executive on 18th January 2023. Members are requested to consider the initial draft budget being proposed and also identify any further action that might be taken to reduce cost pressures facing the Council over the next four years.
 - 1.2. Executive are requesting that each PDS Committee consider the proposed initial draft budget savings and cost pressures for their Portfolio and the views of each PDS Committee be reported back to the next meeting of the Executive, prior to the Executive making recommendations to Council on 2023/24 Council Tax levels.
 - 1.3. There are still outstanding issues and areas of uncertainty remaining. Any further updates will be included in the 2023/24 Council Tax report to the next meeting of the Executive.

2. RECOMMENDATION(S)

2.1 The Public Protection and Enforcement Services PDS Committee is requested to:

- i) Consider the update on the financial forecast for 2023/25 to 2026/27;
 - ii) Consider the initial draft 2023/24 budget as a basis for setting the 2023/24 budget; and
 - iii) Provide comments on the initial draft 2023/24 budget for the February meeting of the Council's Executive.

Impact on Vulnerable Adults and Children

1. Summary of Impact: N/A
-

Corporate Policy

1. Policy Status: Existing Policy
 2. MBEB Priority: Managing Our Resources Well; A Safe, Clean and Green Environment and a Sustainable Future
-

Financial

1. Cost of proposal: Not Applicable
 2. Ongoing costs: Not Applicable
 3. Budget head/performance centre: Public Protection and Enforcement portfolio budgets
 4. Total current budget for this head: £4m (draft budget 2023/24)
 5. Source of funding: Draft revenue budget for 2023/24
-

Personnel

1. Number of staff (current and additional): Full details will be available with the Council's 2023/24 Financial Control Budget to be published in March 2023.
 2. If from existing staff resources, number of staff hours: Not Applicable
-

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 Local Government Act 2000; the Local Government Act 2002 and the Accounts and Audit Regulations 2015.
 2. Call-in: Not Applicable
-

Procurement

1. Summary of Procurement Implications: Not Applicable
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): The 2023/24 budget reflects the financial impact of the Council's strategies, service plans etc. which impact on all the Council's customers (including council taxpayers) and users of the services.
-

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. APPROACH TO BUDGETING, FINANCIAL CONTEXT AND ECONOMIC SITUATION WHICH CAN IMPACT ON PUBLIC FINANCES

- 3.1.1. The Draft 2023/24 Budget enables the Council to continue to deliver on its key priorities and the financial forecast enables medium term financial planning. Early decisions should be considered which impact on the medium-term financial plan within the context of meeting 'Making Bromley Even Better' priorities.
- 3.1.2. The Council continues to deliver key services and 'live within its means'. Forward financial planning and financial management is a key strength at Bromley. This report continues to forecast the financial prospects for the next four years and includes the outcome of the Provisional Local Government Finance Settlement 2023/24. It is important to note that some caution is required in considering any projections for 2024/25 to 2026/27 as this depends on the outcome of the Government's next Spending Review as well as the impact of the Fair Funding Review (likely to be from 2026/27).
- 3.1.3. A strong economy with growth increases revenues which supports the Government's ability to reduce public sector debt as the gap between finances raised and spend on public services is reduced. The slowing down of the global economy and many sources of uncertainty has previously resulted in a downgrading of the level of economic growth in the UK economy. It is important to consider the key national issues that could impact on public finances over the next four years. The Covid situation had a dramatic impact on public finances. Not since the second world war has a national emergency affected every business and household in the UK. The economic shock has had no comparisons for over 300 years. As part of the Office for Budget Responsibility report, published with the Autumn Statement, government overall debt is projected to represent 89.9% of Gross Domestic Product (GDP). This is expected to continue to increase and peak at 97.6% in 2026/27, maintaining a level not seen since the early 1960s. The next few years remain uncertain economically and fiscally, given that GDP is expected to fall in 2023/24 but deliver an overall increase of 2.6% per annum by 2026/27. These economic factors could impact on the funding available for local government. The Spending Review provided a one-year settlement which leaves considerable uncertainties over future years, with some limited assurances for 2024/25. However local government funding is currently expected to fall from 2025/26.
- 3.1.4. Local Government has borne the brunt of austerity and savings compared with other areas of Government expenditure from 2009/10 till 2019/20 (10 years) and had a 'rollover plus' one-year financial settlement for 2020/21, 2021/22 and 2022/23. For 2023/24 the Council has received a more generous settlement which includes additional funding for social care, including the repurpose of Adult Social Care Reform monies and a new Adult Social Care Grant. However, this needs to be considered in the context of the 'new normal' (post Covid), significant increases in inflation since 2022/23 and the considerable cost pressures across service areas facing local government. Austerity measures for future years, from 2025/26, will be a consideration but this will depend on the need for a sustainable economic recovery. It is currently predicted that it could take more than a decade to return UK public finances to full health. Therefore 'flat' real terms funding for councils may be the best-case scenario from 2025/26. The Government will need to address the impact of the public finances from the Covid situation. Although, the Government did give positive recognition of the need for funding for local government, as part of the 2023/24 Provisional Local Government Finance Settlement, funding may remain 'unprotected' and the impact of additional funding for NHS and other 'protected' services results could lead to future real term funding reductions remaining for local government. Even if funding levels are maintained the ongoing demographic and other costs pressures are unlikely to be matched by corresponding increases in government funding.

- 3.1.5. The Provisional Local Government Finance Settlement 2023/24 mainly provides funding proposals for one year only and the financial forecast assumes that various elements of the additional funding will continue in future years.
- 3.1.6. The Budget Strategy must be set within the context of ongoing cost and demographic pressures not being matched by Government or other external funding with potential Government funding reductions in the medium and longer term. There is an on-going need to transform the size and shape of the organisation to secure priority outcomes within the resources available. There is also a need to build in flexibility in identifying options to bridge the medium-term budget gap as the gap could increase further.
- 3.1.7. Bromley has the second lowest settlement funding per head of population in 2023/24 for the whole of London, giving us £118 per head of population compared with the average in London of £314 – the highest is £533. Despite this, Bromley has retained the third lowest council tax in outer London (other low grant funded authorities tend to have higher council tax levels). If the council tax was the average of the four other low grant funded boroughs, our income would increase by £30.2m. The lower council tax level has been achieved by having a below average cost per head of population in outer London. The Council continues to express concerns with the current and previous governments about the fairness of the funding system and to lobby for a fairer deal for our residents. Despite being a low-cost authority, Bromley has achieved general savings of over £120m since 2011/12 but it becomes more challenging to achieve further savings with a low-cost base.

3.2. SUMMARY OF FINANCIAL FORECAST

- 3.2.1. Details of the financial forecast are provided in the Draft 2023/24 Budget and Update on the Council's Financial Strategy 2024/25 to 2026/27 report to the Executive on 18th January 2022.
- 3.2.2. Even though the draft budget would be broadly balanced next year, the future year's budget gap is projected to increase to £29.6m per annum by 2026/27. Without any action to address the budget gap in future years additional reserves will need to be used with the risk of the budget gap increasing in future years and becoming unsustainable.
- 3.2.3. In the financial forecast, after allowing for inflation, council tax income and other changes there is an unfunded budget gap from 2026/27 partly due to net service growth/cost pressures. This highlights the importance of scrutinising growth and recognition that corresponding savings will need to be found to achieve a statutory balanced budget. It is timely as we all have to consider what level of growth the council can afford and the need for significant mitigation or alternative transformation options.

3.3. CHANGES SINCE THE 2020/21 BUDGET THAT IMPACT ON THE DRAFT 2023/24 BUDGET AND FINANCIAL FORECAST

- 3.3.1. The 2022/23 Council Tax report reported to Executive in February 2022 identified a significant "budget gap" over the four-year financial planning period. Some key changes are summarised below.
- 3.3.2. The Local Government Finance Settlement 2023/24, which covers 2023/24 continues to provide a significant improvement in funding for local government and combined with 2021/22 and 2022/23 represented the most positive funding proposal for local government since austerity began 12 years ago. The latest 2023/24 settlement provides a continuation of real increases in funding although this is retaining reliance on the utilisation of the ASC precept (2% increase) to support cost pressures in social care. It has also provided retention of One-Off Services Grant (reduced from £2.652m in 2022/23 to £1.494m in 2023/24, repurposed Adult

Social Care Reforms funding (£5.9m (net) in 2023/24 rising to £8.4m (net) per annum from 2024/25), additional funding towards social care costs (£3.9m in 2023/24 rising to £6.6m in 2024/25) and inflation cover for the Council's business rate share (£4.1m).

- 3.3.3. The additional funding is welcomed but this must be considered against the highest inflation levels for 41 years and ongoing cost/service pressures. Uncertainty remains on the level of funding beyond 2024/25. The forecast assumes that the level of core grant funding will not reduce from 2025/26.
- 3.3.4. Historically, the main measure of inflation for annual price increases for the Council's contracted out services was Retail Price Index (excluding mortgage interest rates) i.e., RPIX. However, more recent contracts use Consumer Price Index (CPI). The RPIX is normally at least 1% above the Consumer Price Index (CPI) level. The Draft 2023/24 Budget assumes contract price increases of 8.0%, in 2023/24 reducing to 4.0% in 2024/25 and 2% per annum from 2025/26, which compares with the existing CPI of 10.7% (13.9% for RPIX) - inflation is at its highest level for 41 years. The Bank of England reported that CPI inflation remains elevated at over 10% in the near term'. They also state that 'CPI inflation is expected to remain close to 11% through the remainder of Q4. It then eases towards 10% in 2023 Q1, before falling further in subsequent quarters. However the Monetary Policy Committee (MPC) views 'that the risks to the inflation projection are skewed to the upside'.
- 3.3.5. The Draft 2023/24 Budget and financial forecast includes significant growth/cost pressures, with the net impact reduced to reflect mitigation assumed of £14.1m in 2023/24 rising to £26.8m per annum from 2026/27. Any reduction in the delivery of the mitigation savings could have a significant detrimental impact on the Council's budget gap and the contingency sum provides some funding support towards delivering a balanced budget in the medium term. Given the scale of savings identified and any inherent risks, the need for longer term financial planning, the uncertainty on future year cost pressures, significant changes that may follow relating to future new burdens, effect of ongoing population changes and the potential impact of other public agencies identifying savings or new cost burdens which impact on the Council's costs it is essential to retain an adequate sum to partly mitigate such cost risks. The uncertainty of future arrangements for Adult Social Care reforms adds to that risk. If the monies remaining are not required during the year the policy of using these resources, in general, for investment, generate income/savings and provide a more sustainable financial position should continue.
- 3.3.6. With a remaining uncertainty on Government funding available in the future and the ongoing requirement for local authorities to be more self-sufficient, there is a need to consider what significant changes are required to manage within this new environment. The required changes relate to opportunities for partnership working, collaboration, reviewing the approach to managing risks, using technology to enable transformation of our services, helping people help themselves (friends' groups) and exploring opportunities around community-based place shaping led by the Council as a community leader. Even with the additional income identified in this report the Council will need to plan for significant changes including the impact of a recession and the 'new normal'. As pressures in statutory services such as adult social care, children's social care and high needs as well as homelessness are growing, the scope to invest in local priorities and services that benefit the widest range of people is reducing. The Council has delivered savings of over £120m per annum since 2009/10 and the ability to make savings in lower priority areas becomes more problematic. The need for savings in areas that support the Council's key priorities becomes more critical to meet the legal requirements for a balanced budget. The Council will continue to look for ways to operate more efficiently and generate more income, but this alone will not be enough to meet the future years' budget gap. The key consideration is how the Council can balance the budget over the next four years. Considering the core statutory minimum service requirements, Chief Officers continue to undertake the transformational review across all services, focusing on

higher spend services first with options being presented to future meetings. The ongoing transformation review will be a key consideration in addressing the budget gap over the next four years.

- 3.3.7. The Public Protection and Enforcement Services Portfolio budget did not previously have any transformation savings included in its budget position, however from 2023/24 there is £4k in Transformation Savings per annum.
- 3.3.8. This key work continues, and further proposals will be reported to Members in the future as part of addressing the four-year financial forecast and meeting the ‘budget gap’ whilst ensuring key priorities are met.
- 3.3.9. There remain significant cost/growth pressures for the Council as well as opportunities for the mitigation of costs. The impact on the Public Protection and Enforcement portfolio is summarised below with more details in Appendix 1.

	2023/24 £'000	2024/25 £'000	2025/26 £'000	2026/27 £'000
Growth – Coroners & Mortuary	300	300	300	300
Transformation Savings	Cr 4	Cr 4	Cr 4	Cr 4
Net Growth	296	296	296	296

- 3.3.10. It remains essential that there is the ongoing scrutiny and review of growth/cost pressures, which are mainly unfunded beyond 2024/25 with options to help achieve a balanced budget, including any mitigation over the financial forecast period.

3.4. DETAILED DRAFT 2023/24 BUDGET

- 3.4.1 Detailed draft 2023/24 Budgets are attached in Appendix 1 and will form the basis for the overall final Portfolio/Departmental budgets after any further adjustments to deal with service pressures and any other additional spending. Under the budget process previously agreed, these initial detailed budgets have been forwarded to PDS committees for scrutiny and comment prior to the next Executive meeting in February.
- 3.4.2 Appendix 1 sets out:
 - A summary of the Draft 2023/24 Revenue Budget for the Portfolio showing actual 2022/23 expenditure, 2022/23 budget, 2023/24 budget and overall variations in planned spending between 2022/23 and 2023/24.
 - A summary of the main reasons for variations per Portfolio in planned spending between 2022/23 and 2023/24 together with supporting notes.
 - A high-level subjective summary for the Portfolio showing expenditure on employees, premises etc.

3.5 REVIEW OF FEES AND CHARGES

- 3.5.1 There will need to be an ongoing review identifying opportunities as the medium term ‘budget gap’ remains significant. The 2023/24 Budget includes significant additional income from the review of fees and charges and Chief Officers will continue to review fees and charges for 2024/25 and beyond to identify opportunities to reduce the future years ‘budget gap’.

3.6 IDENTIFYING FURTHER SAVINGS/MITIGATION

- 3.6.1 The scale of savings required in future years cannot be met by efficiency alone – there may need to be a reduction in the scope and level of services. The council will need to continue to

review its core priorities and how it works with partners and key stakeholders and the overall provision of services. A significant challenge is to consider discretionary services which, if reduced, could result in higher cost statutory obligations. Therefore, it is important to consider the risk of ‘unintended consequence’ of reducing discretionary services adversely impacting on the cost of statutory services. The Draft 2023/24 Budget represents the fourth year of savings from the Transformation Programme. This key work continues, and further proposals will be reported to Members as part of addressing the four- year financial forecast and meeting the ‘budget gap’ whilst ensuring key priorities are met.

3.7 POSITION BY DEPARTMENT – KEY ISSUES/RISKS

- 3.7.1 There remain risks in meeting the ‘budget gap’ arising from budget savings, mitigation options to address cost pressures, as well as ongoing cost pressures arising from new burdens, implications of the post Covid situation and the impact of Government policy changes. Action will need to be taken to contain, where possible these cost pressures, managing the implementation of savings, generate income or seeking alternative savings where required. The Council’s Corporate Risk Register shows that ‘Failure to deliver a sustainable financial strategy which meets with Making Bromley Even Better priorities and failure of individual departments to meet budget’ is the highest risk the Council is facing.
- 3.7.2 In addition to the issues shown above, a further list of the potential risks which will be faced in future years that Members should consider arising from the assumptions made are detailed below. The level of balances held, and provisions set aside in the central contingency provide significant safeguards against any adverse financial pressures.

Mortuary & Coroners Service

- 3.7.3 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. Options are currently being explored with a view to securing longer term mortuary provision with the PRU which may provide an opportunity to stabilise costs going forward.
- 3.7.4 Any high-profile inquests or significant increase in volume of cases could increase the cost of the coroner’s service. The coroner is currently advocating the establishment of a second court with additional staff. However, we believe that currently there is no compelling argument to justify the need for a second court, be it temporary or permanent and that the service operated adequately before Covid.
- 3.7.5 There may also be an argument that given that Covid has unfortunately accelerated the deaths of many people in the latter years of their life, we may indeed see a decline in death rates and subsequent need for PM’s and inquests which would allow the opportunity for the Coroners Service to work through the backlog of cases.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 The Draft 2023/24 Budget reflects the Council’s key priorities which includes, for example, supporting vulnerable adults with children and being ambitious for all our children and young people.

5. POLICY IMPLICATIONS

- 5.1 The Draft 2023/24 Budget enables the Council to continue to deliver on its ‘Making Bromley Even Better’ key priorities and the financial forecast enables medium term financial planning

allowing for early decisions to be made which impact on the medium-term financial plan. The Council continues to deliver key services and lives within its means.

6. FINANCIAL IMPLICATIONS

6.1 Financial implications are contained within the overall body of the report.

7. PERSONNEL IMPLICATIONS

7.1 Staff, departmental and trade union representatives will be consulted individually and collectively on any adverse staffing implications arising from the Draft 2023/24 Budget. Managers have also been asked to encourage and facilitate staff involvement in budget and service planning.

8. LEGAL IMPLICATIONS

8.1 The adoption of the budget and the setting of the council tax are matters reserved for the Council upon recommendation from the Executive. In coming to decisions in relation to the revenue budget (and the Council Tax), the Council and its officers have various statutory duties. In general terms, the Council is required by the Local Government Finance Act 1992 to make estimates of gross Revenue expenditure and anticipated income, leading to a calculation of a budget requirement and the setting of an overall budget (and Council Tax). The amount of the budget requirement must be sufficient to meet the Council's legal and financial obligations, ensure the proper discharge of its statutory duties, and lead to a balanced budget.

8.2 Schedule 72 to the Localism Act 2011 inserted a new section IVZA in the Local Government Finance 1992 Act which sets out the duty on billing authorities, and precepting authorities to each determine whether their relevant basic amount of council tax for a financial year is excessive. If an authority's relevant basic amount of council tax is excessive, the provisions in relation to the duty to hold a referendum will apply

8.3 The making of these budget decisions at full Council is a statutory responsibility for all Members. The Council should be satisfied that the proposals put forward are a reasonably prudent use of resources in both the short and long term, and that the interests of both Council Taxpayers and ratepayers on the one hand and the users of Council services on the other are both considered. The Council has several statutory duties which it must fulfil by law. Although there can be an element of discretion on level of service provision. The Council also discharges a range of discretionary services. The Council is not bound to carry out such activities in the same way as it is for statutory duties, however, it may be bound contractually to do so. A decision to cease or reduce provision of a discretionary service must be taken in accordance with sound public /administrative law decision making principles. The Council must also comply with the Public Sector Equality Duties in section 149 of the Equality Act 2010. In doing so, the Council must have due regard to elimination of discrimination, harassment and victimisation, advance equality of opportunity and foster good relations with persons who share a protected characteristic.

8.4 This report sets the budget for the forthcoming financial year and, in some cases where budgets are recommended to be reduced, further decisions may be required (or have already been taken) to implement the initiative achieving the budget reduction. These decisions will be subject to any applicable consultation requirements and analysis of equalities impacts together with consideration of other specific legal requirements. This will be undertaken as part the decision-making process as required to implement the proposed budget.

- 8.5 Further a significant number of these decisions are by law for the Executive or delegated officers. Such considerations, which will be fully assessed by the decision makers in due course, are therefore not set out in this report. It therefore follows that the outcome of these decisions may lead to further amendments and/or changes to the proposed savings. Members will be aware that decisions on the budget do not amount to detailed decisions on the precise delivery of services, those decisions, in any event, for most services, being by law a matter for the Executive. Decision makers (usually Executive, Portfolio Holders or Chief Officers) are aware and will be reminded of their flexibility for example, around possible budget virements and adjustments and the use of reserves when they consider it appropriate to make alternative decisions, which may not accord with a particular budget line. The overall requirement to balance the budget remains, however.
- 8.6 The Local Government Act 2003 included new requirements to be followed by local authorities, which includes the CIPFA Prudential Code. This includes obligations, which includes ensuring adequacy of future years reserves in making budget decisions and section 25 of that Act requires the Director of Finance to report on the robustness of the estimates made for the purposes of calculating the Council Tax and the adequacy of the reserves. Further details to support these obligations will be reflected in the 2023/24 Council Tax report to be reported to the February meeting of the Executive

Non-Applicable Sections:	Procurement Implications
Background Documents: (Access via Contact Officer)	Draft 2023/24 Budget and Update on the Council's Financial Strategy 2024/25 to 2026/27, Executive 18 th January 2023.

PPE PORTFOLIO
DRAFT REVENUE BUDGET 2023/24 - SUMMARY

2021/22 Actual	Service Area	2022/23 Budget	Increased costs	Other Changes	2023/24 Draft Budget
£		£	£	£	£
371,000	Public Protection and Enforcement	426,340	46,380	57,660	530,380
548,000	Community Safety	603,230	36,190	300,000	939,420
1,466,000	Mortuary & Coroners Service	1,468,970	138,170	(50,000)	1,557,140
2,385,000	Public Protection				
161,000	Emergency Pnanning	146,220	8,770	0	154,990
2,546,000	Emergency Planning	2,644,760	229,510	307,660	3,181,930
617,000	TOTAL CONTROLLABLE	6,130	370	5,320	11,820
836,000	TOTAL NON CONTROLLABLE	811,110	0	4,990	816,100
3,999,000	TOTAL EXCLUDED RECHARGES	3,462,000	229,880	317,970	4,009,850
	PORTFOLIO TOTAL				

PPE Portfolio**SUMMARY OF BUDGET VARIATIONS 2023/24**

Ref		VARIATION IN 2023/24		ORIGINAL BUDGET 2022/23 £'000
		£'000	£'000	
1	2022/23 BUDGET			3,462
2	Increased Costs			230
	Full Year Effect of Allocation of Central Contingency			
3	National Insurance - cut in employer contribution rate	Cr	19	
4	Agency contract savings	Cr	8	Cr 27
	Movements Between Portfolios/Departments			
5	VAWG Team from Children's Services			64 0
	Real Changes			
6	IDOX Software Licensing		Cr 20	118
	<i>Growth</i>			
7	Mortuary and Coroners Service			300 603
	<i>Transformation Programme Savings</i>			
8	Share of Transformation Savings for PPE		Cr 4 Cr 5	
9	Variations in Recharges		5	7
10	2023/24 DRAFT BUDGET			4,010

PPE**Notes on Budget Variations in 2023/24****Ref Comments****2 Increased Costs (Dr 230k)**

Inflation has been allocated to budgets for 2023/24. A rate of 6% has been applied to pay and non-pay budgets.

Full Year Effect of Allocation of Central Contingency**3 National Insurance - cut in employer contribution rate (Cr £19k)**

The adjustment for the 1.25% National Insurance contributions increase included in the 2022/23 budget has been reversed, following the Government's announcement in September 2022.

4 Agency contract savings (Cr £8k)

The full year effect of agency worker savings expected as a result of the most recent contract award

Movements Between Portfolios/Departments**5 VAWG Team from Children's Services - (Dr £64k)**

The Violence Against Women and Girls team has moved from Children's Services to Public Protection and Enforcement (Community Safety) where the MOPAC grant is also coded, increase to PPE of £64k

Real Changes*Other***6 IDOX Software Licensing £20k increase in budget due to new contract***Growth***7 The Mortuary and Coroners Service has received a total growth of £300k due to known pressures in the area this is a joint contract Croydon Council.***Transformation Programme Changes***8 Fees and charges review- £Cr 4k**

Share of transformation saving of £600k for PPE, this has been added as an increase to fees and charges income.

9 Variations in Insurance (Dr £5k)

Insurance recharges to individual portfolios have changed between years, in some cases significantly, partly due to the changing profile of actual claims in the recent past. Inflation has also had an impact, both on the projected policy costs, and the costs of delivering the service.

PPE PORTFOLIO
DRAFT REVENUE BUDGET 2023/24 - SUBJECTIVE SUMMARY

Service area	Employees	Premises	Transport	Supplies and Services	Third Party Payments	Transfer Payments	Government Grants	Other Grants Reimbursements and Contributions	Customer and Client Receipts	Controllable Recharges	Below Cost of Services on CIES	Movement between Reserves	Total Controllable
	£	£	£	£	£	£	£	£	£	£			£
Public Protection and Enforcement													
Emergency Planning	141,830		4,850	8,310	0					0			154,990
Community Safety	544,270		5,360	274,750	103,270		-367,140		0	-30,130			530,380
Mortuary & Coroners Service	0		0	0	939,420				0	0			939,420
Public Protection	2,115,860	43,490	32,130	161,590	504,250				-440,390	-859,790			1,557,140
	2,801,960	43,490	42,340	444,650	1,546,940	0	-367,140	0	-440,390	-889,920	0	0	3,181,930
	2,801,960	43,490	42,340	444,650	1,546,940	0	-367,140	0	-440,390	-889,920	0	0	3,181,930

Service area	Capital Charges/Financing	Repairs, Maintenance & Insurance	Rents and Other Property Based Charges	Not Directly Controllable	Net Recharges	Total Net Budget
	£	£	£	£	£	£
Public Protection and Enforcement						
Emergency Planning	0	30		30	74,810	229,830
Community Safety	0	340		340	818,630	1,349,350
Mortuary & Coroners Service	0	0		0	82,060	1,021,480
Public Protection	0	11,450		11,450	-159,400	1,409,190
	0	11,820	0	11,820	816,100	4,009,850
	0	11,820	0	11,820	816,100	4,009,850

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Agenda Item 11

Report No.
ES20252

London Borough of Bromley
PART ONE - PUBLIC

Decision Maker:	PUBLIC PROTECTION AND ENFORCEMENT POLICY DEVELOPMENT & SCRUTINY COMMITTEE		
Date:	Tuesday 31 January 2023		
Decision Type:	Non-Urgent	Non-Executive	Non-Key
Title:	HOUSES OF MULTIPLE OCCUPATION - MEMBER UPDATE		
Contact Officer:	Charlotte Hennessy, Environmental Protection & Housing Enforcement Manager Email: charlotte.hennessy@bromley.gov.uk John Stephenson, Head of Planning and Development Support. Email: john.stephenson@bromley.gov.uk		
Chief Officer:	Director of Environment and Public Protection		
Ward:	(All Wards);		

1. Reason for decision/report and options

- 1.1 The prime purpose of this report is to update the Committee on the current status of the regulation of houses of multiple occupation (HMOs) within the borough.

2. RECOMMENDATION(S)

2.1 Note the content of the report.

Impact on Vulnerable Adults and Children

1. Summary of Impact
 - 1.1 Ensuring minimum safety and amenity standards are met in the HMOs that require mandatory licensing in the private rented sector leading to better quality rented accommodation for all Bromley residents living in this sector.
 - 1.2 Ensuring minimum development standards are applied through the planning application process protecting all Bromley residents living in this sector.
-

Transformation Policy

1. Policy Status: Not Applicable
 2. Making Bromley Even Better Priority
 - (1) For children and young people to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.
 - (2) For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.
 - (3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
 - (4) For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future.
-

Financial

1. Cost of proposal: Not Applicable
 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: Service Revenue Budgets
-

Personnel

1. Number of staff (current and additional):
4.0 FTE for all Housing Enforcement functions, Public Protection
4.5 FTE for Planning Enforcement, Development Control
 2. If from existing staff resources, number of staff hours: Not Applicable
-

Legal

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

Procurement

1. Summary of Procurement Implications: Not Applicable

Property

1. Summary of Property Implications: Not Applicable

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications:

Where an HMO is required in law to have a current Energy Performance Certificate (i.e., no older than 10 years) the property must meet a minimum standard of an E and the licence holder or manager must present this to the tenant.

Customer Impact

1. Estimated number of users or customers (current and projected):

Estimate is between 1,800 and 2,200 residents currently living in HMOs that require a mandatory license. Many more live in HMOs that do not currently require a mandatory license.

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 Background

3.1.1 The Law

- 3.1.2 The term “house in multiple occupation” (HMO) is defined in Section 254 of the Housing Act 2004 as “a property occupied by 3 or more unrelated people in 2 or more households”. Its definition covers bedsits, studio flats, shared houses, hostels, and refuges. There are two types of licensing for HMO’s as below.

Mandatory HMO Licence (MHMO)	<p>This type of licence is for 5 years and applied nationally. It is required if it is:</p> <ul style="list-style-type: none">• Occupied by 5 or more tenants, 4 or more if there is a live-in landlord, in 2 or more households (a household can be an individual, couple or family).• There is at least 1 kitchen, bathroom or toilet shared by the tenants. <p>There are various organisations which are exempt when they manage or control an HMO i.e. public sector bodies, educational establishments and religious organisations.</p>
Additional HMO Licence	<p>This type of licence is discretionary for local authorities to adopt. If adopted, it applies to any property occupied by three or more individuals, not from the same family, that is not captured by MHMO licensing.</p> <p>Currently this has not been adopted within the London Borough of Bromley.</p>

- 3.1.3 The Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018 introduced a new definition for licensable HMOs, removing the previous requirement for the property to be 3 storeys. This change led to an increase in the number of properties requiring a licence.
- 3.1.4 Prior to September 2022 the deregulation of planning control, by the Government, meant that many smaller HMOs could be developed under permitted development rights and therefore did not require planning permission. Since the whole Borough Article 4 Direction was approved on 1st September 2022 removing permitted development rights for properties to change to HMOs, they now require planning permission under the Town & Country Planning Act. This enables proposed HMOs to be assessed with regard to planning policies prior to their development. It should be noted however that planning policies may support the granting of permission even where there are local objections and at this time there are no specific local policies relating to HMOs.
- 3.1.5 Planning permission is now required in Bromley for a property to become an HMO. This is an addition for those properties that require a licence under the mandatory HMO criteria. The planning process ensures cross boundary issues such as parking stress and detrimental impacts on amenity are addressed. Building Control approval is also required, however that may be via a third party Approved Inspector rather than the Council's Building Control. The HMO Licensing process ensures that the Borough's safety and amenity standards are met, and that the properties meet the mandatory standards for their state of repair as prescribed by the Housing Acts.

- 3.1.6 There are controls on construction impacts which can be enforced by Public Protection under the Control of Pollution Act 1974 and the Environmental Protection Act 1990. There are behaviour controls under anti-social behaviour legislation, as enforced by the Police, that apply to all residents in the borough.
- 3.1.7 Tenancy conditions can be enforced by the property owners/managing agents under civil and property law, and there are some controls on adequate waste storage capacity under the Licence Holders management responsibilities that can be enforced by Housing Enforcement. Wider issues relating to waste may be enforceable by the Public Protection Nuisance Team and/or Neighbourhood Management.

3.2 The Local Situation in Bromley

- 3.2.1 There is an increasing in demand for HMOs in LB Bromley prior to September 2022. As a result, a significant number of semi-detached properties, predominantly in Orpington and Biggin Hill, were purchased by developers to be extended and converted into HMOs. Investigations suggest that there were 2 organisations actively working to acquire HMO accommodation in Bromley, Clear Springs Ready Homes, working predominantly for the Home Office, and Steph & Philips, a private sector company well established in the emergency nightly paid and the private rented accommodation markets. As previously stated, anecdotally, the pace of conversion has slowed post September 2022.

3.3 Mandatory HMO Licensing in Bromley

- 3.3.1 There are currently 234 licenced HMOs in Bromley, with a further 150 applications submitted awaiting assessment and processing, 8 of those are applications to renew an HMO licence. This brings the total number of licenced HMOs in Bromley to 358 at the time of preparing this report.
- 3.3.2 HMOs found without an appropriate license are encouraged to make an application as a first step. If there is a refusal to attain a license, a landlord can be prosecuted for operating a HMO without a licence. There has been 1 successful prosecution in the courts for operating an HMO without a license since September 2022.
- 3.3.3 LBB recently improved the space and amenity standards for HMOs to ensure a better quality of accommodation for residents who live in HMOs. This has resulted in some HMO developers now only fitting 5 units into each HMO property rather than the previous 6.

3.4 HMO Licensing Income

- 3.4.1 As can be seen in Table 1 below there was a dramatic rise in HMO Licensing income in 2018. This was due to the number of HMOs requiring licensing under the Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018 increasing due to the change to the legal definition of a mandatory HMO.
- 3.4.2 It must be noted that an HMO license is granted for 5 years before the owner has to then re-apply. There is an application fee and a licence fee which is apportioned out over the 5 years, so the income totals also ebb and flow in accordance with this 5-year cycle. The demand for smaller and cheaper accommodation, such as that provided for by HMOs, is also impacted by demand in the housing market and societal trends such as the rise in single person households.
- 3.4.3 There was a marked increase in income in 2020 – 2021 and in each subsequent year. It is anticipated that the pace of development, and thus pace of increase in receipts, will now slow, due to the need for planning permission before conversion, but this will not be seen until next year's figures become available.

3.4.4 Table 1 – Annual income from HMO License receipts from 2012

Year	Income (£)
2012 - 2013	3,105
2013 - 2014	8,795
2014 - 2015	4,025
2015 - 2016	1,475
2016 - 2017	4,875
2017 - 2018	13,775
2018 - 2019	17,780
2019 - 2020	18,340
2020 - 2021	64,509
2021 - 2022	119,085
2022 – 2023 (up to 18/12/2022)	208,922

3.5 Tenure Intelligence

- 3.5.1 In 2021 a tenure intelligence exercise was undertaken to identify if there were any potential HMOs in Bromley that required a mandatory licence that had not applied. A data warehouse was created using open-source data and other data sets including the property gazetteer, council tax, housing benefit, electoral roll, parking permit processing, properties where enforcement notices had been previously served, and the tenancy deposit scheme.
- 3.5.2 Analysis of the above data gave each property a score for the likelihood of it being a HMO between 0 and 1, with 1 being the highest confidence level and 0 the lowest. On review of the data, properties could be eliminated based on officer knowledge and from cross referencing with Public Protection records. Properties that are currently exempt from mandatory HMO Licensing were then excluded. It was found that a significant number of properties had been flagged due to them having a large floor area or footprint, however, this feature is not uncommon in Bromley and these properties were indeed found to be large single-family homes.
- 3.5.3 The Algorithm used was designed to pick up the characteristics of an HMO, however, in doing so it failed to consider the following:
- Properties with multiple surnames on council tax records – whilst these can be attributed to HMOs, they can also occur because of co-habitation, blended, multi-generational and extended family groups living at the same address.

- Properties with large floor areas – these were identified, however consideration was not given to high value properties in single family occupation. Most of the properties identified fell into this category with several streets of high value homes being included in the results.
- Properties that had been previously served with enforcement notices – the algorithm did not consider the type of notice served. Some properties had been served with a S16 Local Government (Miscellaneous Provisions) Act 1972 notice which is a ‘Request for Information’ regarding property ownership and occupation, or had received a Food Safety or Health & Safety enforcement notice. None of these notices increase the likelihood of there being an HMO at that location.

3.5.4 Following the ‘weeding out’ process 20 properties remained identified as potential HMOs. These properties were visited by officers to determine their residential status of the property and follow up letters were posted.

3.5.5 The Tenure Intelligence Exercise led to no additional properties being identified as HMOs requiring mandatory licensing. However, the exercise did add value as a ‘due diligence’ exercise and illustrated that the property owners and managing agents of HMOs in Bromley are largely compliant with HMO licencing requirements.

3.6 Planning Activity and HMOs

3.6.1 Since 1st December 2019 the Planning Service has received:

- 24 applications for Lawful Development Certificates (LDCs) using permitted development rights.
- 27 planning applications to become an HMO.

The majority of these have been received in the last six months in the lead up to, and since, the implementation of the Article 4 Direction. Of these:

- 7 LDCs have been granted and 17 are pending a decision.
- 13 planning applications to become an HMO have been permitted, 8 refused, and 6 remain pending.

3.6.2 25 HMO planning enforcement complaints have been received since 1st September 2022 of which:

- 7 have been investigated and closed.
- 7 remain pending.
- 1 enforcement notice has been issued, as the Planning Service only move to prosecution if there is non-compliance with the enforcement notice.

4 IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 HMOs tend to accommodate many lower income households, vulnerable adults, and families with children. Traditionally, the most disenfranchised sectors of the community are accommodated within this sector. However, this type of accommodation also houses young professionals, and many other groups including single person households.

5 TRANSFORMATION/POLICY IMPLICATIONS

Not Applicable

6 FINANCIAL IMPLICATIONS

Not Applicable

7 PERSONNEL IMPLICATIONS

No personnel implications.

8 LEGAL IMPLICATIONS

It is a legal requirement to gain planning permission for an HMO and then appropriately licence any HMO that meets the mandatory HMO licencing criteria under the Housing Act 2004.

9 PROCUREMENT IMPLICATIONS

Not Applicable

10 PROPERTY IMPLICATIONS

Not Applicable

11 CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

Where an HMO is required in law to have a current EPC (i.e., no older than 10 years) the property must meet a minimum standard of an E and the licence holder or manager must present this to the tenant.

12 CUSTOMER IMPACT

Ensuring minimum safety and amenity standards are met in the HMOs that require mandatory licensing housing in the private rented sector leads to better quality rented accommodation for all Bromley residents living in this sector.

Ensuring minimum development standards are applied through the planning application process also protects all Bromley residents living in this sector.

13 WARD COUNCILLOR VIEWS

N/a

Non-Applicable Headings:	5, 6, 9, 10 & 13
Background Documents: (Access via Contact Officer)	London Borough of Bromley - Adopted Housing Standards 2021

Agenda Item 12

SAFER BROMLEY PARTNERSHIP BOARD

Minutes of the meeting held at 10.30 am on 12 January 2023

Present:

Louise Watkinson ((LBB Assistant Director for Public Protection & Enforcement)) (Chairman)
Ken Loyal ((MET Police)) (Vice-Chairman)

Stuart Baker, (MET Police)
Sharon Baldwin, (Safer Neighbourhood Board Chairman)
Sandra Campbell, (LBB ASB Project Officer)
Lynnette Chamielec, (LBB Assistant Director-Housing)
Emily Duignan, (Service Manager: Bromley Drug and Alcohol Service)
Chris Line, (LFB: Borough Commander)
Sarah Newman, (LBB Head of Service for Community Safety, Environmental & Domestic Regulation)
Anthony Powell, (LBB Public Protection and Enforcement)
Paul Sibun, (Adult Safeguarding Manager SEL ICB (Bromley))
Lucien Spencer, (National Probation Service)
Gordon Falconer, (LBB Interim Community Safety Manager)
Louise Shafi, (LBB Public Protection and Environmental Services)

Also Present:

Councillor Alison Stammers
Councillor Ruth McGregor
Councillor Simon Jeal
Councillor David Cartwright QFSM

48	WELCOME/HOUSE-KEEPING/INTRODUCTIONS, APOLOGIES AND DECLARATION OF INTEREST	Action
	Apologies for absence when received from the BCU Commander Andy Brittan, David Dare, Chan Farooqui Dina Shamonivoc, Richard Baldwin, Cllr Angela Page, Dawn Helps, Finola O Driscoll, Betty McDonald and Rob Vale. There were no declarations of interest.	
49	MINUTES OF THE SAFER BROMLEY PARTNERSHIP MEETING-- 27th OCTOBER 2022	Action
	The Minutes of the Safer Bromley Partnership Board that sat on the 27th of October 2022 were agreed and signed as a correct record.	
50	MATTERS ARISING FROM THE PREVIOUS MEETING	Action

	<p>Partners noted the matters arising from the previous meeting and noted that the actions had been implemented. It was noted that the Violence and Vulnerability Action Plan needed further work before completion and dissemination.</p> <p>RESOLVED that the Matters Arising report be noted.</p>	
51	<p>QUESTIONS RECEIVED FROM COUNCILLORS OR MEMBERS OF THE PUBLIC</p> <p>A question was received from Councillor Simon Jeal.</p> <p>He asked that with reference to the update on Priority 2 of the Safer Bromley Strategy (Violence Against Women and Girls), could the Chairman confirm whether sex workers were included within the scope of 'High Risk Victims' under the Strategy and if so, what specific actions were being undertaken by the Council, commissioned providers and partners, to address barriers preventing those who were victims of violence being able to access VAWG support services provided under the Strategy.</p> <p>The Chairman responded and stated that sex workers were indeed included in the Priority 2 element of the Strategy. The multi-agency approach was designed to deal with a wide range of crime and disorder across the borough, including the area that had been identified in the question. It was noted that the Council had a Domestic Abuse Strategic Lead, based in the Community Safety Team of the Public Protection Division. This post worked across a broad range of partners, agencies and organisations to support existing services and to develop new ones where required. A key element of the post's work was to ensure that there were not barriers that prevented victims of violence & abuse to access appropriate services and where required, to work with partners in the borough to develop new ones.</p> <p>The following organisations and services providing assistance and support to victims and survivors in the borough were noted.</p> <ul style="list-style-type: none">• There was a local Bromley Procedure for modern slavery & human trafficking: <u>procedure_26_modern_slavery_and_human_trafficking_policy_and_guidance.pdf (bromleysafeguardingadults.org)</u>• The Bromley Safeguarding Adults Board (BSAB) was a member of the London Modern Slavery Leads (LMSL) group, facilitated by the Human Trafficking Foundation.• WGN (Women and Girls Network) - LBB part funded their hotline; they offered various services, including an advice line, a dedicated sexual violence helpline and counselling sessions.	Action

	<ul style="list-style-type: none"> • Nia – an organisation in receipt of national funding and who provided a service in Bromley to deliver 1-1 outreach and professional training and support services for vulnerable women affected by sexual and domestic violence <u>Specialist Refuge Strand Leaflet-2017-2023.pdf</u> • Bromley & Croydon Women's Aid (BCWA) – the Council's commissioned service, providing support to victims & survivors in all the areas of domestic abuse • WIP (Women in Prison) - national funding for work to be done in Bromley on sexual violence/abuse • Victim Support - Supporting victims of sexual violence, slavery and trafficking. • Early Intervention & Family Service (EIFS) - providing support to EU nationals and those with no recourse to public funding (NRPF) • LBB website was multi-language • Brighter Beginnings, a local charity, providing financial and practical support to vulnerable victims <p>Councillor Jeal and the Chairman of the Safer Neighbourhood Board said that recent comments from Cllr Sean Slater were damaging to the Strategy. The Chairman of the SNB said that she was surprised that a statement had not been released by the Council. She said that a counter education campaign was needed in schools to counter misogynistic messages from people like Andrew Tate.</p> <p>RESOLVED that the question and the response to the question be noted.</p>	
52	<p>CRIME PERFORMANCE DASHBOARD: JANUARY 2023 UPDATE</p> <p>Councillor David Cartwright commented that he could not read the size of the print and that the document should be provided on A3 in the future. He said that the document should be 'RAG RATED' with appropriate lettering used to aid anyone who was colour blind. It was noted that the MOPAC website was no longer producing the data which now had to be sourced from the MET website. The data was the same, but the presentation of the data was different. There was no published pack containing the data for ease of access.</p> <p>It was noted that the only area of crime that had decreased was burglary, most other areas had increased. This included sexual</p>	Action

<p>offences and domestic violence offences which were up nationally as were vehicle crimes. This may be the result of more confidence with respect to reporting.</p> <p>The Board was informed that the Police Commissioner was intending to introduce new policing priorities as part of a revised policing framework; there would be a movement towards dealing with acquisitive crime as well as violent crime and more proactive policing and targeting of offenders. It was acknowledged that too many abstractions had taken place previously which meant the Neighbourhood Officers were not able to carry out their day-to-day activities as well as they would have liked. Plans were in place to address this. Recruitment would be undertaken for more Neighbourhood Officers to replace any that had moved to Response Teams. The focus of the police would be on local and national priorities as well as Ward Panels.</p> <p>It was noted that the police had forwarded a public attitude survey the day prior to the meeting and that this document would be disseminated with the minutes. The Chairman said that she was looking to draft a standard template going forward so that the police data could be provided in a uniform format. It was felt that when data was provided it should meet the following criteria:</p> <ul style="list-style-type: none">• Cover specific topics/areas• The data provided should serve a useful purpose.• The data should be useable <p>The Chairman of the Public Protection and Enforcement Committee reminded the police that the Council had a statutory duty to scrutinise the police and MOPAC. He expressed concern that there was not a readily available pack of data that could be used as a basis for scrutiny and asked that the police provide some useful data that could be used by the PP&E PDS Committee going forward. He pointed out that this was a matter that had been ongoing for 5 years. The Chairman of the Public Protection and Enforcement Committee referenced the public attitude survey document—he said that this was an important issue and that he hoped that the PP&E PDS Committee would look at this document at its next meeting. He commented that it was just not good enough for MOPAC to say that the data was there so go and find it. He expressed the view that MOPAC (in conjunction with the police) should produce a pack that would facilitate scrutiny.</p> <p>The Assistant Director for Housing said that she just come away from a 'MACE' meeting which had been discussing the issue of crime and how it affected young people. She said that the Chairman of the Bromley Children's Safeguarding Board was keen for that Board to link up with the Safer Bromley Partnership Board.</p>

	<p>The NHS Adult Safeguarding Manager pointed out that the new Police Commissioner had made promises regarding neighbourhood policing and more visible policing and it would be interesting to see how those promises came to fruition. He commented that this was the poorest data that he had seen from the police for some time. He wondered if the provision of local data could be achieved outside of MOPAC.</p> <p>Councillor Jeal highlighted that a recent report had noted that over the previous 3-4 years, 18% of police 'hires' had been questionable with individuals being allowed to join the police despite having committed serious offences. Another report had highlighted serious failures in police disciplinary procedures. He said that currently 150 officers were on restricted duties as they were deemed to be a risk to the public. He said that the public should be informed of what was being done to resolve these matters and so provide some assurance.</p> <p>The Chairman of the Public Protection and Enforcement Committee said that MOPAC should be held to account for the lack of information that was readily available concerning their performance and that a letter should be written to them to express this concern.</p> <p>It was mentioned that previously a representative from MOPAC used to attend the meeting and so perhaps this was something that could be reinstated.</p> <p>RESOLVED that the Crime Performance Dashboard update be noted.</p>	
53	<p>PROGRESS AGAINST THE CURRENT SAFER BROMLEY PARTNERSHIP STRATEGY</p> <p>Partners noted that the number of specialist purpose meetings continued to change and increase. All partners increasingly appreciated the advantages of access to the knowledge of their inter-agency colleagues and the value of multi-agency working for the sharing of relevant intelligence and the development and implementation of best practice. Partners noted the list of multi-agency meetings and networks that were highlighted in the report.</p> <p>The update was provided by the LBB Interim Community Safety Manager and he drew the Board's attention to the Community Impact Days which were accepted as making a positive difference in communities. Partners were looking to capture points of learning from these days.</p> <p>A brief update was provided on the work of the CCTV camera operatives and the number of incidents that they had been involved with. An update was provided on the number of Trading Standards service requests and the significant amount of doorstep scams that the Team had dealt with.</p>	Action

	<p>A review was being undertaken of the Domestic Abuse Strategy with colleagues and partner agencies. Reference was made to Domestic Homicide Reviews (DHRs) and the unfortunate lessons to be learnt from them. The DHR reviews would be disseminated in due course. It was noted that a Domestic Abuse Worker was now embedded in the Community Services Safety Team and that the domestic abuse contract and plan going forward were being reviewed.</p> <p>The NHS Adult Safeguarding Manager stated that the lack of a full time Bromley MARAC coordinator was causing concern. The Police had notified the Bromley MARAC membership that they no longer had the resources to fulfil the MARAC coordination role going forward and had temporarily combined the functions of Chairman and Coordinator. Whilst the police officers involved had been doing a sterling job, this was not a sustainable situation and had resulted in numerous escalations of concerns from partners, including from members of the Domestic Abuse Health Forum regarding Bromley MARAC. There was concern that a lack of a full-time Coordinator had, and still was, having a serious detrimental effect on the running of Bromley MARAC.</p> <p>The NHS Adult Safeguarding Manager said that MARAC dealt with only the highest risk Domestic Abuse concerns and understood that the matter was the subject of an LBB Risk Register entry. Whilst MARAC members and the Safer Bromley Partnership had been given assurance in the preceding years that the coordination of MARAC was to be the subject of a business case--this had not been progressed. In response, the Chairman said that she was happy to meet with relevant colleagues and to attend MARAC meetings. She was aware that a resolution was required. Work was being undertaken to resolve the situation and funding was being sought for additional resource.</p> <p>The Board discussed the problems of 'cuckooing'. Cllr Jeal highlighted a cuckooing situation where a breakdown in communications between a housing association and the police had caused issues. The AD for Housing said that the LBB Housing Department was now more aware and better equipped to deal with cuckooing situations. There was also discussion concerning the use of mobile CCTV cameras in public spaces.</p> <p>The Chairman of the Public Protection and Enforcement PDS Committee highlighted the fact that there was no mention in the update of the Bromley Mentoring Service which now had 103 mentors. He requested that partner organisations refer into the service, as this was the only way that the service could accept new mentees.</p>
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	<p>Chief Inspector Ken Loyal explained that the Police were developing and providing training with respect to risk assessments in possible cases of Domestic Abuse. Officers would refer to specialist services if necessary. He also mentioned the 'Walk and Talk' strategy where members of the public could walk and talk with police officers in a safe environment. He highlighted two police operations that were currently underway one of which was called 'Operation Vigilant' where plain clothes officers were operating in the night time economy.</p> <p>It was noted that that a consultation would be held with respect to spiking. The LFB Commander said that training was being provided to fire service officers with respect to vulnerable residents and he felt that Community Impact Days were very effective and had reduced incidences of arson. The London Fire Brigade were also keen to support the Bromley Mentoring Service.</p> <p>RESOLVED that progress against the current SBP Strategy be noted.</p>	
54	<p>PROGRESS REGARDING THE DEVELOPMENT OF THE SAFER BROMLEY PARTNERSHIP STRATEGY FOR 2024-2027</p> <p>The recommendation was that the Safer Bromley Partnership (SBP) agreed to the proposal for the creation of six task and finish groups to focus on existing priorities as outlined below:</p> <ul style="list-style-type: none"> • Steering Group: - General oversight and management of all the T & F groups. Provide updates on progress to future SBP meetings. - Draft 2024-27 Plan • Data Group: Gathering, sifting and sharing local data from relevant agencies (Police, Fire, Health, Council, Probation, etc) to provide trend data and evidence for possible priorities and actions by the CSP. Identify any emerging issues or concerns. • Safer Neighbourhoods Group: Review work of the group to date: successes & challenges, consider issues ahead, draft smart proposals & actions • Domestic Abuse / VAWG Group: Review work of the group to date: successes & challenges, consider issues ahead, draft smart proposals & actions • Keeping Young People Safe Group: Review work of the group to date: successes & challenges, consider issues ahead, draft smart proposals & actions • Hate Crime and Extremism Group: Review work of the group to date successes & challenges, consider issues ahead, draft smart proposals & actions 	Action

	<p>The list of groups was not final and would be subject to review.</p> <p>The LBB Interim Community Safety Manager outlined the way forward as follows:</p> <p>A Steering Group would have oversight, decision making and reporting requirements.</p> <p>Task and Finish Groups would:</p> <ul style="list-style-type: none">• Review their element of the current 2020-2023 Plan• Identify success, journey travelled, and whether there are any new issues, emerging concerns, new legislation, or guidance.• Begin creating a three-year plan for 2024-27, based on and using appropriate evidence/data• All Groups to submit their plans using common pro-forma (for consistency)• Draft Strategy produced & 'stress tested'• Shared for comment & critical appraisal <p>The Final Plan would be agreed and submitted to the SBP meeting in December 2023 for adoption/approval. The Plan would need to be in place by April 2024</p> <p>The NHS Adult Safeguarding Manager reminded partners that there would be new duties and responsibilities required soon because of the Police and Courts Act, and this Act would need to be taken into consideration when developing the new SBP Strategy.</p> <p>RESOLVED that the final version of the revised Safer Bromley Strategy would be agreed and submitted to the SBP meeting in December 2023 for adoption and approval.</p>	
55	<p>PROBATION SERVICES UPDATE</p> <p>Mr Lucien Spencer (Head of Service for the Probation Delivery Units in Bromley and Lewisham) attended to provide the update. He gave a PowerPoint presentation and this is amended to the minutes. In response to a question he said that the IOM (Integrated Offender Management) Framework had changed and that mechanisms were in place to manage offenders effectively. The emphasis of the PDU was to effectively manage high risk and complex individuals. It was commented that it was important to keep victim services updated. Mr Spencer was asked if he could present at the Domestic Abuse Operational Forum. Mr Spencer responded that he would be happy to do so if required. It was noted that another review would not be expected for another three years.</p>	Action

	RESOLVED that the Probation Services Update be noted.	
56	DHR AND PREVENT UPDATE <p>The Head of Trading Standards and Commercial Regulation provided the following written update in his absence:</p> <p><u>Prevent</u></p> <p>It was almost 4 years since the Government commissioned a review of the Prevent Strategy. It was hoped that the report would be published by April this year.</p> <ul style="list-style-type: none"> • Islamist Extremism continued to be the predominant threat and risk in London. • The threat and risk from Extreme Right Wing Terrorism (ERWT) had not significantly increased in the last 12 months. • Mixed, Unclear, Unstable (MUU) Prevent referrals were increasing, however very few presented a genuine threat or risk, or were escalated to Channel. • Self-radicalisation online was a continuing threat <p><u>Channel</u></p> <p>Within Bromley, the Channel Panel met monthly to consider any referrals of individuals deemed at risk of radicalisation, and LBB would be introducing a new Chairman for the Panel in the next few months – Vicky West, LBB Assistant Director of Children's Services.</p> <p><u>Domestic Homicide Reviews</u></p> <p>No change to the update at the previous meeting. Three DHRs were active, two related to suicides. One DHR remained with the Home Office – LBB had been assured that the report would be signed off by March 2023.</p> <p>RESOLVED that the DHR and Prevent update be noted.</p>	Action
57	EMERGING ISSUES	Action
	No emerging issues were reported at the meeting.	
58	AOB	Action
	The Chairman of the Public Protection and Enforcement Committee said that the deaths of road users were now in the region of 3800 per year. In his view that would constitute a 'high harm a crime'. He expressed the view that a letter should be written to MOPAC saying	

Safer Bromley Partnership Board
12 January 2023

	that police officers were required to patrol the streets and roads to deal with speeding.	
59	DATE AND TIME OF NEXT MEETING The date of the next meeting was confirmed as the 7th of March 2023 at 10:30am in the Council Chamber.	Action

Presentation from Head of Service for Bromley and Lewisham Probation Delivery Unit

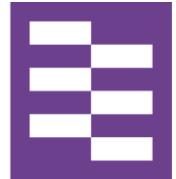
The Meeting ended at 12.30 pm

Chairman



HM Prison &
Probation Service

Probation
Service



HMIP PDU Inspection – Lewisham and Bromley

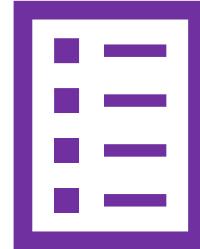
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January 2023

Minute Annex

Context

- Lewisham and Bromley (LAB) probation delivery unit were subject to an inspection in the summer of 2022
- The inspection was announced towards the end of June 2022, with fieldwork taking place during the week of 22 August 2022.
- The inspection was supported by fieldwork surveys completed with people on probation, the week prior to a review of cases
- 42 cases were inspected across the PDU, which constitutes about 0.02 of the overall caseload
- LAB was one of six PDU's inspected across the London region
- Three inspection reports, relating to the areas of Hammersmith, Fulham, Kensington, Chelsea & Westminster; Lambeth; and, Ealing & Hillingdon were published on 18 October 2022
- The inspection report for LAB was published on 21 November 2022, alongside Barking, Dagenham & Havering; and, Newham



Inspectors use the standards to ask the right questions and look for evidence to rate the quality of service delivery across each aspect of a service.

Probation inspection:

[Standards for inspecting probation Services \(PDF, 351 kB\)](#), updated July

Page 021
33

PDU standards – Domain one

- Leadership
- Staff
- Services
- Information and facilities

PDU standards – Domain two

- Court work
- **Assessment**
- **Planning**
- **Implementation and delivery**
- **Reviewing**
- **Outcomes**
- Statutory victim work

HMIP's Rating model- an example

Assessment

Requires Improvement

Does assessment focus sufficiently on engaging the person on probation?	#	%
Yes	30	75%
No	10	25%

Does assessment focus sufficiently on the factors linked to offending and	#	%
Yes	28	70%
No	12	30%

Does assessment focus sufficiently on keeping other people safe?	#	%
Yes	24	60%
No	16	40%

In this example, the scores for two of the key questions under the Assessment standard fall into the 'Good' band, but as the score for the final key question is in the 'Requires improvement' band, the overall standard is rated as 'Requires improvement'

Lowest banding (proportion of cases judged to be sufficient at key question level)	Rating (standard)
Minority: <50%	Inadequate
Too few: 50-64%	Requires improvement
Reasonable majority: 65-79%	Good
Large majority: 80%+	Outstanding ★

Overall Rating

Straightforward scoring rules are used to generate the overall provider rating. The Outcomes standard is not rated. Each of the other nine standards is scored on a 0–3 scale:

- ‘Inadequate’ = 0
- ‘Requires improvement’ = 1
- ‘Good’ = 2
- ‘Outstanding’ = 3

Adding these scores produces a total score ranging from 0 to 27, which is banded to produce the overall rating, as follows:

- 0–4 = Inadequate
- 5–13 = Requires improvement
- 14–22 = Good
- 23–27 = Outstanding

In those exceptional instances where there is no rating for court work, as a result of the SJD not delivering services to any court, the following bands are used for the 0–24 score range:

- 0–4 = Inadequate
- 5–12 = Requires improvement
- 3–20 = Good
- 21–24 = Outstanding

LAB Outcomes – Domain one

1. Organisational delivery

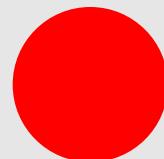
1.1 Leadership	Requires improvement	
1.2 Staff	Requires improvement	
1.3 Services	Requires improvement	
1.4 Information and facilities	Requires improvement	

LAB Outcome – Domain Two

Court work and case supervision

Assessment

Inadequate



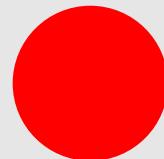
Planning

Inadequate



Implementation and delivery

Inadequate



Reviewing

Inadequate



Recommendations

1. improve the quality of work to assess, plan for, manage and review risk of harm
2. ensure risk related information is obtained from and shared with other agencies in all relevant cases to support the assessment and management of risk of harm
3. improve the effectiveness of quality assurance and management oversight of all casework
4. ensure that the interventions necessary to improve desistance and reduce reoffending and risk of harm are provided in all cases
5. ensure sentence management staff receive the training they need in order to fulfil their roles effectively
6. ensure appropriate management information is available to analyse and consider any potential disproportionality in the quality of service delivery to people on probation from ethnic minority backgrounds.

Actions Undertaken

- A feedback session was undertaken within the PDU in October 2022, with the lead inspector, to review the key learning areas
- HMIP Action plan was completed in November 2022. The actions from LAB were wrapped into a pan-London action plan
- As a region, a Quality Improvement Programme was commenced in November 2022, reflecting the outcomes of the HMIP inspection, and findings from a pan-learning internal inspection conducted by the operational assurance group (OSAG) in HMPPS in 2021
- The most recent OSAG audit, concluded in December 2022, demonstrated a 6% uplift in the overall score
- Significant recruitment and retention activity continues – for example, 3 Newly Qualified Officers are joined the PDU in November, and 6 new Probation Service Officers have joined since July 2022
- As a PDU, specific strategies have been implemented to support learning and development (learning into practice forum; risk management panels, female service user strategy)

Overview of Quality Improvement Programme – Nov '22 to June 23



Any Questions?

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Agenda Item 13

Report No. CSD 23015

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: Safer Bromley Partnership Board

Date: 12th January 2023

Decision Type: Non Urgent Non Executive Non Key

Title: MATTERS ARISING

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 the Board on matters arising/outstanding from previous meetings.

2. RECOMMENDATION

- 2.1 The Board is asked to review progress on matters arising/outstanding from previous meetings.

Non-Applicable Sections:	Policy/Financial/Legal/Personnel
Background Documents: (Access via Contact Officer)	Minutes of the last meeting.

Corporate Policy

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

Financial

1. Cost of proposal: No Cost
 2. Ongoing costs: Not Applicable
 3. Budget head/performance centre: Democratic Services
 4. Total current budget for this head: **£358,740**
 5. Source of funding: 2022/23 revenue budget
-

Staff

1. Number of staff (current and additional): 7
 2. If from existing staff resources, number of staff hours: Completion of "Matters Arising" reports for PP&S PDS meetings and partnership groups can take up to a few hours per meeting.
-

Legal

1. Legal Requirement: The Safer Bromley Partnership (SBP) has been constituted to comply with the Crime and Disorder Act 1998 (as amended by section 97 and section 98 of the Police Reform Act 2002 and section 1 of the Clean Neighbourhoods and Environment Act 2005). The 'Responsible Authorities' identified by the Act have a statutory duty to work with other local agencies and organisations to develop and implement strategies to tackle crime and disorder including anti-social and other behaviour adversely affecting the local environment as well as the misuse of drugs in their area.
 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 Safer Bromley Partnership Board. The work of the Group is wide ranging, dealing with crime and disorder, resilience, drug mis-use, anti-terrorism strategies, domestic abuse, offender management and ASB/Envirocrime. It also deals with youth offending and gangs. This being the case, the impact of the areas covered is borough wide.
-

Ward Councillor Views

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

Appendix A

<u>Minute Number/Title</u>	<u>Matters Arising</u>	<u>Update</u>
Minute 39a 27 th October 2022. Standing Together against Hate Crime and Extremism	It was agreed that the Priority 4 update regarding Standing Together Against Hate Crime and Extremism be noted and that the LBB Assistant Director for Public Health report back on the LBB Public Health Department's contacts for the Gypsy and Traveller Community.	Our Public Health Nurses have established links with the Community Leaders and Gypsy, Roma and Travellers Community and may be able to assist in engaging with the community as appropriate. Any request for support should be directed to Gillian Fiumicelli, Head of Vascular Disease Prevention Programme, in the first instance. Since the last meeting, the Head of Service – Community Safety, Licensing, Environmental & Domestic Regulation was introduced to the Public Health Team in this regard.
Minute 41 27 th October 2022. Developing the SBP Strategy	It was resolved that the update concerning developing the Safer Bromley Strategy and the task and finish groups be noted and that the Head of Community Safety, Environmental, and Domestic Regulation present a time scale for the work of the steering groups at the next meeting.	An update will be provided at the meeting.
Minute 42 27 th October 2022 Violence Reduction Plan Verbal Update	It was resolved that the Violence and Vulnerability Action Plan would be shared with partners shortly.	An update will be provided at the meeting.
Minute 46 27 th October 2022 AOB	It was agreed that the Head of Service (PDU) Bromley & Lewisham would disseminate the HMIP report to Partners and provide a summary report to be presented at the next meeting.	Awaiting update.
Minute 46 27 th October 2022 AOB	The Head of Trading Standards and Commercial Regulation would investigate if scam alerts could be disseminated to all LBB staff and would link with LFB in drafting guidance related to the possible fire risks of second-hand electrical goods.	Closed. An update was emailed to Partners on 29 th December.

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Safer Bromley Partnership Crime Performance Dashboard

January 23 Update

Crime figures for all relevant categories of crimes are now published online through the Metropolitan Police website at <https://www.met.police.uk/sd/stats-and-data/>

This site also includes detection rates, stop and search data, use of force data and a wide range of other materials. Data previously supplied through the MOPAC website is now directed here. At the time of writing, data in relation to the volume of ASB calls has not been produced.

Metrics for the 3 MOPAC sub-priorities:

- Non-domestic violence with injury
- Residential burglary
- ASB

In addition to the above, data on the following has been included:

- Total Notifiable Offences (TNO) with a breakdown of offence types per category.

Then individual offence types and links to the priorities have been included:

- Total Burglary
- Theft of Motor Vehicles
- Knife Crime Offences (links with Priority 3 – Keeping Young People Safe)
- Domestic Abuse (links with Priority 2 – Violence Against Women and Girls)
- Hate Crime (links with Priority 4 – Stand Together Against Hate Crime and Extremism)

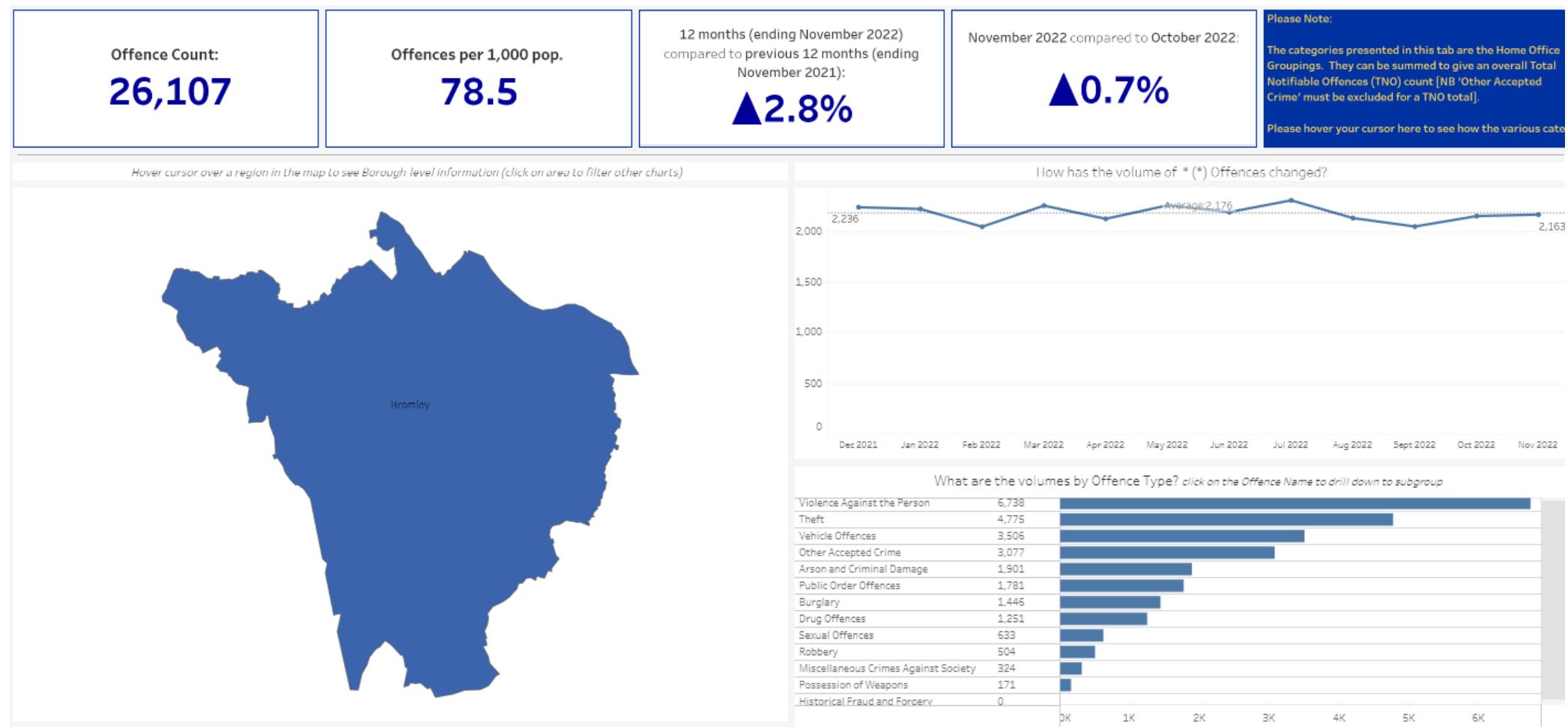
Data has been provided in greater detail than previous updates and in a different format to reflect the material publicly available. This is accessible via the website for every Borough in London but in this instance relates to Bromley.

The data provided is for the 12 months to November 2022 compared to the same period in the previous year.

Total Notifiable Offences (TNO's)

The table shows volume of crime for Bromley and the below table provides an explanation for the type of offences which comprise each category.

The tables show an increase in TNO offences overall following a decrease in Q2. Percentage decreases for some areas of crime noticeably burglary and hate crime. Significant percentage increases seen in knife crime and sexual offences. However, actual offences numbers remain low.



TNO - Total Notifiable Offences: Any Notifiable Offence (as defined by the Home Offence)

Arson and Criminal Damage: 'Arson', 'Criminal Damage'

Burglary: 'Residential Burglary', 'Burglary of Business\Community Premises'

Drug Offences: 'Drug Offences' and 'Possession of Drugs'

Possession of Weapons: 'Possession of Firearms Offences', 'Possession of Firearm with Intent', 'Possession of Article with Blade or Point', 'Possession of Other Weapon', 'Other Firearm Offences', 'Other Knife Offences'

Public Order Offences: 'Violent Disorder', 'Public Fear Alarm or Distress', 'Racially or Religiously Aggravated Public Fear', 'Other Offences Against the State, or Public Order'

Robbery: 'Robbery of Personal Property', 'Robbery of Business Property'

Sexual Offences: 'Rape', 'Other Sexual Offences'

Theft: 'Theft from Person', 'Shoplifting', 'Bicycle Theft', 'Other Theft'

Vehicle Offences: 'Theft or Taking of a Motor Vehicle', 'Theft from a Motor Vehicle', 'Aggravated Vehicle Taking', 'Interfering with a Motor Vehicle'

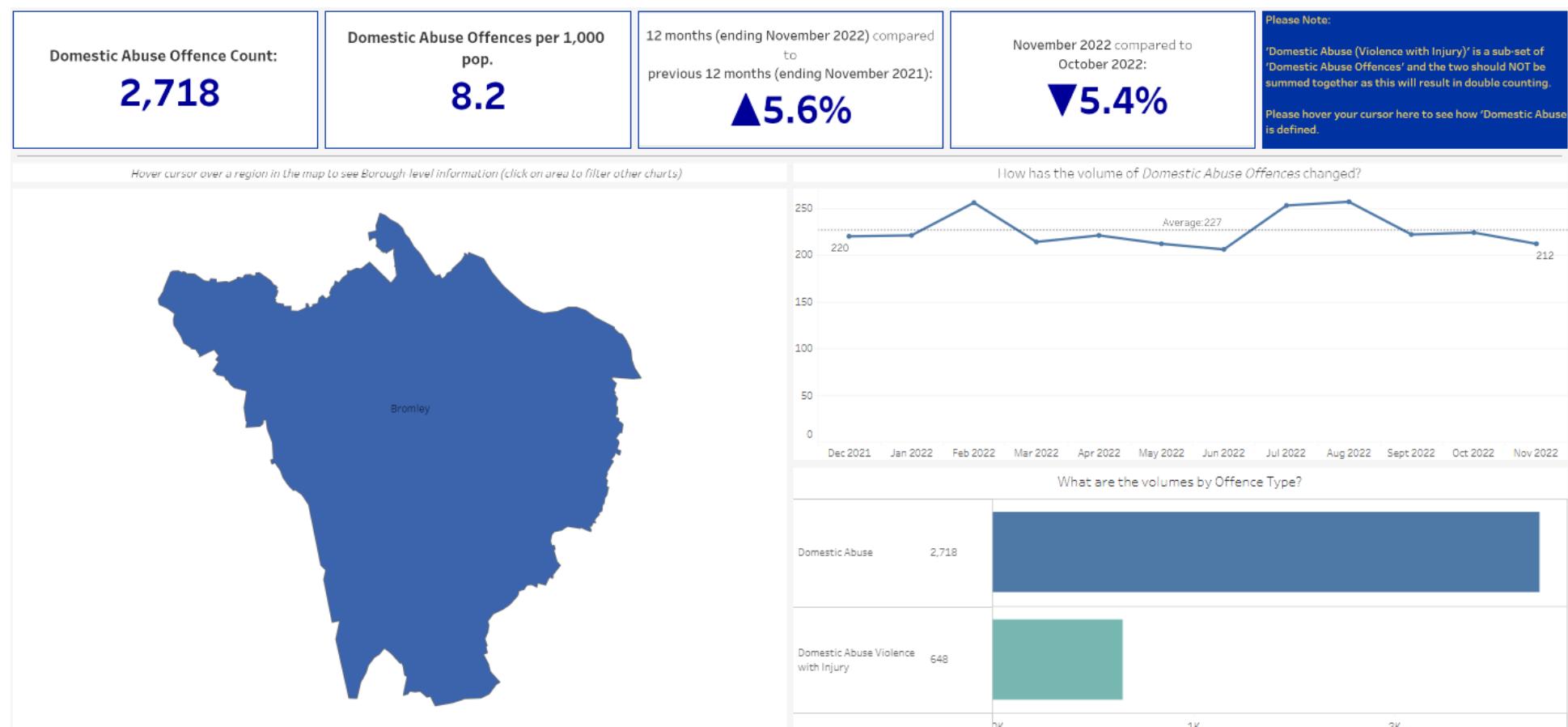
Violence Against the Person: 'Homicide', 'Violence with Injury', 'Violence without Injury'

Historical Fraud and Forgery: 'Fraud and Forgery'

Miscellaneous Crimes Against Society: 'Concealing an Infant Death Close to Birth', 'Going Equipped for Stealing', 'Wildlife Crime', 'Handling Stolen Goods', 'Making, Supplying or Possessing Articles for use in', 'Bigamy', 'Obscene Publications', 'Disclosure, Obstruction, False or Misleading Statement', 'Exploitation of Prostitution', 'Forgery or Use of Drug Prescription', 'Fraud or Forgery Associated with Driver Records', 'Bail Offences', 'Threat or Possession With Intent to Commit Crime', 'Soliciting for Prostitution', 'Profiting From or Concealing Proceeds of Crime', 'Possession of False Documents', 'Perverting Course of Justice', 'Perjury', 'Other Notifiable Offences', 'Other Forgery', 'Offender Management Act', 'Dangerous Driving', 'Absconding from Lawful Custody', 'Aiding Suicide'

Other Accepted Crime: any 'Other Accepted Crime' [NB Non-notifiable]

Domestic Abuse



Domestic Abuse Definitions

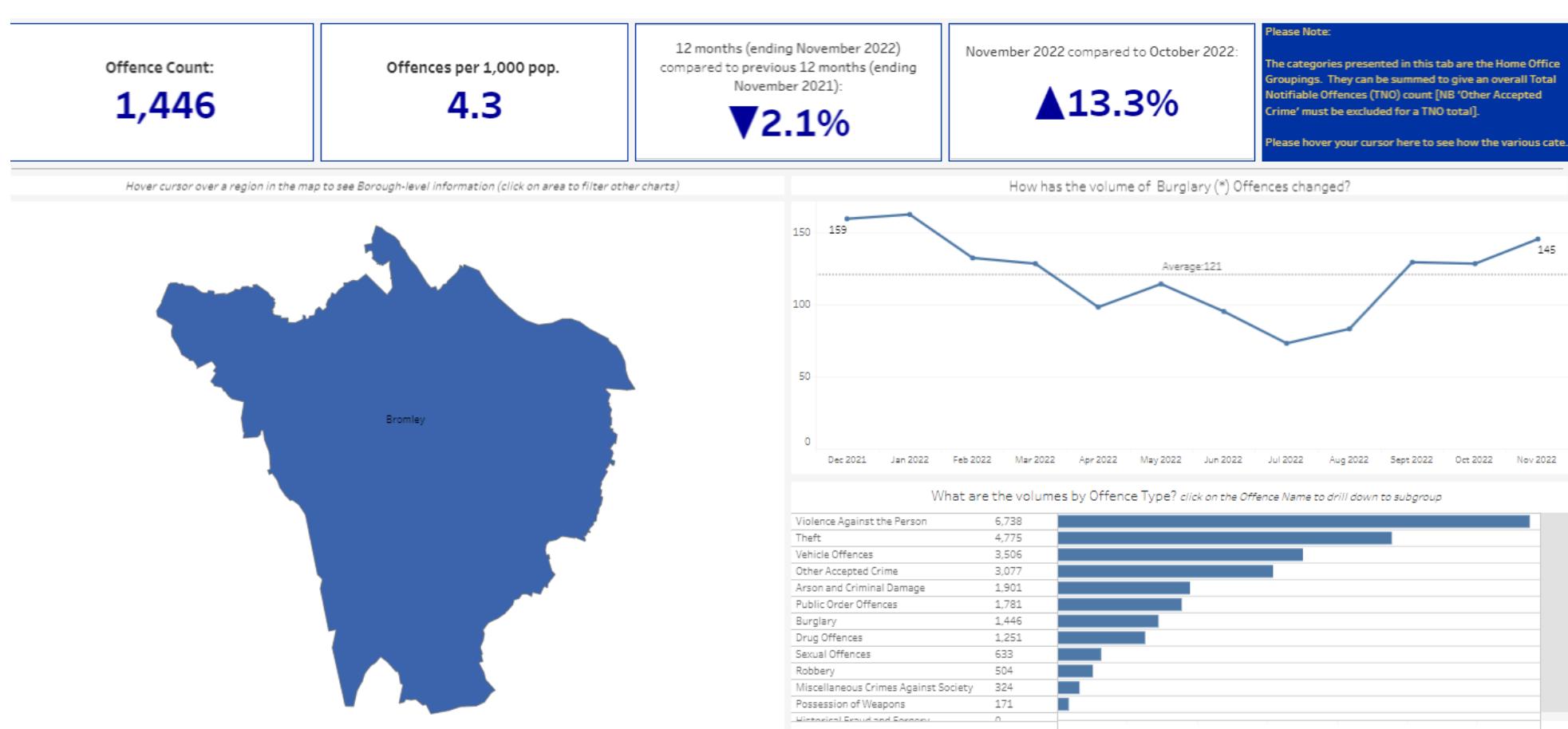
Domestic Abuse Offences

Any Notifiable Offence record that has had one or more 'Domestic Abuse' flags added

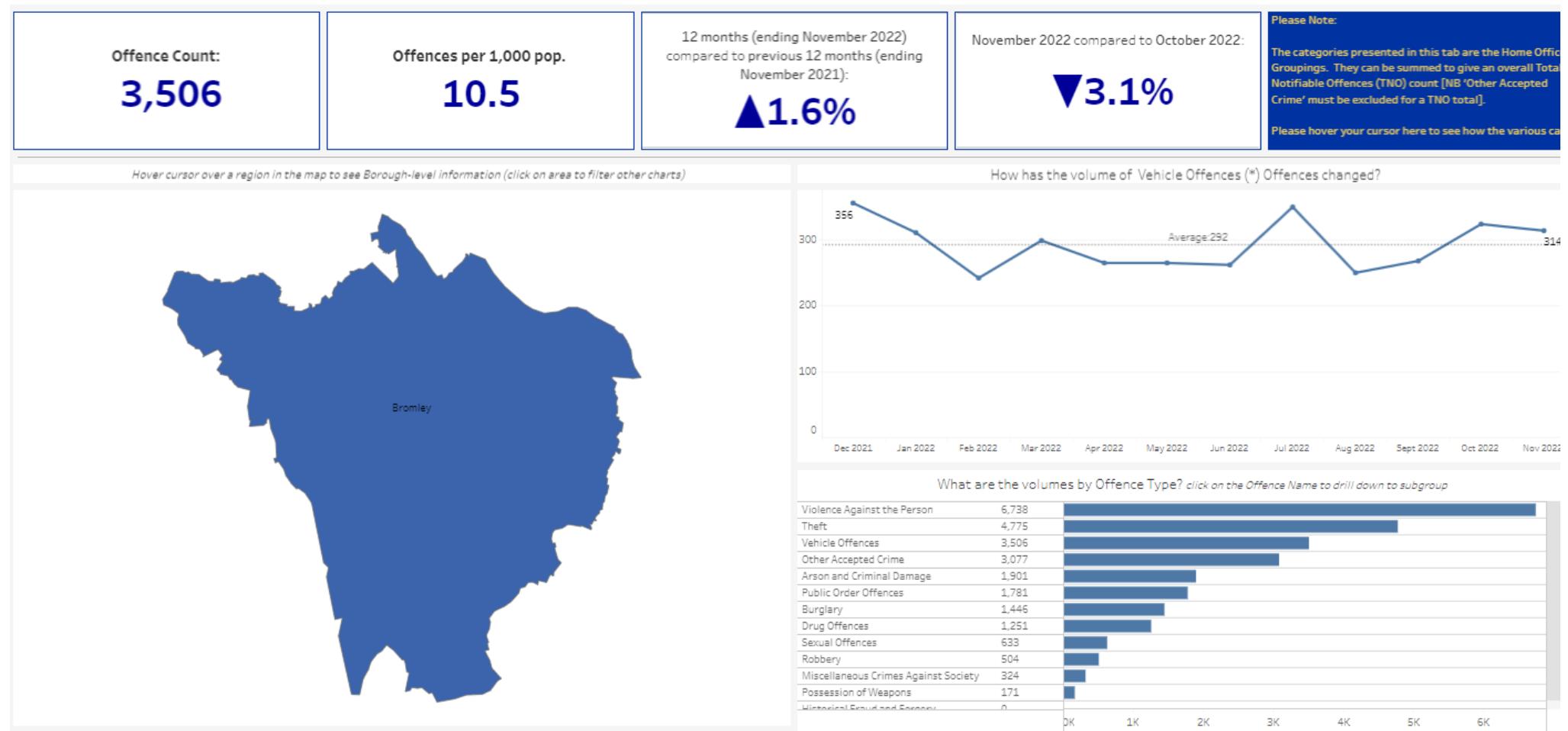
Domestic Abuse Violence with Injury Offences

Any 'Violence with Injury' Offence record that has had one or more 'Domestic Abuse' flags added

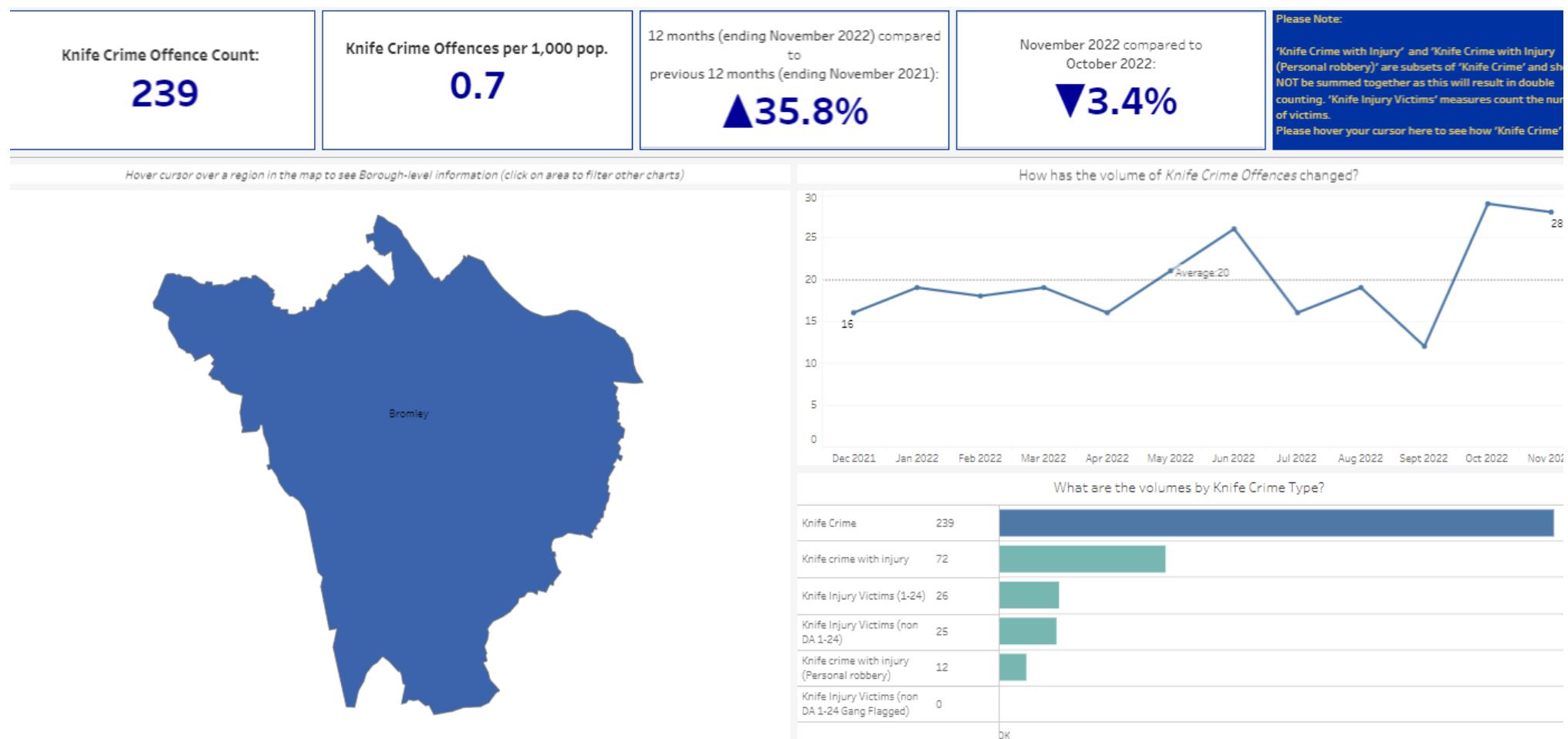
Burglary



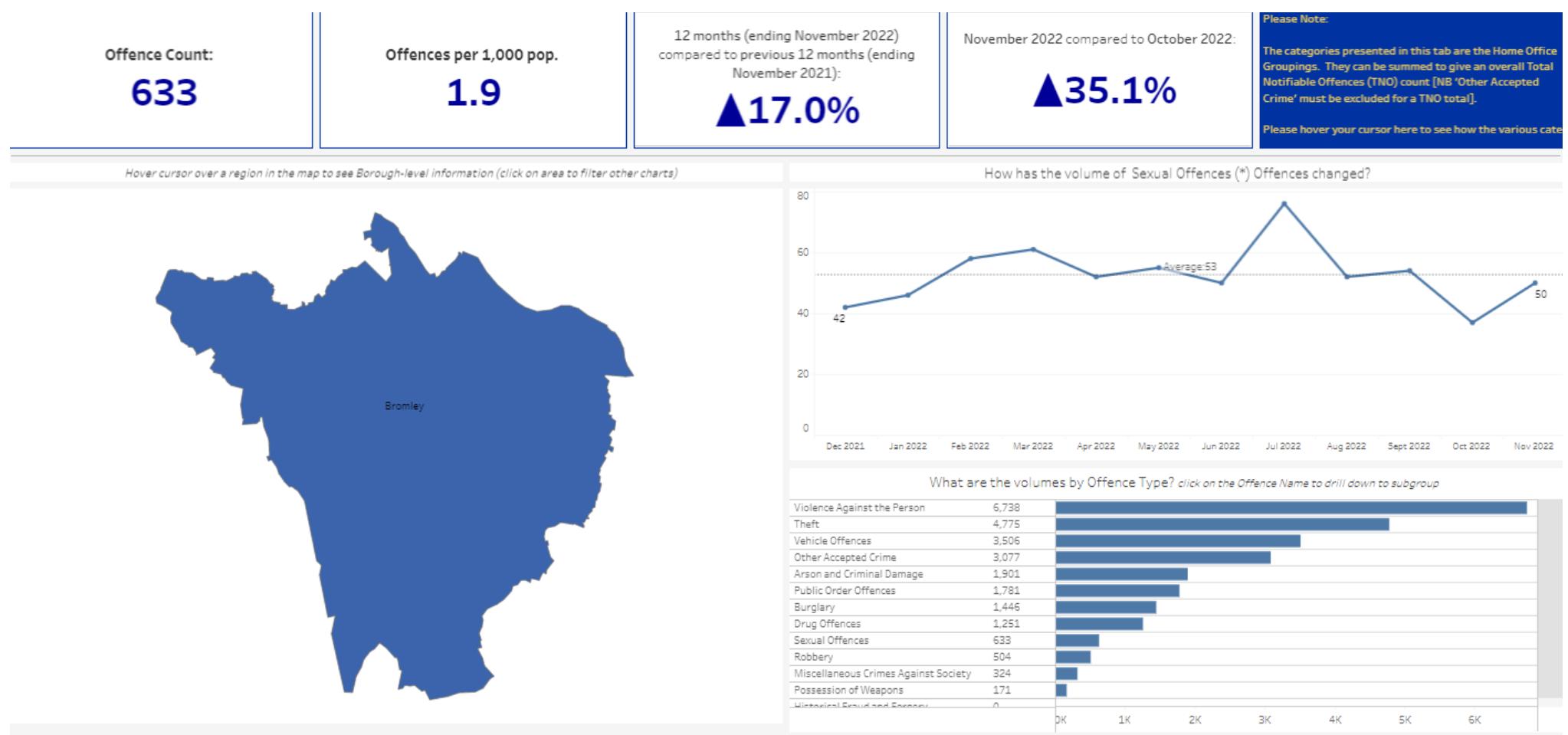
Vehicle Offences – Theft of, TWOC (TDA), Aggravated Taking and Interference



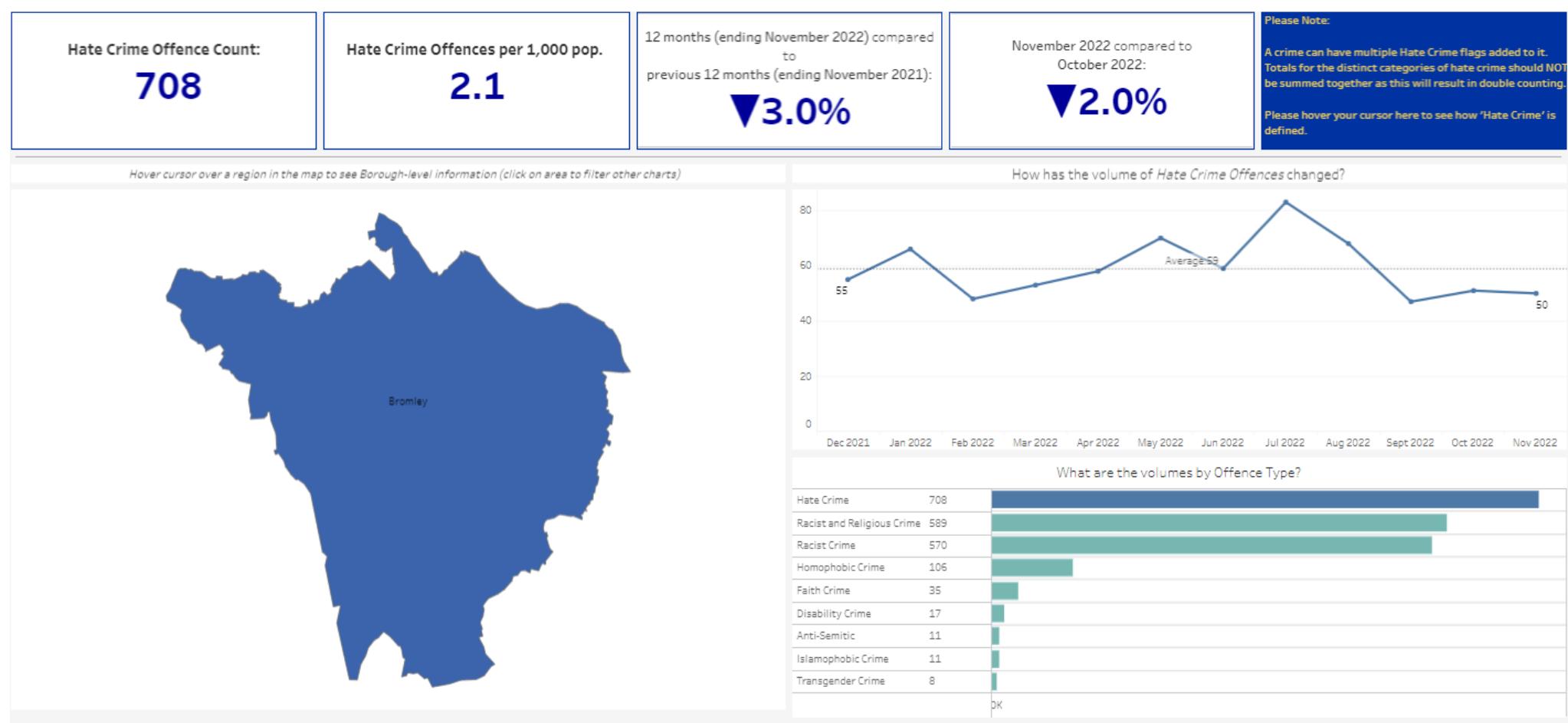
Knife Crime



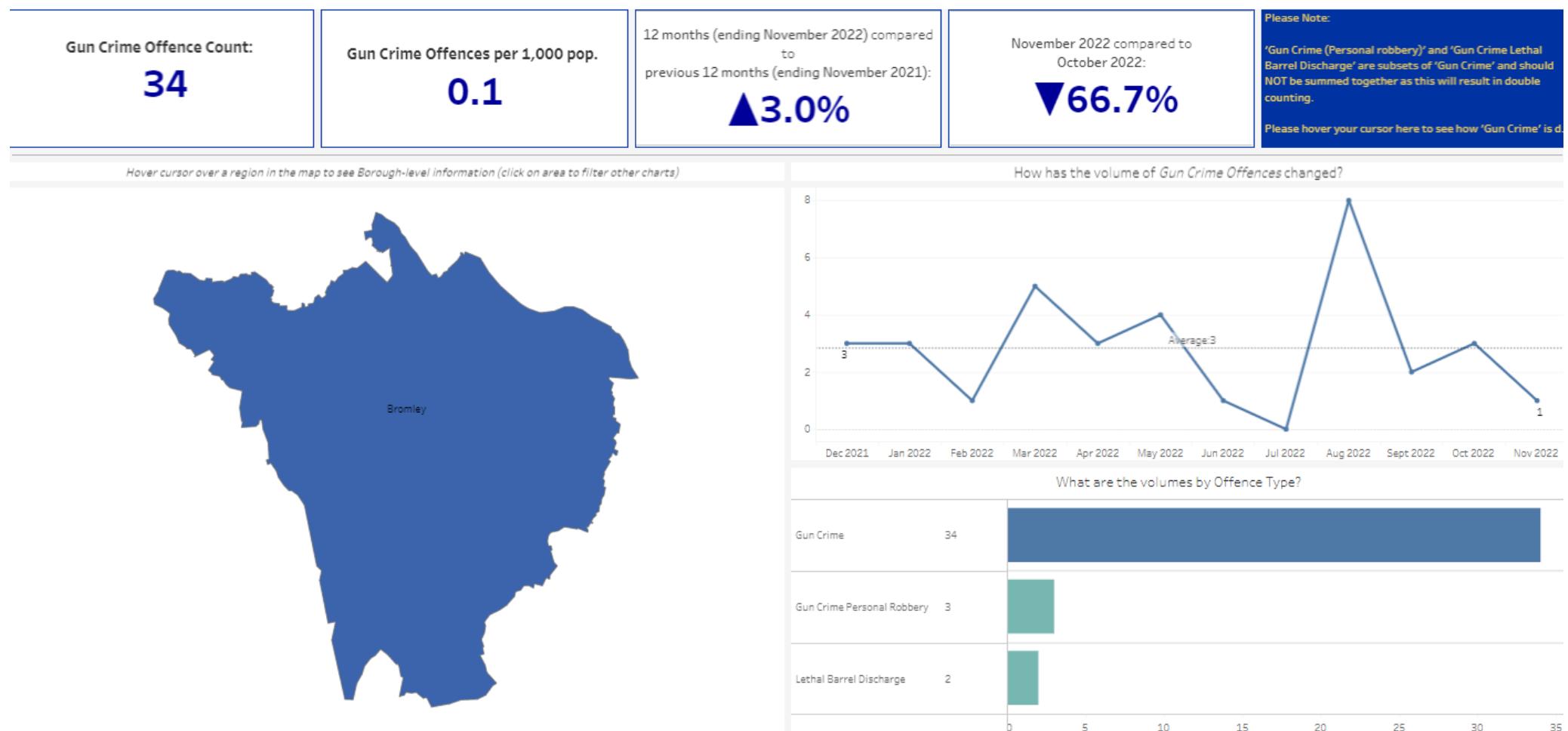
Sexual Offences



Hate Crime



Gun Crime



Gun Crime Definitions

Gun Crime

Gun Crime offences are categorised as such if they satisfy the following criteria:

1. The offence classification is any notifiable offence AND The crime report includes one of the feature codes identifying that a firearm has been used AND The crime report includes one of the feature codes for barrelled firearms
OR
2. The offence classification is one of 'Possession of a Firearm with Intent' AND The crime report includes one of the feature codes for barrelled firearms

Gun Crime (Personal Robbery)

Gun crime offences classified as 'Personal Robbery'

Gun Crime Lethal Barreled Discharge

Gun Crime offences where a Lethal Barreled weapon was discharged.
'Lethal Barreled' weapons exclude air guns, bb guns, starter pistols etc.

Priority 1 – Safer Neighbourhoods	
2022/23 Quarter 3 - Update	
Main Partners – Police & LBB Community Safety	
<p>This priority looks at the crimes and anti-social behaviours (ASB) that concern our residents the most, and that the Mayor's Office for Policing & Crime (MOPAC) and the London Borough of Bromley (LBB) have identified as being most relevant to our Borough.</p> <p>The main partners for this priority are the Police Borough Command Unit (BCU), the Police Safer Neighbourhood Teams (SNTs) LBB Community Safety and Trading Standards teams who work in partnership. We target resources in those wards and areas that are identified as hot spots. The 4 sub-priorities under Priority 1 are:</p> <ul style="list-style-type: none"> • Non-domestic violence with injury • Residential burglary • ASB • Crimes against the elderly and vulnerable (inc. financial abuse) <p>The relevant crime metrics are provided in the crime update towards the end of this document.</p>	RAG Status
<p>1. Improve partnership and stakeholder engagement and collaboration</p> <p>Improved communication between all interested parties, to ensure that stakeholders can provide feedback on their concerns, and that the work of partners is optimised through aligning strategic aims, targeting resources based on evidence, and by avoiding duplication.</p> <p>There is good inter-agency communication between the Police BCU, SNTs and LBB services which has withstood the changes in key personnel of both agencies over the last year. The actions for the above are evidenced in the following sections.</p>	Achieved
<p>A framework will be established for consultation and engagement with partners and the wider community through networks, meetings, and other mechanisms (email, bulletins etc).</p> <p>The following multi-agency meetings occur on a regularly basis. LBB also arrange specific project groups to address site-based issues that may involve several enforcement teams and/or service areas operating in consort.</p>	Achieved
Anti-Social Behaviour Panel (ASBP)	

The purpose of the group is to ensure a multi-agency panel to discuss and act regarding individuals causing ASB. Standing members are the SNTs, registered social landlords (RSLs), mental health support services (Oxleas), Adult Safeguarding, Children's Services, Change Grow Live, Community Safety and Statutory Nuisance & ASB.

Multi Agency Response to Anti-Social Behaviour (MARASB)

The purpose of this higher-level group is to make sure that people who are identified as causing ASB are either helped, if health issues are a contributory issue, or that effective enforcement action is taken. Cases are RAG rated and risk assessed. Standing members are the Police, Community Safety, RSL's and mental health support services (Oxleas).

ASB Action Group (ASBAG)

The purpose of the group is to share intelligence and develop actions to address area based ASB, e.g., that which occurs in car parks, shopping centres, green spaces, etc. Standing members include the SNTs, Community Safety, Statutory Nuisance & ASB, Planning Enforcement, CCTV, Neighbourhood Enforcement and Ward Security.

Self-Neglect & Hoarding Panel (SN&HP)

The purpose of this group is to address hoarding and ensure vulnerable residents are kept safe. Standing members include Statutory Nuisance & ASB, RSLs, Private Rented Sector Housing Enforcement & Adult Safeguarding.

Reducing Offending & Re-offending, Youth Subgroup (ROAR)

The purpose of this group is as stated. Standing members include BCU Police, SNTs, Community Safety, Probation, Youth Justice Services (formerly YOS & YOT) & Children's Social Care.

Missing Exploited & Gang Affiliated (MEGA)

The purpose of this group is as stated. It ensures early intervention, wrap around family support services, and appropriate enforcement regarding Bromley children falling towards or in gang affiliation. Standing members include the BCU Police, Police Trojan team (Gangs), Community Safety, Youth Justice Service, and the Atlas team from Children's Social Care)

As well as the above, LBB staff also organise and/or attend the following multi-agency meetings and networks:

- **BCU Daily Crime Grip** – for swift notification of significant crimes to the Community Safety Teams of the 3 boroughs (Bromley, Croydon, & Sutton)
- **Tactical Targeting & Co-ordination Group** – for the analysis of crime data and tactical responses to policing and SBPB priorities
- **London Heads of Community Safety** – for all London Borough Community Safety Heads of Service and MOPAC to share information, good practice, and relevant bid information
- **Pan London Hate Crime Forum** – for the Met Police, MOPAC and all London Borough Community Safety Heads of Service to share information, good practice, review Police BCU performance and relevant bid information
- **Integrated Offender Management Panel** – for the management of and location tracking of offenders in the community
- **Multi-Agency Public Protection Arrangements** – for risk management of violent and sexual offenders living in the community
- **Multi Agency Risk Assessment Conference** – for domestic abuse related adult safeguarding

<ul style="list-style-type: none"> • Domestic Abuse Operational Forum – for the operational management of domestic abuse cases • South London Alliance Delivery Group – for the co-ordination of service provision for female offenders on release • Muti Agency Safeguarding Hub – for children at risk • Multi Agency Child Exploitation – for children at risk of criminal and sexual exploitation • Substance Misuse in the Criminal Justice System Working Group – for the reduction of and improvement of the management of offenders with addiction and drug use issues • Adult Safeguarding Reviews • Domestic Homicide Reviews • Prevent & Channel Panels • Combatting Drugs & Alcohol Partnership • London Drugs Forum • Hate Crime Panel (LAs covered by South BCU) • Joint Action Group <p>The number of specialist purpose meetings continues to change and increase. All partners increasingly appreciate the advantages of access to the knowledge of inter-agency colleagues and the value of multi-agency working for the sharing of relevant intel and developing and implementing best practice.</p>	
<p>Community Impact Days (CIDs)</p> <p>CIDs are held 12 times a year (one each month), to address hot-spot areas and reduce the number of reports for ASB, fly-tipping, arson, graffiti, weapons, nuisance vehicles, etc.</p> <p>The monthly CID's have continued to expand regarding both the number of partners involved and the types of neighbourhood crime deterred. The outputs of the CIDs are regularly reported to the Public Protection and Enforcement PDS Committee. Recent additions to activities include the marking of catalytic convertors, the involvement of DVLA and the inclusion of Community Payback and YJS service users as part of the team undertaking area improvement and clean-up actions.</p> <p>The CIDs are highly valued by all involved partners and the community and make a measurable difference in the 4 wards in which they operate. Following the ward boundary changes and the receipt of the crime needs analysis the ward areas will be reviewed later in the year to ensure they are being deployed in the optimal areas of the borough</p> <p>Q1 Update – There were 3 CIDs in Q1. All highly successful. Q2 Update – There were 3 CIDs in Q2. All highly successful. The review of the CID wards will commence in Q3 Q3 Update – there were 3 CIDs in Q3. All successful. The review of the CID wards is still in progress.</p>	Achieved
<p>The Police's Safer Neighbourhood Teams (SNTs) will better protect and support vulnerable children and adults</p>	Achieved and continues

The SNTs are currently working in the following ways to support vulnerable children and adults:

- Protecting children and vulnerable adults from crime e.g., by monitoring sex offenders and gangs and tasking to crime hot spots
- Providing advice and equipment to people who have been victims of crime e.g., Smart water, Catalytic Converter marking, home security advice
- Assisting people who might be vulnerable to crime and working with partners to reduce crime and referring to victim support
- Referral of vulnerable adults and children to appropriate support and care services through the Merlin system
- Working with young people so that they don't become involved in crime e.g., school visits and providing access to diversionary activities
- Solving problems that are causing crime e.g., advising where street lighting could be improved
- Addressing drug and alcohol enabled crime e.g., by referring drug users for rehabilitation services

2. Use an intelligence led approach

Through use of crime data analysis, intelligence from other agencies, the public, and from group tasking and other meetings (such as those listed on page 1), enforcement and service provision agencies identify, track, and respond to local crime trends, providing real time activities to address local crime concerns.

**Achieved
and
continues**

3. Make Use of Legislation

Through appropriate use of various legal tools and powers including the Environmental Protection Act 1990, the Antisocial Behaviour Crime and Policing Act 2014, and the plethora of criminal legislation, enforcement officers ensure that all available remedies are considered, including the use of Nuisance Abatement Notices, Dispersal Orders, Community Protection Warnings, Community Protection Notices, Public Space Protection Orders, Licensing reviews, Proceeds of Crime Act requisitions, etc. All formal enforcement actions are subject to tests of necessity, appropriateness, and proportionality, and solutions may involve restorative justice, providing support, and/or addiction treatment as well as the more traditional community sentences, fines, and imprisonment.

Both the SNT Police and the LBB Statutory Nuisance & ASB team use Acceptable Behaviour Contracts to control and reduce anti-social behaviour by individuals.

LBB has Public Space Protection Orders (PSPOs) that provide controls for:

- Dog nuisance
- Nuisance behaviour due to being intoxicated from drinking alcohol in public spaces
- Nuisance behaviour due to being under the influence of psychoactive substances in public spaces, and
- Public toileting in public spaces

Enforcement officers are trained in and assess new legislation on its enactment, to ensure any new or novel powers are effectively and properly used for the general benefit of Bromley residents.

Achieved

<p>4. Reduce Violence</p> <p>Reduction of violence is delivered via the work streams identified within the:</p> <ul style="list-style-type: none"> • Violence & Vulnerability Action Plan (VVAP) • Gang Violence Matrix • Violence Against Women & Girls Strategy • Youth Justice Strategy • Police led Violence Reduction Team, and the • MOPAC Violence Reduction Unit <p>LBB officers work to ensure that, as the strategies listed above come up for review and renewal, they consider each other's content and undertake gap analysis to work towards them becoming mutually complimentary and fully comprehensive.</p> <p>The governance of the VVAP plan (which contains the actions in the associated plans and strategies as highlighted above) sits with Community Safety.</p> <p>The Violence Reduction Unit (VRU) has commended The London Borough of Bromley on its work in developing the Violence & Vulnerability Action Plan (VVAP), formally the Violence Reduction Action Plan (VRAP). The Serious Youth Crime & Gangs (SYVG) officer will be coordinating the partner's action update later in the year. The MOPAC VRU provided a detailed review document acknowledging good strategic and operational practice and collaborative working.</p> <p>Below are the top 3 positive points acknowledged by the VRU.</p> <ul style="list-style-type: none"> • The VRAP is a comprehensive and improved plan from the previous year and acknowledges the collaborative working across the partnership. • There is a full range of necessary actions and extra local actions regarding governance, analysis, and enforcement, reducing the supply of weapons, safeguarding and education. • The 6-monthly updates are evidence of a regular review of partnership activity to ensure the plan drives delivery rather than be simply a basic annual process. <p>The VRU have also recommended improvements for the partnership's consideration. Further discussions will occur with the SYVG officer and relevant partners to include as many of those recommendations as possible.</p> <p>Q1 Update – Latest VVAP update is due at the end of Q2 and partners have almost completed it.</p> <p>Q2 Update – The updated VVAP will shortly be shared with relevant partners.</p> <p>Q3 Update – The updated VVAP is almost complete and is due imminently.</p> <p>Gang Violence Matrix Update</p> <p>Currently the London borough of Bromley has 7 active gang nominals on the Matrix with 1 in custody. Gang nominal's activities are managed across the BCU by the Police Gangs team, Probation Service, Youth Justice Service and Community Safety. Gang intelligence is shared daily with the SYVG officer and partners.</p> <p>Q1 Update – No change to above</p> <p>Q2 Update – No significant change to the above. A piece of work is being carried out analysing the relationship networks of known individuals to illuminate links between groups and individuals that have hitherto not been obvious.</p>	<p>Achieved and continues</p>
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Q3 update – There is currently only 1 person from LBB on the Matrix following a review of individuals on it. The others are currently incarcerated or have been removed from the Matrix.

5. CCTV

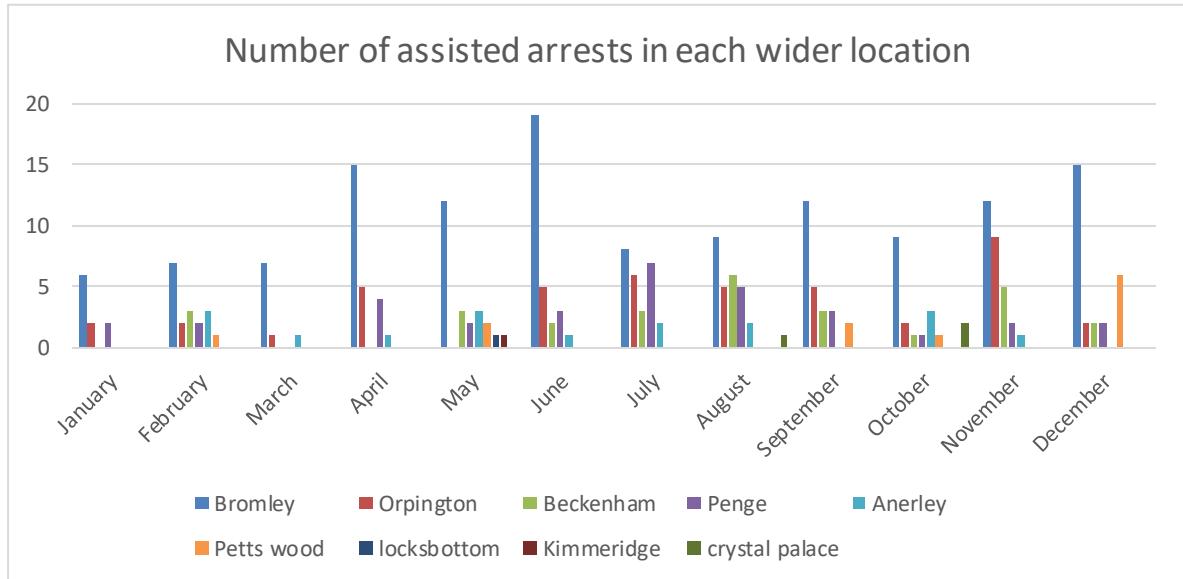
Through ensuring the effective use of public space CCTV on targeted areas as determined by intelligence, and the investment in new deployable cameras.

Bromley Council runs a CCTV control room that monitors 200 fixed cameras that cover town centre and key locations across the borough 24 hours a day, 7 days a week. To monitor emerging crime and ASB & fly tipping hotspots the Council has several mobile CCTV cameras that we use for short periods of time (usually installed for 3 – 6 months).

Between January 2021 and December 2021, the CCTV control room assisted the Police in 264 incidents which resulted in arrests. In many cases these arrests were due to CCTV Operators spotting suspicious behaviour by individuals and remotely following them until the Police arrived on site.

All our CCTV operators are fully trained, and most have worked at Bromley for several years. They are very familiar with the borough's town centres and have valuable local knowledge.

Last year we saw the completion of the CCTV upgrade replacing the last of the analogue cameras with IP digital systems.



Q1 Update

During the first quarter of this year the local authority maintained a 24/7 CCTV monitoring of public spaces in the borough. There were 3,108 incidents reported by CCTV operators where support was provided to local police in the prevention and detection of crime. 107 evidence packs were prepared for Police, local authority, parking, and external information requests.

Q2 Update

Achieved and ongoing

During the first quarter of this year the local authority maintained 24/7 CCTV monitoring of public spaces in the borough. There were 2,017 incidents reported by CCTV operators where support was provided to local police in the prevention and detection of crime. 83 evidence packs were prepared for Police, local authority, parking contractor and external requests for footage. CCTV operators supported police in making 75 arrests in town centres in this period. Police also praised the assistance of a CCTV Operator who reviewed a significant amount of CCTV footage of a serious incident, clarifying the timings and providing an evidence pack enabling police to focus on other aspects of the investigation. The operator in question has rightly been thanked for his dedication and willingness to support police in detecting and solving a serious crime.

Q3 Update – In October and November 2022 the CCTV control room recorded 1,284 incidents and provided police and other agencies with 51 evidence packs to support investigations of crime.

6. Reduce risk of financial abuse of the elderly or vulnerable through targeted communications campaigns and enforcement

During the past year, Trading Standards has focussed on the continued success of the ‘Trading Standards Alert!’, an early warning system which alerts residents and partners of scams and doorstep crime in the Bromley borough as it happens. The number of recipients of the alerts has increased since its launch during the pandemic and boasts a circulation list of over **650** with an estimated forward circulation of **47,000**.

The team continue to disrupt rogue traders and there were 26 rapid response interventions where officers attended the homes of residents immediately following a call for assistance. One response resulted in a saving of **£12,000** for an elderly couple who had been cold called by traders seeking to extract payment for unnecessary roof repairs. Another immediate response identified a saving of **£36,833**, and a further intervention saved a resident **£18,000**. Several individuals related to these incidents are under further investigation.

The work we are doing through early intervention and disruption, for example in providing call-blockers, and advising victims and families to prevent or stop victims from responding to scams, can be seen as an alternative to care in some cases, enabling the individual to continue to stay in their home. This can result in financial savings to the victim, family, and the Local Authority.

Locally we have data evidencing £2.5million of savings to residents because of Trading Standards interventions since 2006.

Using a new impacts and outcomes calculator, we can estimate that between 1st April 2021 and 31st March 2022 Trading Standards interventions created total financial savings of **£507,157. This includes estimated future financial savings of £292,738 and an estimated £158,078 health and quality of life savings for the public purse.**

This figure includes an estimated **£44,659** healthcare savings and health related quality of life savings because of the 5 call blocker units we installed, protecting particularly vulnerable residents from scam telesales.

Achieved
and ongoing

Q1 Update

During Q1 2022 Trading Standards received 233 enquiries for investigation. There were 76 cases in total relating to finance abuse, allegations of scams or doorstep crime – with a total consumer detriment of £505,804.50.

There were 30 reports of scams and doorstep crime received via the dedicated Rapid Response number and, of these, 7 warranted an immediate response. One case involved a call from a local bank concerned about a vulnerable customer who had attended the branch to withdraw £4,000 cash for roofing repairs following a cold call by traders who initially wanted £30 for gutter cleaning services. Intelligence held by the team suggested this trader would inflate the costs even further and officers attended the branch and the home address within minutes of the call. Four men were confronted at the address, and following our intervention made their excuses and left. Investigations are ongoing. The consumer had been given no paperwork and was in the dark as to the nature of the “urgent” roof repairs described by the men as requiring immediate attention.

Total financial savings from Trading Standards interventions in this quarter are estimated at £146,333 made up of:

- SCAMS – estimates future financial savings of £600 and estimated healthcare saving & health related quality of life saving of £324.
 - DOORSTEP CRIME - estimates future financial savings of £40,500 and estimated healthcare saving & health related quality of life saving of £21,870.
 - FRIENDS AGAINST SCAMS - estimates future financial savings from the FAS programme of £2,586 and estimated other savings from the FAS programme of £4,035.
 - Call Blockers – we installed 3 units this quarter, realising estimated financial savings of £49,622 and health & quality of life savings of £26,796 over the term of their installation
- .

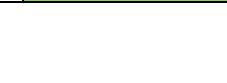
Q2 Update

During Q2 2022 Trading Standards received 248 enquiries for investigation. There were 60 cases in total relating to financial abuse – allegations of scams or doorstep crime – with total consumer detriment of £99,761.

34 reports of scams and doorstep crime were received via the dedicated Rapid Response number and, of these, 5 warranted an immediate response. One case involved a referral from the LBB Tree officers who were concerned about an elderly resident who was being charged nearly £4,000 for tree work. Officers attended and noted the female lived alone and was clearly vulnerable, however the address was just outside the border and sat within Greenwich. Given the vulnerability of the consumer, officers continued with the intervention, liaising with colleagues from Greenwich trading standards. They sought estimates from LBB contractors who valued the work at £1,000. A call to the trader resulted in a reduced fee resulting in a significant saving for the resident. A meeting with Greenwich took place the following day to ensure a full hand over of the incident and to ensure safeguarding concerns were shared.

Q3 Update – Between 1st October 2022 and 31st December 2022 Trading Standards officers delivered 9 awareness raising talks in the community to help empower vulnerable residents to protect themselves from scams and rogue traders. Around 250 attended these events.

The team circulated nine 'Trading Standards Alert!', an early warning system which alerts residents and partners of scams and doorstep crime in the Bromley borough as it happens. This included a special edition on the dangers of buying second hand electrical equipment and linked into safety messages from the LFB.																					
Trading Standards received 212 service requests of which 43 related to doorstep crime and scams, with a total consumer detriment of £1,204,326.																					
7. How do we know we are on Track?	Achieved																				
1) This theme is included as a substantive discussion item at the Safer Bromley Partnership Board in Quarter 1 of each business year																					
2) The Police provide a crime update at each Safer Bromley Partnership Board, and partners present an end of year update in Quarter 4 of each business year.	Achieved																				
3) Local data via the Metropolitan Police Service crime dashboard (updated monthly) will be monitored, and Community Safety will attend Tactical Tasking Coordination Group (TTCG) each month to provide input into tasking and analyse effectiveness of responses. This data is consistently monitored and Community Safety officers regularly attend the TTCG and other relevant groups and networks.	Achieved																				
8. Metrics for the 3 MOPAC sub-priorities that are: <ul style="list-style-type: none">• Non-domestic violence with injury• Residential burglary• ASB In addition to the above, data on the following has been included: <ul style="list-style-type: none">• Total Burglary• Theft of Motor Vehicles• Knife Crime Offences (links with Priority 3 – Keeping Young People Safe)• Domestic Abuse (links with Priority 2 – Violence Against Women and Girls)• Hate Crime (links with Priority 4 – Stand Together Against Hate Crime and Extremism)																					
<table border="1"><thead><tr><th>Category</th><th>Rolling Year Jan 21</th><th>Rolling Year Jan 22</th><th>% Difference between the Rolling Years</th><th>RAG Status</th></tr></thead><tbody><tr><td>Total Notifiable Offences</td><td>21,328</td><td>24,594</td><td>+14</td><td></td></tr><tr><td>Non-Domestic Violence with Injury</td><td>1280</td><td>1448</td><td>+14</td><td></td></tr><tr><td>Total Burglary</td><td>1452</td><td>1577</td><td>+8</td><td></td></tr></tbody></table>	Category	Rolling Year Jan 21	Rolling Year Jan 22	% Difference between the Rolling Years	RAG Status	Total Notifiable Offences	21,328	24,594	+14		Non-Domestic Violence with Injury	1280	1448	+14		Total Burglary	1452	1577	+8		
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Theft of Motor Vehicles	950	1056	+10		
Knife Crime Offences	215	189	-12%		
Sexual offences	496	606	+19		
Domestic Abuse Offences	2900	2697	-7		
Hate Crime	513	805	+44		
ASB Calls	13620	7267	-47		

The previous table demonstrates that there were percentage decreases for some areas of crime noticeably ASB and knife crime. However, others that are considered under the Safer Bromley Partnership Strategy, as well as the Violence & Vulnerability Action Plan, have seen increases as the UK has moved back to normal operations following post pandemic controls being lifted.

The largest increase has been recorded for reports of hate crime, and emerging evidence shows that the pandemic was associated with a national increase in hate crime reporting, particularly against Chinese and East Asian minorities. This pattern has continued post pandemic.

Knife crime figures cover knife crime related injury, robbery, and possession. In the rolling year to February 2022, Bromley had 189 Total Notifiable Offences (TNOs) for knife crime. This is a decrease on the previous 12 months by 12.5%, a real positive considering the overall London increase of 5.38%. This decrease means Bromley also ranks well among the other London boroughs, with a crime rate of 0.57 placing it as 3rd safest borough in London. TNOs were low from the beginning of 2021, through to May, but have since returned to a more consistent level per month.

Anti-Social Behaviour calls saw quite a significant spike in the months of the first lockdown, peaking in May 2020. This was largely down to new offences relating to breaches of Covid-19 protocols falling under this category. A total of 7,267 were ASB Calls in Bromley in 2021-22, compared to 13,620 in the same period for 2020-21. This represents an 46.7% decrease, significantly better than the overall London decrease of 40.1%. All London boroughs have seen a large decrease in overall ASB calls recorded. Very pleasingly, **the drop in ASB calls over the past 12 months, means that Bromley ranks 1st among all London boroughs for rate per 1000,**

with a rate of 20.26. ASB calls have seen a generally steady decline since the peak in May 2020 and dropped to their lowest for over 4 years in February 2022.

NDVWI

Specific Outcomes for Priority One – Safer Neighbourhoods

Total Non-Domestic Violence with Injury (NDVWI) offences within Bromley have increased by 14%

Covid-19 saw a suppression effect on many crime types. NDVWI is largely but not entirely associated with the night-time economy and street based criminal activity. As lockdown eased, the Police have monitored this rise and now have a better understanding of the impact of reopening of licensed premises, schools and other premises types has had on crime rates and types. That this is understood in communities and sending clear messages in advance of re-opening of the need for responsible management of these types of premises.

NDVWI is one of Bromley's two Local Volume Crime priorities. The rolling year to Feb 2022 saw an increase of 14.5% compared with the previous 12 months, Bromley's increase of 14.5% was somewhat lower than the overall London increase of 21.4%, and it ranked 6th among all boroughs in crime rate, with 4.37 notifiable offences per 1000, an improvement of 2 places from last year.

Residential Burglary

Total Burglary within Bromley has increased by 8%

Total Burglary, one of the local crime priorities, saw a slight percentage increase for 2021-22, rising by 8.8% (1452 to 1577) with the rate per 1000 increasing from 4.32 to 4.72. This crime rate puts Bromley 9th of all London boroughs for burglary with the increase of 8.8% being worse than London as a whole, which saw a 3.58% decrease in TNOs for Burglary.

Burglary cases saw a significant decrease in the borough following the start of the pandemic, and whilst the figures have seen a rise, they remain far lower than pre-pandemic levels where cases in the borough were regularly above 200 per month. The majority of these were residential, with 1,139 offences recorded, accounting for 72% of total offences, which is slightly lower than 20-21 (78%).

ASB

Total ASB Offences within Bromley have decreased 47%

The dramatic increases in ASB were largely associated with Covid-19 related reporting of breaches in new legislation associated with lockdowns. We have seen a significant decrease in ASB related calls post-pandemic which demonstrates the significant demand that period placed upon Policing resources – but which were able to meet that demand.

Notwithstanding the Covid-19 effects, South Area BCU and LBB are encountering issues with nuisance off road motor vehicle ASB involving pit bikes, scramblers and quads accessing public and some private land. Police have received numerous reports of bike "gatherings". The concern is that this may render the green spaces unattractive or unsafe to members of the public wishing to use them for other leisure activities. Although Police and partners see pockets of similar issues elsewhere throughout the borough, there is a high concentration of bikers at Hockendon (St Pauls Cray Ward) and Hoblingwell Wood Recreation Ground (St Pauls Cray Ward). Specific areas of concern include Mottingham, Hockendon and Hoblingwell Wood Recreational Ground.

Intelligence from officers previously having issued warnings to offenders, state the bikers concerned are not exclusively local, and that some travel to the area from as far afield as Maidstone and Swanley in Kent. Understandably, this is causing significant annoyance and frustration to residents that live within sight/earshot of the affected areas.

In response, Op Green Champion, now run by PS Farmer and PC Wakeford has been running since the start of 2022. As these vehicles used do not always display VRM plates and/or the face of the drivers are covered by wearing a crash helmet, identification of perpetrators can be problematic. Additionally, the sheer size and terrain of the area to be policed presents several challenges. As such, the Police will rely on the local community to report incidents and share names and addresses so that retrospective action can be taken against the perpetrators, rather than risk injury by trying to stop them whilst they are riding. Residents can submit their photos/intel of persons involved. The mailbox address for Op Green Champion is:

SNMailbox-.OpGreenChampion@met.police.uk

The Police are also looking at other options such as:

- Target hardening by working with landowners to prevent access
- Targeted patrols at specific areas and times
- Using drone technology to identify those responsible

Violence Against Women and Girls (VAWG) – Overall

The following categories all fall under the Violence against Women and Girls sub-heading of the Safer Bromley Strategy. Whilst not all the TNOs displayed in the statistics will have had female victims, these offences disproportionately have female victims.

Harassment

Harassment offences are those when looked at as a course of conduct are likely to cause fear, alarm, or distress where a course of conduct is not present, so for example sexual harassment would be recorded under sexual offences. For the rolling year to February 2022, there were 3,700 recorded harassment offences in Bromley, a crime rate per 1000 of 10.8. This was a slight increase from the previous 12 months, where offences totalled 3,413. This 8.4% increase, however, is lower than the 11% increase seen across London as a whole, and the crime rate ranks Bromley 7th among all London boroughs.

Rape

For the rolling year to February 2022, there were 212 TNOs of rape in Bromley, at a rate per 1000 of 0.63. This crime rate places Bromley 2nd best among all London Boroughs, with the London crime rate sitting at 1.03. However, this is a 34% increase on the previous 12 months, slightly higher than the overall London increase of 28%, although the lockdown months of 2020/21 did show lower than usual figures.



Other Sexual Offences	<p>Other sexual offences including indecent assault and unlawful (underage) sexual intercourse. This does not include rape, which is categorised on its own.</p> <p>For the rolling year to February 2022, there were 394 TNOs in Bromley, with a crime rate of 1.24 per 1000. In terms of crime rate, Bromley is the best out of all London Boroughs for this category. In contrast, the London average is 1.85.</p> <p>Bromley did see an increase in TNOs by 20%, although this was significantly lower than the overall London increase of 45%. TNOs stayed constant throughout the year, peaking at 40 in both May and November.</p>
Domestic Abuse	<p>Domestic abuse TNOs for the rolling year to February 2022 totalled 2697. This includes Violence with Injury and Homicide cases. This gives Bromley a rate per 1000 of 8.12 and ranks it as the second-best borough in London on this crime rate. TNOs in Bromley also pleasingly saw a 5.17% decrease on the 12 months prior, whilst London saw a 2.73% increase.</p>
VAWG – Partnership Performance	<p>VAWG</p> <p>The term ‘violence against women and girls’ refers to acts of violence or abuse that disproportionately affect women and girls. Crimes and behaviour covered by this term include rape and other sexual offences, domestic abuse, stalking, harmful practices (including female genital mutilation and forced marriage) as well as many others, including offences committed online.</p>

It is estimated that one in 5 women in the UK will experience sexual assault during her lifetime, while one in 4 will experience domestic abuse. In London, recorded domestic abuse cases have increased by 26 per cent in five years, and in 2020-21 alone, the Met recorded more than 19,000 allegations of sexual offences.

The MPS is taking many actions flowing from the recent **Metropolitan Police Service's VAWG Strategy & Action Plan**. Many of which are being implemented locally these include:

- **Ask for Angela** campaign, working with Safer Sounds and bars, clubs, and other night-time-economy venues. This builds on the comprehensive Welfare & Vulnerability Engagement (WAVE) training to frontline officers delivered in venues across London last summer.
- **Project Vigilant** to prevent sexual offences linked to the night-time economy and to tackle predatory offending. Working closely with community partners, we aim to make busy, night-time economy areas places offenders are afraid to operate.
- **Mayor's Women's Night Safety Charter** is part of City Hall's own Violence Against Women and Girls Strategy. By encouraging businesses to sign-up and do more to provide safe spaces and further prevent incidents and better protect women from violence.
- **Good Night Out Campaign** working with licensees and event organisers to enable them to respond better to female victims of violence.
- **Walk and Talk sessions** we will continue to deliver these sessions which are focused on preventing violence against women and girls on every BCU. This involves officers buddying with women from the community to walk streets routes, engage in conversations, make note of safety improvements, and hear of women's experiences, concerns, and reflections.
- The use of the **#StreetSafe tool** which allows members of the public to anonymously flag specific areas where they don't feel safe so that we can better respond to their concerns.

Q1 Update

LBB have recently appointed a Strategic VAWG lead. They are currently working their notice but should be with us for the next board meeting.

The StreetSafe Police officers passed through several reports/suggestions they had received for the Chislehurst area. These were entered onto the Fix my Street app and several have now been addressed.

Q2 Update

The Strategic VAWG lead will now move from Early Intervention to the Community Safety Team in November. This move has been delayed by audits and inspections. Community Safety officers continue to address ASB hotspot locations where there has been a recent emphasis on public open spaces and abandoned and derelict buildings.

The SNTs have now completed summer operations around the Night-Time Economy (NTE) and ASB issues. This quarter was proven a challenging period

where we saw resources abstracted to police Notting Hill Carnival, the Royal Funeral and a variety of other sporting events and protests.

These incidents had limited impact upon Policing in Bromley but were sources of significant abstraction. That said, we have seen additional patrols and activity in Bromley Town Centre and Beckenham to tackle issues within the NTE. This has included engagement with licensed premises. We have also started to implement the Ask for Angela scheme.

Regarding ASB, we have used our legal powers under the Anti-Social Behaviour legislation, including the use of dispersal zones (primarily in Bromley Town Centre), and Closure Orders (in Penge) and where tenants have subsequently been evicted.

SNT teams are now into the Autumn Nights period as we approach Halloween and Bonfire Night. Officers are tasked on shifts across the day with activities ranging from arrest enquiries for the highest harm offenders identified, weapons sweeps, targeted patrols in reported ASB hotspot areas, and tasked patrols covering the NTE in Bromley and Beckenham. This tasking will continue until its climax on 5th November.

Q3 Update

The SNTs have now completed Winter operations around the Night-Time Economy (NTE) and ASB issues covering the Christmas and New Year period. This has been a challenging time due to significant resourcing issues across Frontline Policing in the MPS. This has seen staff abstractions to support core policing functions of answering 999 calls.

The football World Cup event, Christmas and New Year saw busy period but no significant issues.

We continue the use of our legal powers under the Anti-Social Behaviour legislation, including the use of dispersal zones (primarily in Bromley Town Centre), and Closure Orders. The use of such legal framework to tackle ASB will continue.

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Priority 2 – Violence Against Women and Girls

22/23 Quarter 3 - Update

Partners – Early Intervention & DA Lead

Priority 2

This priority looks at protecting women and girls from violence. We support Mayor's Office for Policing & Crime in their stance of taking a zero-tolerance approach wherever this violence and abuse takes place, with meaningful support for victims and survivors, and significant consequences for perpetrators. The services commissioned by Bromley will support victims and survivors whatever their gender. The Metropolitan Police Service has made tackling domestic abuse a high priority and has a dedicated unit within the Borough Command Unit. They will investigate all instances of domestic abuse, even in cases where a victim has not reported it themselves. There are key interrelationships between this priority and our other priorities.

Objectives

To reduce violence against women and girls, change the culture that allows this to happen, and empower them to take control, in doing so we will:

- Better protect women and girls
- Improve support for those affected
- Target offenders

Colleagues are asked to note the change of language to domestic abuse in line with the Domestic Abuse Act 2021. The word violence, and all reference to gender have been removed. When the strategy and priorities are formally reviewed, this will need to be updated.

Commitments within the SBPS	Rag Status
<p>1. Provide strategic direction</p> <p>Refreshing the Violence Against Women & Girls (VAWG) 2016- 2019 Strategy</p> <p>“Refreshing the Violence Against Women & Girls (VAWG) Strategy. A new strategy has been written, approved, and published. The new strategy is titled ‘<i>An intergenerational Domestic Abuse Strategy for 2021-2024 Making Domestic Abuse Everyone’s Business</i>’”</p>  <p>The strategy was circulated for comment to relevant partners via the members of the Domestic Abuse (DA) Operational Forum, DA Strategic Board, Safer Bromley Partnership, BSCP, BSAB, and the Health and Wellbeing Board. Partners were invited</p>	Achieved

to demonstrate their commitment to prioritise and support the drive to make DA everyone's responsibility (p.58) and to provide electronic signatures by 30 April 2021

In line with the Domestic Abuse Act 2021, the original Strategy has been amended and the word violence and all reference to single gender-based abuse, have been removed.

Signatures to the commitment were received from several partners and added to the strategy. The strategy has been published on the BSCP, BSAB and LBB website. The commitment is at p.58-59.

The Strategy outlines the priorities that Bromley and partners are committed to support and achieve during the life cycle of the current document. We have identified and agreed the following five priorities as detailed on page 50.

1. We will promote the message that tackling domestic abuse is everyone's and every agency's responsibility
2. We will commission effective service to support victims of domestic abuse
3. We will challenge perpetrators and explore interventions that measure the changes in their behaviour
4. We will increase and develop our existing training offer on domestic abuse to improve responses to victims and survivors, and their families
5. We will introduce Domestic Abuse Ambassadors to support staff in the workplace.

A draft Action Plan has been drawn up covering the 'how we will do this' within each of the five priorities: pages 51-55. The Action Plan has been sent to colleagues in both the Domestic Abuse Operational Forum and Strategic Board for comment, suggestion and contribution in the meetings on 23 September and 14 October respectively. Likewise, a copy of the draft Action Plan was shared with the SBPB members for comment, suggestion, and contributions.

All comments received were incorporated.

The DA Strategy action plan is a standing item on the agendas at the Domestic Abuse Operational Forum and Strategic Board meetings for the duration of the lifecycle of the Strategy.

The Strategy has been added to all the existing DA training materials / courses so that all staff across the wider workforce are aware of the document, where to find it, and the local services commissioned by Bromley. In addition to this, the Strategy was featured in the DA Newsletter (Edition 4 – April 2021).

This is now in circulation, is available digitally via the London Borough of Bromley website, the Bromley Safeguarding Adults Board website, the Bromley Safeguarding Children's Partnership website and the Bromley Parenting Hub website, as well as in hardcopy upon request.

This objective, to refresh the Violence Against Women & Girls (VAWG) 2016-2019 Strategy is complete.

Update the Domestic Homicide Review protocol.

DHR protocol

- Completed by Rob Vale (Public Protection) and circulated to relevant parties.
- It is now an operational document.

Achieved

2. Communicate

Develop a communication plan to increase awareness of the services Violence Against Women & Girls provide.

- DA Strategic Lead Officer publishes a regular newsletter which is shared across the wider workforce... with thanks to colleagues who manage the SBP, HWB, BSCP, and BSCB meetings and membership. Five have been published, and the sixth will be published shortly, delayed by maternity leave.
- Credit-card sized information cards have been developed and so far, two runs of 10,000 cards have been printed with more than 10,000 distributed to partner agencies across the wider Bromley workforce. The cards include contact details for both local and national organisations who offer support in relation to domestic abuse. These are designed to be given to individuals at risk of becoming or already victims or survivors of DVA. Additional cards will, if required, be produced in 2022/23. We currently have 5,000 available. Contact the DA Strategic Lead Officer, Rachel.pankhurst@bromley.gov.uk



- DA Strategic Lead Officer developed and circulated a directory of support interventions for DA victim survivors, and perpetrators. This was shared via BSCP, BSAB, SBP, and HBW to reach the wider workforce. This document was due to be reviewed in January 2021 but due to maternity leave and recruitment of someone to cover this period, the update was deferred and will be on the agenda for July's Operational Forum with target to complete by July 2022.
- BCWA social media presence has grown and EIFS has been promoting BCWA (Bromley's provider) via their Social Media feeds too.
- Bromley Local Authority have updated their DA information on the council's corporate site, but there is more to do on this as there has been a review of the website and this has delayed updates. This is planned for Summer 2022.
- DA Strategic Lead Officer had been actively delivering awareness presentations and training to partner agencies requesting this service. To date; Bromley Healthcare Children's services. Booked in for this quarter; Oxleas Adults Services, Oxleas CAMHS, Bromley Healthcare Adults services, and GP network. During COVID requests for this service reduced dramatically as partners learnt to adapt their service delivery.
- Strategic Board and Operational Forum are now both active with good level of representation across partner agencies. Membership has been reviewed and updated with new partners including Probation, Job Centre Plus and Youth Justice Service.
- Developing a wider DA communications strategy is part of our work plan. This is now live and called the Bromley Parenting Hub. The ambition is to create a satellite, bespoke for domestic abuse information, advice, support and signposting with its own hyperlink. We have taken care to distinguish between DA and reducing parental conflict to ensure anyone who suspects or identifies DA seeks the right specialist support.

<ul style="list-style-type: none"> We continue to work closely with L&D, BSAB and BSCP to provide a core training package for all professionals working within the wider workforce and in addition to this we have commissioned targeted training on co-ercive control and the impact of domestic abuse on children, MARAC panel training and MARAC awareness for the wider workforce. 	
<p>Tackle under-reporting through media engagement, partnership and information sharing between professionals (particularly health), and engaging the third sector including campaign groups</p> <ul style="list-style-type: none"> DA Forum has increased communication and awareness amongst agencies. Regular meetings are taking place between the DA Strategic Lead Officer, partner agencies and community and voluntary sector organisations. The SBPB Co-Chair, CI Knight, launched an app to support the reporting of VAWG incidents called 'Safe & the City' 	Achieved
<h3>3. Take an Intelligence Led Approach</h3> <p>Improving the response to victims by developing mechanisms to capture data in addition to that provided by the Police</p> <ul style="list-style-type: none"> DA Strategic Lead Officer was meeting regularly with colleagues in the MET BCU however during COVID this has been a challenge. The DA Strategic Lead Officer is reaching out to colleagues in the MET to re-engage. This has impacted on the effective sharing of timely data from the MET. We would like this to recommence, including the comparison of data across the BCU. During COVID we have been asking partners to share their DA data. Requesting data from partners on the prevalence of DVA within families they are supporting has identified a gap and lack of consistency in way that data is captured and reported. Several services e.g. EIFS, Housing, CSC, CCG and BCWA are sharing data in relation to domestic abuse in their respective service areas. Work was undertaken with the Operational Forum and a new data sheet agreed however, many partners have now decided that this is not data they wish to share in the format previously agreed. The DA Strategic Lead Officer is looking again at how other London boroughs have achieved a successful model for sharing their data. This will include analysing the language used to provide a shared language and enable comparison. Partners who are not currently sharing their data in relation to DA are encouraged to do so. Whatever data you are able to share would be welcome. All that is asked is that it comes with an explanation, permission to incorporate and publish, and that regular, ideally monthly (but quarterly broken down by month would also be extremely valuable) updates can be sustained. This will add value and improve our understanding of issues, prevalence, mapping of victims and perpetrators across all levels including where they have not yet engaged with the police/judicial process. Once developed the datasheet will be shared at the DA Strategic Board, the DA Operational Forum and other relevant Boards e.g. SBPB. Our ambition is to create this in a cloud-based environment allowing agencies to 'submit and click' e.g., Survey Monkey. 	In progress

<p>Enable accurate mapping of the prevalence of Violence Against Women & Girls and implement appropriate responses and services where needed.</p> <ul style="list-style-type: none"> MARAC data will be used to add intelligence to the data that is held. This will link to the DAPP data (Domestic Abuse Perpetrator Panel) delivered under the DRIVE programme. The challenge in relation to actively using the MARAC data is that there is no current MARAC coordinator post. This has been raised as an issue via the DA Forum and DA Strategic Board. Options are being actively explored in terms of how this gap can be managed at Director level. 	Not yet progressed
<p>4. Protect High Risk Victims</p> <p>Support victims through an effective and robust Multi Agency Risk Assessment Conference (MARAC),</p> <p>MARAC</p> <p>The MARAC Steering Group is currently working to:</p> <ul style="list-style-type: none"> Review the recommendations made by SafeLives in the MARAC Review that was conducted in September 2020. Membership of the Steering Group has been reviewed and agreed and will be monitored regularly, to ensure consistent representation of core agencies. The action plan has been shared at the DA Strategic Board, work has commenced, and an update will be shared in the SBP Quarter 2 2022/2023 meeting. 	In progress
<p>Implementing any learning points from Domestic Homicide Reviews,</p> <p>DHR</p> <ul style="list-style-type: none"> There are currently three DHRs in progress. Of these three, two are now at the Action Plan stage. The Action Plans have been submitted to the Home Office. One of the Action Plans is live and one is now completed. For the completed one, Agencies are reporting that they have implemented required changes to their procedures. Once the Home Office has ratified the DHR and approved the level of information that can be shared, this will be shared via BSCB, BSCP, SBP, and HWB in order to reach the wider workforce in line with Bromley's DHR Protocol. <p>Q1 Update – not requested Q2 Update – DHRs continue, learning is disseminated via Home Office Q3 Update – DHRs continue, learning and best practice is disseminated. There are currently three live DVHRs in progress and a fourth is with the Home Office Quality panel awaiting review and sign off.</p>	Achieved Progress Made but more to do moving into 2022-23
<p>Ensure that all local domestic abuse services are aware of the relevant support services that are available, including: The One Stop Shop, Outreach Support and the DRIVE programme.</p> <p>Bromley and Croydon Women's Aid</p> <ul style="list-style-type: none"> BCWA continue to provide services both face to face and online, which is meeting the needs of victim/survivors. Details of these services are being promoted via BCWA and EIFS social media and their websites. 	Green Good progress made but more to do moving into 2022/2023

- BCWA continued to deliver the OSS virtually during this financial year. Considering the change in delivering the OSS from drop-in service to virtual, the number of service users, calling to receive advice and guidance through the BCWA support line, has not reduced. Callers to BCWA are now being captured in our data records as OSS enquiries regardless of the day/time that they initiate their contact by the commissioner's request.
- The co-location of the IDVA into the MASH Team has had a significant impact on the number of referrals that were made by Children Social Care in Q3 of 2021/2022.
- The DA Strategic Lead has also increased engagement with agencies and continues to deliver presentations in relation to domestic abuse and the services available in the borough and this is available to any partner agency by contacting the DA Strategic Lead Officer.

Perpetrators' Intervention

- The DRIVE perpetrator programme has been operational in Bromley for one year and funding has been extended for this to run until March 2023.
- The DRIVE data shows that there has been a reduction in reoffending behaviour with significant risk reduction in all Drive cases, particularly where there has been contact between the case manager and the perpetrator. We are waiting on finalised data for the financial year (2021/22) which was most recently requested on 25th April 2022.
- A plan to identify funding will need to be discussed to look at how to sustain perpetrator interventions in Bromley after March 2023. MOPAC will be convening a task and finish group to develop and deliver a dedicated action plan on sustainability of the programme beyond 22/23. This has been delayed due to DRIVE not yet having provided any data in relation to impact and outcomes and once this has been received, we will be in a better position to push this forward.

Sanctuary Scheme

- Calvin Pearson and Lydia Lewinson are leading on this project. The service is now live - contact calvin.pearson@bromley.gov.uk.
- Request made for data in relation to the use of this scheme. Update not received in time to be included in this paper but the Sanctuary Scheme is on the agenda for the Domestic Abuse Strategic Board. Data will be requested for this report moving forward.

Achieved

5. Make use of Legislation

Ensure that perpetrators of violence against women and girls are held accountable according to the law and are provided with assistance to change their abusive behaviour in order to prevent them from causing harm or violence to their current, past or future partners.

- The Domestic Abuse Act 2021 introduced new changes in law to make perpetrators more accountable for their behaviour. We produced and circulated a paper on the changes implemented by the DA Act 2021 for use by professionals working across the London Borough of Bromley regardless of their agency. This paper can be found on both the BSAB and BSCP.
- The London Borough of Bromley received new duties funding to support the implementation of the new duties in the DA Act 2021 and this is being led by colleagues in the housing department; Lydia Lewinson.

Achieved

<ul style="list-style-type: none"> The DRIVE programme aims to work with agencies such as the Police and Probation to address and change the behaviour of high-risk perpetrators. Data has been requested from RISE who have been commissioned to deliver DRIVE across our BCU by MOPAC. Additional services that can provide assistance to perpetrators of abuse in Bromley include the 'Fathers to Fathers' programme run by HomeStart, and 'Respect'. This is in addition to programmes run by partner agencies e.g., our Youth Justice Service run Healthy Relationship groups, Welcare deliver Healthy Relationship sessions in some schools as part of the PHSE syllabus too. 	
<p>6. Work in Partnership</p> <p>With Children's Social Care and Children's Early Intervention Teams to provide support, advocacy and deliver age-appropriate work in a range of educational, youth and community settings.</p> <ul style="list-style-type: none"> EIFS sits with Children's Social Care. EIFS is providing child focused support sessions for children who have witnessed DA against their primary female carer, an evidence based licenced programme overseen by the charitable organisation 'AVA' (Against Violence and Abuse). This programme has been renamed 'CODA' which stands for Children Overcoming Domestic Abuse. The CODA programme has been running for over 5 years. Schools work in partnership to enable the children to attend these sessions. Other agencies are also working with our children and young people in schools and other settings. We have not yet managed to persuade those agencies to share their data and success stories. This is a continuing piece of work for the DA Strategic Lead. Independent Domestic Violence Advisors ('IDVA') from BCWA are sharing the co-location within the MASH Team and continue to work closely with other agencies in Bromley. In addition to the IDVAs within BCWA, there is an IDVA based at the PRUH employed through Victim Support pan-London MOPAC funding, and an addition resource via the IRIS programme (CCG) which supports health professionals through access to the IDVA-E. Anthony Powell – Community Safety Officer/Serious Youth Crime and Gangs Lead was the chair of the DA Operational Forum for 2021/2022 and this will change to Paul O'Brien – Consultant Lead Practitioner within Adult Social Care for 2022/2023, with Anthony taking the role of Vice Chair. 	Achieved There is a lot going on but always more to do and this will be the case 2022-23
<p>Work in Partnership</p> <p>SEL CCG Domestic Abuse (DA) Update.</p> <ul style="list-style-type: none"> Domestic Abuse Health Forum introduced. The primary aim is to form part of a wider system approach and response from health to DA in Bromley. DA Health forum provide an update to the DA Operational Forum. SEL CCG had recruited to DA lead post in health but this person has moved on and so now looking to recruit a new person. SEL CCG (Bromley) has recommissioned Victim Support to deliver the IRIS ("Identification and Referral to Improve Safety) programme increasing the number of GP practices who are IRIS accredited. There are currently 41 IRIS accredited GP Practices across the borough – update given by SELCCG in appendix one. 	Achieved There is a lot going on but always more to do and this will be progressed 2022-23

<ul style="list-style-type: none"> Ask for ANI (Action Needed Immediately) codeword scheme to enable victims of DA to access immediate help from the police, or other support services, from the safety of their local pharmacy. Currently there are 12 pharmacies signed up to the scheme, covering a wide proportion of the borough. In addition, some pharmacies will also be running the 'Safe Spaces' scheme which enables victims of DA to use the pharmacy consultation room to access information on domestic abuse support services. 	
<p>7. How we will know we are on track</p> <p>This theme will be included as a substantive discussion item at the Safer Bromley Partnership Board in Quarter 2, whereby Violence Against Women & Girls, Police and associated Partners will provide an update.</p> <p>An update was produced for Quarter 2 and quarter 4 in line with the agreed programme See Appendix 1.</p>	Achieved
<p>The Domestic Violence and Violence Against Women & Girls subgroup will lead on the effective monitoring and scrutiny of partner agencies in their service delivery, present findings within that setting, and report exceptions to the Safer Bromley Partnership Board if they occur.</p> <ul style="list-style-type: none"> The DA Strategic Board and DA Operational Forum are now taking place three times a year. A regular agenda item has been introduced at the DA Operational Forum where agencies are required to respond to a set topic/issue. This improves communication between agencies and provides an overview of what is happening in relation to domestic abuse at a local level. There has been a lot of work undertaken to produce a universal DA reporting tool but unfortunately this is still not operational. It is on the agenda for both the DA Operational forum and DA Strategic Board with the ambition to achieve this in 2022. Requests for updates are sent from all partners in the preparation of this report and where received are included in this report – see below. Our ambition is that all agencies represented at the Operational Forum and/or the DASB will submit a short statement for inclusion however only 7 agencies chose to submit an update to be included in this report. 	In process
<p>Update the Violence Against Women & Girls Strategy and the Domestic Homicide Review Protocol by August 2020.</p> <ul style="list-style-type: none"> DA VAWG Strategy - Completed DHR Protocol – Completed 	Achieved
<p>8. Impact of COVID 19 on Business as Usual</p> <ul style="list-style-type: none"> All services have continued but are offering a mixture of both online and face to face e.g. One Stop Shop, Freedom, CODA and DRIVE. IDVAs are able to meet with victims/survivors e.g., to support in Court, but the majority of BCWA's support has continued to be virtual e.g., Zoom, WhatsApp, Facetime, etc. 	

- Support Programme – The freedom programme is being delivered online via zoom and this has been reported as being well received by victim survivors and the service is starting to resume face to face sessions along with telephone support. There has been a small reduction in the number of victim survivors referred in for support groups.
- The co-location of the IDVA into the MASH Team has had a significant impact on the number of referrals that were made by Children Social Care in Q3 of 2021/2022.
- The data shows that 855 referrals into BCWA met the criteria for the IDVA service and were supported in year 2021/22. This is a reduction from the previous year's total of 919.
- We have directed BCWA to change the way they record data in relation to OSS usage and this is now showing more realistic data about the level of support they are giving via the virtual OSS. The data now shows 500 uses of the virtual OSS under the new recording method during the last 12 months, whereas in the previous year under the old recording method there were 358.

9. General Annual Update of achievements

- Publication of the new DA/VAWG Strategy covering 2021 – 2024.
- DA/VAWG Strategic Board and DA Operational Forum successfully set up and running three times a year.
- Increased awareness and commitment from partner agencies in relation to domestic abuse.
- Review of Bromley's MARAC undertaken, Action Plan moving forward led by MARAC steering group.
- The DRIVE perpetrator programme has been operational in Bromley for one year and funding has been extended for this to run until March 2023.

Appendix 1

Please note:

This appendix contains updates from agencies who are represented in either the DA Operational Forum and/or the DA Strategic Board. These updates are in relation to domestic abuse and not the wider work of each of these agencies (unless the agency is a domestic abuse specialist service). The report is a short statement outlining how they have contributed to the domestic abuse agenda in Bromley over the past year. Our thanks to all the agencies who contributed to this report; it provides a helpful snapshot of the wider picture and the fight against domestic abuse and the support being provided.

South East London Clinical Commissioning Group (SEL CCG Bromley) **Update - 2021-2022**

Ensuring that health representation is effective and visible through the Domestic Abuse (DA) victim/survivor journey by:

- Ensuring Multi Agency Risk Assessment Conference (MARAC) information sharing protocols were in place for Health providers.
- Developing a Health attendees MARAC induction guide.
- Recommissioning the Identification and Referral to Improve safety (IRIS) programme across Bromley. The Identification and Referral to Improve Safety (IRIS) programme. IRIS is a general practice based DA training, support, and referral programme. Core areas include ongoing training and support for the practice, clinical team and administrative staff, including an enhanced referral pathway to specialist domestic violence services for patients experiencing DA. There are currently 41 practices IRIS accredited across Bromley.

- Development of a Domestic Abuse Health Forum, chaired by the Adult safeguarding Manager, supported by the Designated Nurse for CYP. The primary aim is to form part of a wider system approach and response from health to DA in Bromley. The introduction of the forum has received enthusiastic support from health partners and the London Borough of Bromley (LBB) DA strategic Lead.
- SEL CCG have developed a Domestic Abuse policy for staff.
- SEL CCG (Bromley) representation is provided at the Domestic Abuse Strategic and Operational boards.

Metropolitan Police Service BCU
Update - 2021-2022

In February we launched our violence against women and girls (VAWG) action plan. This plan brings together all of our work to prevent violence against women and girls in public spaces, domestic settings and online, to target perpetrators.

Protecting people from violence is our top priority. The crimes that disproportionately affect women and girls, such as domestic abuse and sexual violence have devastating consequences.

The plan has four themes:

1. Protecting women and girls in public spaces, at home and online
2. Working with our partners and with women to improve prevention and victim care
3. Bringing offenders to justice and improving criminal justice outcomes for victims
4. Improving Met culture and professional standards

Our key objectives

We want to:

- increase the number of perpetrators brought to justice for violence against women and girls.
- improve processes and victim care across the criminal justice system to reduce the number of cases failing
- reduce repeat victimisation of women and girls
- increase women's confidence in the police to improve the reporting of crimes which disproportionately affect women and girls within London
- see an increase in reporting to police, but a decrease in women being abused, i.e., the proportion of women experiencing these crimes in each year (measured through reporting in the Crime Survey in England and Wales)

The MPS continues to support current initiatives such as OP Vigilant (to tackle predatory offending around the night-time economy) and Ask for Angela. We are also increasing the impact of key units, such as the new Town Centre Teams and specialist units including our Predatory Offender Units, which have now arrested over 2,100 offenders across the capital, half of which were for domestic abuse offences.

At a local level, DI Tom Revell and DI Duncan Mather continue to drive local performance.

In SN

- 83% of Domestic Abuse suspects are arrested in first 24hrs
- Specific stalking prevention weeks with initiatives targeting stalking and harassment.
- Increased use of tools such as Domestic Violence Prevention Orders to safeguard victims (SN has currently second highest total in London)
- Increase in Sanctioned Detection rate
- SN BCU are also the MPS leader in MARAC referrals
- SN continue to support the DRIVE project aimed at dealing with perpetrators of Domestic Abuse which has been hugely successful

Bromley and Croydon Women's Aid (BCWA)
Update - 2021-2022

In 2021/22 Bromley & Croydon Women's Aid have continued the vital work that they are doing within Bromley (and Croydon) to support survivors of domestic abuse. BCWA currently manages six refuges with 37 bedspaces commissioned by the London Borough of Bromley. Additional 12 Croydon and 5 Bromley-based bedspaces are run by BCWA without statutory funding (2 owned and 1 leased).

As well as refuge spaces & support, BCWA have a range of services, some of which are specialist and address barriers that survivors of domestic abuse face. These are:

- Advocacy (IDSVA service – high-risk clients)
- One Stop Shop – Facilitating & providing a free & confidential drop-in service for victims.
- Community Outreach – Providing emotional & practical support to victims within Bromley.
- Outreach Support with no Recourse to Public Funds/EEA Nationals - BCWA typically houses around 15% of London's NRPF service-users despite only having 5% of London's refuge spaces.
- Specialist No Recourse Support in refuge and specialist complex needs support in refuge, funded by the NLCF.
- Safebeds Scheme' is a service that allows Social Services Departments to place women quickly in our independent refuges, including those who have no recourse to public funds ("NRPF"). Safebeds provides temporary, safe accommodation for women and children who would ordinarily not qualify for support and would otherwise be placed in expensive, unsuitable, unsafe bed and breakfast accommodation without specialist support.
- Specialist child support in refuge and in the community for children affected by domestic abuse funded by BBC Children in Need
- Young People's Outreach Support, both in 1:1 and group settings and provided awareness sessions on DVA in assemblies at Secondary schools funded by the National Lottery Community Fund (NLCF).
- Awareness raising/support groups in primary schools about healthy relationships.
- Never Too Late (innovation fund)– a new locally funded project for women aged 50 and over in the Bromley area. BCWA provides regular support groups for this vulnerable age group which is offers both peer support and a reduction in isolation.
- Japanese outreach service - A specialist Outreach Service for Japanese-speaking clients, funded by Japan's Ministry of Foreign Affairs
- In-house counselling service – BCWA recognised the need for survivors of domestic abuse needing to access an immediate therapeutic service and have launched a pilot project funded by Barclays.

BCWA became a registered housing provider in August 2021. This registration will provide us with increased stability and opportunities to develop our accommodation services.

BCWA are in the final stages of securing an investment to purchase a number of dispersed supported move on accommodation self-contained units for women & children moving on from refuge for up to 2 years. BCWA will be able to assist larger families, transgender clients, people with disabilities and/or those needing specialist provision or longer-term recovery with these units.

Bromley Safeguarding Adults Board (BSAB)

Update 2021/22

Tackling domestic abuse remains a priority for the Bromley Safeguarding Adults Board (BSAB) and as a partnership the following was achieved in addressing this area of abuse.

The BSAB:

- Published the Board's Domestic Abuse Policy, which was written in consultation with key domestic abuse strategic leads
- Supported with the implementation of the boroughwide Intergenerational Domestic Violence and Abuse Strategy for 2021 to 2024
- Supported the implementation of the Drive Perpetrator Panel to disrupt abuse and reduce reoffending amongst high risk and high harm perpetrators of domestic abuse
- Continued to develop the dedicated webpage for domestic abuse on the BSAB website
- Promoted the availability of a pocket size printed card for victims and survivors of domestic abuse to discreetly keep with them should they need to access support
- Produced a poster in easy-read format raising awareness of domestic abuse
- Raised awareness of the local Multi Agency Risk Assessment Conference (MARAC)
- Delivered multiple training for professionals that addresses Domestic Abuse and Coercive Control

- Ran a session on Domestic Abuse and IDVA service during the National Safeguarding Adults Awareness week
- Promoted an online webinar on Working with Male Victims of Domestic Abuse delivered by Respect
- Raised awareness of national initiatives to support victims of domestic abuse, such as the Ask for Ani domestic abuse codeword scheme, Enough, Safe Spaces, Men's Advice Line and the Hollie Guard digital app
- Raised awareness of national publications such as The Domestic Abuse Act 2021

Victim Support **Update 2021/22**

The London Victims and Witness Service (LVWS) from Victim Support is a service for London residents who are affected by or witness to crime, commissioned by the Mayor's Office for Policing and Crime (MOPAC).

The service brings together five key areas of support for victims and witnesses through a single integrated service:

- The service provides support to adult (18+) victims of crime
- Provides specialist support for victims and survivors of domestic abuse (aged 16+)
- Provides access to Restorative Justice
- Delivers pre-trial and outreach support for prosecution and defence witnesses
- Provides support for people affected by major crime incidents.

The LVWS are co-located at the Princess Royal Hospital in Bromley to help with the identification, and support, for both patients and staff members experiencing domestic abuse. Since the start of the LVWS in 2019, the service has received 233 referrals from Princess Royal. There was an increase of referrals in Quarter 4 of 2021-22 from Princess Royal - This is attributed to the recruitment of a new IDVA who has started working onsite.

LVWS also receive referrals for Bromley residents from a number of other sources, including the police and self-referrals. In Quarter 3 there were a total of 54 Bromley referrals, and this has significantly increased to 116 in Quarter 4.

LVWS opened its doors for external agencies to refer in to some of their programmes this year, including:

- Safer Space+ is a specialist support service for children and young people affected by domestic abuse. The project is open to children and young people between the ages of 5 to 18-years-old who reside or are educated within London.
- The iMatter group programme is for women aged 16 and over, who have experienced conflict and abuse. The programme is delivered online, by Zoom, across 10 weeks in groups of up to 12 women. It is suitable for those who are not high risk, and is available in the following languages: English, Welsh, Urdu, Bengali, Polish and Gujarati.

Community Safety – Serious Youth Crime & Gangs **Update 2021/22**

The Community Safety/ Serious Youth Crime & Gangs lead has chaired 2 DA Operational Forum's and will be the deputy chair for future forums.

The officer has established a contact with the DA support organisation DRIVE and is the SPOC for DA cases involving gang nominals.

Work has commenced on contextual safeguarding.

London Probation Services **Update 2021/22**

The London Probation Service are committed to reducing reoffending and protection of the public. It sets out to do this by ensuring that as a service we provide individuals on probation an opportunity to access rehabilitative services and interventions in addition to the proactive activities and partnership work we do to support communities be safer.

In order to achieve this vision, the London Probation Service sets out to ensure that safeguarding of individuals is embedded in our operational delivery plans and by the following:

- Evidence led interventions and toolkits that support Probation Practitioners to carry out their role effectively
- Evidence led interventions to engage people on probation service users, reflecting diversity and facilitate the desistance process
- Accredited programmes to support risk management
- A flexible and innovative supply chain via our Community Rehabilitative Services to facilitate the desistance process and provide effective interventions
- A partnership approach to support effective joint working and innovative practice
- A robust and informative custody approach to enable effective support for those leaving Custody

Diversity

The London Probation Service acknowledges that perpetrators and victims of domestic abuse can be Male, Female, Transgender and that domestic abuse occurs in both heterosexual and non-heteronormative relationships. Furthermore, it acknowledges that domestic abuse occurs in both an intimate partner setting and in interfamilial setting. The London Probation Service holds itself to a high standard in recognising diversity and providing the right support for the right service user.

Interventions

From a theoretical perspective the Probation Service has historically adopted the Duluth Model which places power and control at its core. The Domestic Abuse toolkit which takes this approach is still available for staff to use. Strengths based work has been underpinned by the Good Lives Model and the current delivery of the Accredited Programme Building Better Relationships (BBR) is modelled on this.

In order to successfully embed this approach, there has been a lot of work undertaken and adopting different approaches including, trauma informed practice with all staff, high quality one to one intervention work including use of toolkits by suitably trained and supported staff, accredited programmes and additional intervention programmes that meets the needs of those service users not suitable for Building Better Relationships Accredited Programme.

Risk Assessments

All cases will have an Oasys Risk Assessment and this assessment will include risk management plan details and sentence plan objectives will be agreed with the person on probation based on the overall assessment. Where there is evidence that the person on probation is or has been a domestic abuse perpetrator within an intimate partner setting a Spousal Assault Risk Assessment (SARA) will be completed. SARA provides a framework for risk assessment/management and decision making that is both systematic and practical.

Where a person on probation is identified as a perpetrator or victim of domestic abuse, practitioners are expected to raise a risk register on our Case Management systems with relevant risk information attached.

Third Party Information

The London Probation Service will work with its trusted partners to gather and share information in the process of effective and robust risk assessment and management. This included close working relationships with police and social services.

Where there is evidence of domestic abuse; current or historically in a case, practitioners are expected to complete intelligence checks with the police at the start of the period of supervision with and also throughout the period of supervision where there is a relevant change in circumstances or risk. Where these checks can be completed through the police Borough Intelligence Unit, it is preferred where there is a suitable contact and process in the relevant borough that the check is completed with the police Community Safety Unit and that an ongoing professional relationship is maintained depending on the local operational set-up of that Community Safety Unit.

Practitioners are expected to complete a safeguarding assessment for every service user that they work with. They are also expected to review this where there is a relevant change in circumstances. This will inform whether they need to do a known persons check with social services or a referral regarding a child or adult at risk. The London Probation Service are committed to working collaboratively with local authorities regarding safeguarding, particularly regarding MASH requests.

Multi Agency Risk Assessment Conference (MARAC)

The London Probation Service is primary member of MARAC and committed to attending each MARAC meeting. Each local MARAC meeting will have a Probation Officer assigned to it where they will be considered a Specific Point of Contact. Where it may not always be possible to attend MARAC meetings another Probation Officer is expected to attend, or information around the relevant cases to be sent to MARAC in advance of the meeting. Where London Probation Service is invited to MARAC steering groups, an operational manager or a representative will attend or provide information in advance if this is not possible.

Stalking Threat Assessment Centre (STAC)

The STAC offers a range of services from different agencies, all working together to combat and protect from the effects of stalking.

The Probation Team based at the STAC Clinic is involved in:-

- Information sharing re new allegations of stalking behaviour.
- PSR consults – completion of Screening Assessment for Stalking and Harassment (SASH) risk concern tool, advice re sentencing recommendations, information sharing.
- Complex case consultations – full review of case and hour consult offered with PO and Clinical Psychologist. Pre-release planning, victim safety planning, psychologically informed ways of working etc.
- MAPPA input where STAC can add value.
- One-to-one interventions.
- Victim advocacy via the Suzy Lamplugh Trust.
- Support / advice / risk management advice given to staff who are victims of stalking.
- Materials / training

Stakeholder Engagement

The London Probation Service is committed to working in partnership with a variety of stakeholders and will therefore ensure they are key member of boards including the Violence against Women and Girls (VAWG), Reducing Reoffending Boards (RRB), London Criminal Justice Board (LCJB) and others as they are created.

We currently have a Probation Practitioner representative on the Drive Programme in Bromley who engages to support the service users and sharing of information to help risk management and interventions.

Minerva/WIP

In London the following providers have been appointed for female services:

Women's Services in London co-commissioned with Mayor's Office for Police and Crime – Advance and Women in Prison

There are different elements to this service:

- Accommodation
- Dependency and recovery (d&r)
- Education, training and employment (ete)
- Emotional wellbeing
- Family and significant others
- Finance, benefits and debt (fbd)
- Lifestyle and associates
- Social inclusion

Her Majesties Courts & Tribunal Services (HMCTS) – The London Probation Service is committed to ensuring that the order of the Court is managed and enforced. As such we will ensure that there is timely enforcement of an order or licence where appropriate for domestic abuse perpetrators.

Q1 – No update requested

Q2 – No update provided

Q3 – Jamie to provide

END

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Priority 3 – Keeping Young People Safe

Quarter 3 2022/23 – Update

Partners – Youth Justice Service, Police, Community Safety & Education,

Priority 3

The ambition for our borough is for it to be safe for our children and young people, where they can grow up, thrive, and have the best life chances in families who flourish, and are happy to call Bromley home.

To achieve this, we want to improve neighbourhoods affected by anti-social behaviour and crime. We want to reduce crimes that cause the most harm to children and young people, by preventing them through early intervention (where possible) for those who are at risk of offending, or re-offending. There are key interrelationships between this priority and our other priorities.

Aims

To improve outcomes and life chances for children and young people in contact with the youth justice system, or at risk of becoming involved in crime and anti-social behaviour by

- Reducing the number of first-time entrant children in the youth justice system, and reduce re-offending
- Reducing the number of knife crimes, by volume and repeat victims and reduce levels of serious youth violence
- Preventing and reducing substance misuse

Commitments within the SBPS	RAG Status
<p>1. Provide Support</p> <p>Set up an in-house Prevention Support Programme working closely with Community Safety and Children's Social Care to assist children early away from offending.</p> <p>We have a prevention support programme offer for children and young people who are deemed as being at risk of offending usually those young people who are usually engaging in anti-social behaviour, coming to the attention of Police or other professionals, or their families have concerns about their behaviour. This is designed to help them avoid getting into further trouble that could lead to them having a criminal record as this can seriously impact on their futures. Therefore, we provide support that makes it easier for young people to achieve positive</p>	Achieved

<p>outcomes and make positive decisions by delivering a tailored support plan designed to keep young people on the right path away from offending.</p> <p>The aim is to work with young people and their parents/carers on a voluntary basis.</p> <p>This action has been completed and the service is currently available to all children in the borough.</p>	
<p>Publish a serious youth violence toolkit.</p> <p>We utilise the Violence Reduction Unit (VRU) and Youth Justice Board (YJB) toolkits to ensure comparative approaches and practices to other London Boroughs</p>	Achieved
<p>Deliver the cross-cutting key actions within the Youth Justice Strategy 2019-21 and the Serious Youth Violence Strategy 2018.</p> <p>The Youth Justice three-year strategy 2020-2023 is being delivered and is overseen by the Youth Justice Executive Board.</p>	Achieved
<p>2. Work with Partners to disrupt gangs</p> <p>We undertake tracking of gang activity and share information on those young people who have associations with gangs, through the weekly Missing, Exploited, Gang Affiliated (MEGA) meetings.</p> <p>The Youth Justice Service (YJS) carries out its responsibilities to safeguard and promote the welfare of the child. The Head of Service for Children's Services provides quarterly reports to the Safeguarding Board on how the service is fulfilling its duties.</p> <p>Youth Justice Service staff are required to do safeguarding training provided by our Safeguarding Board as well as access to a wide variety of training both in house and externally.</p> <p>The issue of serious youth violence (SYV) has become a higher priority across London and locally. The YOS attends and contributes to MEGA and shares information on the children known to YOS.</p> <p>Safeguarding is a statutory duty as defined in the Children's Act 1998 and 2014.</p> <p>YOS staff have safeguarding training as well as access to a wide variety of training both in house and externally.</p> <p>Community Safety</p> <p>The Serious Youth Violence & Gangs officer attends the BCU's Daily Crime Grip meetings, to stay abreast of local incidents in real time. This officer is an active member of the MEGA panel. They have also reviewed the Violence & Vulnerability Action Plan (VVAP). This will enable Community Safety and key partners to deliver in accordance with local priorities.</p>	Achieved

Sandra Campbell of the LBB Community Safety team organised the installation of 2 knife amnesty bins in the borough. One on Station Road Anerley and one on Walters Yard in Bromley.

Q1 – Update not requested

Q2 Update

VVAP update is almost complete, work is ongoing to map known individuals regarding social relationships to illuminate networks and to develop good practice regarding contextual safeguarding

Q3 Update

The revised VVAP has been updated and shared with partners in January 2023.

Met Police

The Gang Matrix continues to be monitored daily. At the weekly proactive meeting and the monthly Tactical Tasking Coordination Group (TTCG), constantly assessing risk in relation to gang nominals and crime hot spots ensures officers from various local and specialist teams within the BCU are tasked accordingly.

Provide gang awareness training

The gang awareness training is regularly refreshed and delivered by the SYV&G officer to YOS staff, the youth service, Children's' social care and other key partners. The training covers understanding the mindset of street gangs and those involved in violence, and the tools to use when working with young people and those vulnerable to gangs, how to support young people to exit gangs, as well as applying for gang injunctions where appropriate.

The Youth Justice Service continues to work with children and young people involved in serious offending including those with gang affiliation and/or association.

We also support young people with gang trained mentors and positive role models.

Achieved

Support young people to exit gangs, as well as applying for gang injunctions where appropriate.

The YOS continues to work with children and young people with actual and potential gang affiliation and association.

The Pan London Response and Rescue Service provide opportunity for wider support and intelligence information to enable us to have an understanding locally of our children's involvement in gangs.

Achieved

3. Work with partners to address knife crime, serious youth violence, child exploitation and anti-social behaviour

We have developed a weapons awareness programme in response to the increasing concerns of young people carrying weapons. We aim to run this throughout the year to help and raise awareness of the risks and the consequences both for the knife carrier and others. It is anticipated that young people will recognise and be educated around the legal aspects and their own personal safety.

Achieved

<p>Individual weapons awareness work has been carried out virtually and face to face with young people at risk and in targeted schools and through the YOS.</p>	
<p>Partnership taskings to develop and deliver the Violence Reduction Action Plan</p> <p>The Youth Justice Service and Youth Service contribute to the action as required, providing update of the work we are engaged in.</p> <p>Reduction of violence is delivered via the work streams within the Violence & Victimation Action Plan (VVAP), the Gang Violence Matrix, the Violence Against Women & Girls strategy, the Youth Justice Strategy and the Police led Violence Reduction Team.</p> <p>The governance of the VVAP plan (which contains the actions in the associated plans and strategies as highlighted above, sits with Community Safety.</p> <p>In June 2020 Steve Bending from the GLA virtually visited Bromley to review progress against the actions stated within the plan. In providing feedback he noted that the visit was productive and that it was clear that as an outer-London borough there was a clear focus on violence reduction and strong leadership. Key highlights were the work of the Gangs MEGA Panel, the work of Trading Standards and the weekly community safety meetings undertaken with the South BCU leadership team. Indeed, he is proposing to suggest that this type of meeting should be adopted by all BCUs across London as this provides a regular opportunity to brief/catch-up and task resources as a weekly support to the monthly TTCG.</p> <p>Following the visit, actions within the plan were refreshed by the VRU and 4 new actions were included. The first around governance, and this set out how the Children's Safety Partnership (CSP), the two safeguarding boards and the Health and Wellbeing Board must co-ordinate to provide a public health approach to reduce violence. Two new actions related to support for parents and carers and the one looked at local multi-agency safeguarding hub arrangements.</p> <p>Moving forwards and in the spirit of positive engagement of borough partnerships and an ethos of collaboration, the VRU intends to provide some virtual learning hub sessions through London Councils and London Heads of Community Safety (LHoCS) that can support shared learning and ideas.</p>	Achieved
<p>Working with partners to recognise that child exploitation must also be understood in terms of its connectivity with a wider range of vulnerabilities that young people can be exposed to, including harmful sexual behaviours, missing children, gang involvement and youth crime.</p> <p>There is evidence of effective joined up work between services within Children's Social care, youth justice and youth support services. All relevant staff are trained.</p> <p>Met Police</p> <p>The Police Safer Schools teams target the schools for which they are responsible. This targeting has enabled officers to spend more time within key schools carrying out engagement activities allowing them to identify vulnerable children at greater</p>	Achieved

risk from child exploitation, both criminal and sexual. Every school, both primary and secondary, has a school liaison or Safer Schools officer allocated to them. This may be an officer posted to the Safer Schools Unit, a Dedicated Ward Officer or a PCSO (if a primary school). Every Safer Schools officer has completed Op Aegis (safeguarding training) and have received training with regards to indecent images. All schools' officers received enhanced vetting before taking up their role.

Achieved

Working in partnership with the Police Anti-Social Behaviour Team, and schools to address anti-social behaviour issues, through the adoption of an early intervention approach, that utilises informal approaches that can be escalated to formal enforcement where necessary or appropriate.

There are examples of good joint working between agencies, and the LBB Statutory Nuisance & ASB Team and SNT's engage with children, parents, Housing Associations, Children's Services, and schools to develop bespoke and effective approaches that address reported concerns, and which seek to prevent the child entering the criminal justice system.

See attached case study for illustration

Met Police

Have collated and considered many options and activities offered by 3rd sector organisations that steer children away from crime such as the London Village Network and the Crystal Palace Trust – as well as having the Police officers that work on diversionary activities for children.

Achieved

4. Carry out joint operations with Trading Standards, Licensing and Police

Deliver a programme of test purchasing in respect of age-restricted legislation pertaining to products and activities including, sale of alcohol, cigarettes, knives, corrosives, and solvents, as well as undertaking checks regarding underage gambling and drinking on licensed premises.

The pandemic resulted in the need to pause all test purchase operations, but the programme recommenced in June 2021. A stepped approach to enforcement is built on assessing risk, which considers all relevant, available information and intelligence to make an informed assessment of the likelihood of compliance. Our model works through initial advice, gathering intel through complaints or other sources, if appropriate test purchasing with an 18 to 21-year-old to test compliance of the Challenge 25 scheme, and then following up any failures with an underage test purchase. This approach sets out a clear pathway of escalation which, if culminating in a sale to an underage person, will result in a licensing review or prosecution. This also helps to set out the business' approach to and history of compliance. A full programme of test purchasing is now under way.

Q3 update - As part of an annual programme of intelligence led test purchasing the trading standards team conducted 20 test purchases to test compliance with the Challenge 25 due diligence systems adopted by retailers to prevent the illegal sale of age restricted goods. The focus in this quarter was fireworks, although alcohol and vapes were also targeted. The campaign resulted in one sale of a vape, which will now be followed up by an under age test purchase.

<p>5. How we know if we are on track</p> <p>This theme will be included as a substantive discussion item at the Safer Bromley Partnership Board in Quarter 3.</p> <p>This report was presented in Quarter 3</p>	Achieved
<p>Partners will present an end of year update in Quarter 4</p> <p>This is presented here, notwithstanding this, The YOS has three national key performance indicators set by central government: Reducing First time entrants, reducing offending and reoffending and reducing the demand for custody. These indicators are used by the Youth Justice Board (YJB) to measure our performance. There has been a delay on the part of the Ministry of Justice in publishing the latest data, so we are reliant on the previous data outturn, which is has been delayed by 7 months.</p> <p>This is presented here, notwithstanding this, the YOS has 3 national key performance indicators set by central government:</p> <ul style="list-style-type: none"> • Reducing first time entrants to the criminal justice system • Reducing offending and reoffending and • Reducing the demand for custody. <p>These indicators are used by the Youth Justice Board (YJB) to measure our performance. The performance of the YJS for the last year shows positive outturn in relation to these KPI's. In relation to key targets for first time entrants, reoffending and the use of custody is encouraging. We continue to see reductions in first time entrants, lower numbers of young people in the cohort being tracked in relation to offenders and the actual number of re-offenders is reduced as well as low custody numbers.</p> <p>The annual cohort of children offending reduced by 31%. Our rate of reoffending is also 4% lower than two years ago.</p> <p>Our delivery objectives continue to focus on the key performance indicators as well as a local focus on areas that we know will make a difference in improving outcome for our children and young people.</p>	Achieved
<p>First time entrants into custody and re-offending will be monitored through 3 national KPI's</p> <p>First time entrants</p> <p>Preventing first time entrants (FTE) into the Youth Justice System continues to be positive. This measure helps us to understand how effective the local area is in supporting young people not to offend. The number of FTEs entering the criminal justice system is tracked by the YJS for an annual period. The latest figures available are for the period October 20 – September 21</p>	First Time Entrants

- 44 Young people became FTEs into the criminal justice system during October 20 – September 21. A 2% reduction in the actual number compared with the previous year.
- Bromley's rate of FTEs has reduced annually by 6% and is 34% lower than the average for London.
- Bromley's rate of FTEs is 12% below the national average and 7% lower than authorities used for statistical comparison.
- Bromley has the lowest rate of FTEs compared with the 6 surrounding boroughs. (Bexley, Croydon, Southwark, Lewisham, Lambeth, Greenwich)
- Bromley has the 6th lowest FTE rate in London is ranked 57th out of the 154 YJSs nationally.

Bromley YJS triage an average 100 cases a year and issue an average of 15 community resolutions a month. This has a direct impact on keeping the number of FTEs low in comparison to the London and national average. (A young person receiving a triage or community resolution for a 1st offence prevents them from becoming a FTE).

Offending and re-offending

The youth justice system supports young people who previously offended not to reoffend. It is a quarterly rolling measure of the rate of re-offending after 12 months of a cohort of young people. Data taken locally shows that age plays a significant part with the older young people being more prolific in their offending.

The YJS tracks a cohort of offenders who received a pre-court, court disposal or were released from custody in a 12-month period. The latest figures available are for April 19 - March 20. (Tracked until the end of March 2021).

- Of the 83 young people that received a YJS intervention 27 (33%) reoffended within a 1-year tracking period. Bromley YJS have achieved a 4% reduction in the rate of reoffended compared with the previous year of April 18 - March 19
- The cohort numbers are reducing year on year so less children offending.
- Bromley YJS reoffending rate is 7% lower than the average for London but is 2% higher than the national average. Bromley's reoffending rate is 1% higher than our statistical neighbours.
- Bromley has the 6th lowest reoffending rate in London and is ranked 71st out of the 154 YJS in the country.

Offending & Re-Offending

<ul style="list-style-type: none"> The YJS had been working with several children and young people with a variety of complex issues and challenging behaviours. Bromley has an offence frequency rate of 1.00. A total of 83 offences were committed by the (27) individuals who reoffended. <p>Reduce the rate of young people who are sentenced to custody</p> <p>This covers the number of young people sentenced to custody in an annual period between January 2021 – December 2021. Good performance is typified by a low figure. The data below is the latest verified and published by the Ministry of Justice in April 2022. Exceptional reporting happens at the YJS Executive Board.</p> <ul style="list-style-type: none"> 1 young person was sentenced to custody between January 2021 – December 2021. The YJS continues to offer a robust package of support when the courts are considering remands into custody. We currently have no children on custody in remand. Bromley is currently ranked 32nd out of the 154 YJS in the country and has the 4th lowest rate of custodial sentences in London. 	Reducing Demand for Custody
<p>Youth Offending Service will complete an in-depth analysis to identify areas of focus for the above.</p> <p>The YOS has a detailed improvement action plan that charts all aspects of work of the service. This is overseen by the Assistant Director and Director of Children's Services.</p>	Achieved
<p>Serious youth violence will be measured by the Mayor's Office for Policing & Crime (MOPAC) Crime Dashboard and also through local data.</p> <p>This data is published on the MOPAC dashboard and used to measure outcomes. Repeat offenders are monitored by the MOPAC dashboard and local data. Measure success of reduction in weapons crime through published data on Mayor's Office for Policing & Crime performance framework.</p>	Achieved
<p>Community Safety will attend and add value at Youth Offending Service Board Missing, Exploited, Gang Affiliated and Multi Agency Child Criminal Exploitation.</p> <p>The Serious Youth Violence and gangs officer attends MEGA and both they, and the Head of Service for Community Safety, Environmental & Domestic Regulation attend MACE.</p> <p>Senior Public Protection managers are active on the YJS Executive Board provide and updates on every occasion.</p>	Achieved
<p>Victims will be monitored by local data over time to look at reductions of numbers.</p>	Achieved

Victim engagement is measured by the YOS and there is a RJ worker in the service who makes contact and delivers restorative interventions to victims of youth crime. We have high victim contact and lower levels of engagement and this is very similar across the country. In view of this we spend a lot of time building relationships with victims and ensuring that their wishes and feelings are incorporated into the interventions that we do with children and victims.

Talking about something that has happened and affected someone in a negative way is central to the Restorative Justice (RJ) processes. Speaking openly and honestly in a safe environment enables those involved to understand why something happened, the impact, what could be done to address the harm caused and how this can happen. The voice of the child - their thoughts and feelings - is a crucial part of the process and forms the basis for all RJ and victim impact work undertaken with the young people.

6. Impact of COVID 19 on Business as Usual

We have reviewed how we work with children; safety and well-being are of utmost priority. We continue to see children, particularly those who are high risk and highly vulnerable, face to face.

This has included home visits and setting tasks for children to complete in relation to their offending.

We constantly review our service delivery offer we are reducing the use of digital media and getting back to pre-pandemic but with the option of a hybrid model of delivery.

7. General Annual Update of achievements

In the last year we published our Youth Justice Strategy 2020/23. It sets out our ambitions for our children by improving their life chance and outcomes. Our work as a YJS Partnership is guided by the 'Child First, Offender Second' principle. As part of this we have changed our name to **Bromley Youth Justice Service** in recognition of the maturity of the service as well as moving away from stigmatised language of referring to children as offenders, they are children who are in the justice system because they have offended.

Over the last year we have achieved the following:

- Safety and well-being are at the forefront of all the work with do with all our children and victims
- The voice of victims is heard, and harm is addressed through their wishes (where appropriate)
- Tackling disproportionality for both YOS and Partners
- Developing and training our workforce with a comprehensive training offer in place for all staff
- Utilising local resources to support a high-quality service and personalised delivery offer to our children and families
- Our performance is better driven by analysis of statistical data, other qualitative and quantitative evidence, and information including feedback from service users, parents/carers and children

Achieved

Achieved

- Our assessment and plans are well informed and actively involve the child in the planning process to ensure there is a shared ownership with achievable outcomes
- The range of complexities that our children experience is well managed by the service and partners
- Our new governance arrangements are in place with commitment from senior partners in understanding and scrutinising the work of the YJS partnership, and understanding of the agencies contribution to reducing offending

Further work on our priorities will continue over the next year 2022-2023.

We are focused on desistence, prevention and diversion from offending and have developed a safeguarding rainbow well-being model and have built on this idea to reflect our YOS cohort.

Q1 Update not requested
Q2 Update provided with minutes

Case Study

What's the story?

ASB case worker received an application from Police requesting an intervention for a young person "J Smith" who had been increasingly coming to Police notice for being part of a small group who were allegedly harassing and intimidating a small shop owner and his customers.

What did the ASB officer do?

Based on the evidence supplied by Police, the ASB Officer felt that the best intervention for J would be an Acceptable Behaviour Commitment (ABC). This is a contract made with the child, their family, and any other agencies involved. It states positive conditions of behaviour that the child agrees to adhere to, to prevent them from making poor decisions that could result in them entering the criminal justice system. This was especially pertinent as the Officer was aware that J's older sibling was well known to Police as they had been involved with local gang.

Enquires were made to partner agencies to ascertain the interventions or connections with partner agencies. Moreover, as J was getting into trouble at school by playing around in class and at times being rude and argumentative to teachers, school requested to be part of the intervention process.

What difference did the ASB Officer make?

The officer arranged a meeting at J's school. This included J, their parents, the ASB Officer, the ASB Police Officer and J's Head of Year.

Initially J's parents were very concerned that their child was going to be categorised as a problem due to the gang connections of their older sibling. Quite rightly, they felt that this would be unfair, and the ASB Officer was able to

explain that the idea behind this intervention was purely to try and help J make better decisions at the right time, which was hoped would help keep J on the right track.

During the meeting the ASB Officer asked J to reflect on his past actions, and to take a pause before they perhaps committed to detrimental actions in future. The officer went through a process that J could apply in real time, that would give them the space to think before they acted.

The ABC was put in place and monitored for the next 6 months during this time J did not come to Police notice and their behaviour also improved at school.

What difference did the ASB Officer make specifically to our Children and Young People that are, or were, involved with the YOS?

J was in danger of being arrested for various offences (including public order offences), and should they have continued unabated, the likelihood was that they would receive a criminal sanction.

The intervention of the ASB officer helped to prevent the situation escalating, and J's behaviour improved moving forwards.

Example of Partnership working

During this whole process a team of professionals worked in partnership with Police and Education, not just in the implantation of the ABC but for the next 6 months whilst the ABC was live.

Comments of parents / carers, children and young people

J's parents were really concerned as the behaviour of their eldest was already attracting police attention. As such, they were relieved that there was the option of an early intervention that assisted J to make positive changes.

The family were encouraged to contact the ASB officer should they have any concerns, or if they needed more support. If required, the Officer can complete a referral to Bromley Children's Project or any other service that could assist this family.

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Priority 4 – Stand Together Against Hate Crime and Extremism

2022/23 Quarter 3 – Update

Lead Partners – Police and Community Safety

Priority 4

This Priority focuses on work to tackle those crimes that are motivated by malice or ill-will towards a social group, based on race, religion, sexual orientation, disability, gender identity or any other protected characteristic.

Aims

To improve reporting of hate crime and to reduce repeat victimisation of victims of hate crime

Commitments within the SBPS	RAG Status
<p>1. Undertake ongoing analysis</p> <p>Use an analysis of hate crimes levels, to ensure increases and trends are identified and tackled early.</p> <p>In the Police and Crime Plan 2021-25, the Mayor of London highlighted Hate Crime and intolerance as a priority, and the Hate Crime Dashboard monitors the level of crime throughout London. The dashboard is actively monitored by MOPAC to establish levels of crime, public perception, and victim satisfaction. The Mayoral approach to hate crime will focus on three things, prevention, supporting victims, and oversight of police enforcement activity.</p> <p>The Police and other actors in the Justice system are in the process of reviewing their processes and procedures in the light of well publicised news events</p>	Achieved
<p>2. Work with Partners</p> <p>In partnership the Safer Neighbourhood Teams (SNTs), Police and, community and faith groups, will work to raise awareness and tackle all forms of hate crime.</p> <p>SNT Police</p> <p>The response officers have received additional training in identifying hate crime and changes to how hate crime is reported to allow easier and more</p>	Achieved

accurate flagging of incidents. Each hate incident is then monitored weekly and, as such, is overseen with greater scrutiny and control.

In partnership, the SNTs and community and faith groups, work to raise awareness and address all forms of hate crime as well as prevent and improve support for victims. The Safer Bromley Partnership support strategies that aim to increase the reporting of hate crimes and incidents.

Community Safety

Head of Service attends the Pan London hate crime forum and the BCU Hate Crime Trends & Updates meetings monthly. Improved advice for all aspects of the Safer Bromley Partnership Strategy, including pages on Hate Crime are awaiting update on the council's website. This work has been delayed by a corporate website project and it is hoped it will go live by the end of Q2 this business year.

Q1 Update – Not requested

Q2 Update – Webpage review awaiting completion of new set of pages – delayed due to staff illness and bereavement and limitations on what can be uploaded to the webpages – Community Safety Team are currently working on workarounds

Q3 Update – Due to the onboarding burden of new starters in the Community Safety team the actions to update the webpages have been pushed back to Q4.

Community Coordination

LBBs Community Coordinator, Counter Extremism Policy & Communities Gateway and the Strategy and Engagement Offices support the BCU. They work closely with community and statutory partners to ensure that all hate crimes are captured and passed to the Police who then triage reports and provide support to victims via the Catch referral project. In addition, they work to ensure that ongoing communication is delivered through campaigns that promote the message that reporting is key, as to do so raises awareness and provides the Police with a more informed view of where to target their resources to greatest effect.



Maintain a high visibility in the community by delivering talks and awareness raising events

Achieved

Met Police

The review of ward panels was completed and has subsequently been published as the Ward Panel Framework Review. It also contains as Terms of Reference for panels. Most panels have now returned to face-to-face meetings. The Police are also undertaking more community outreach with regard their Safer Streets walk and talk consultation programme.

Trading Standards

Trading Standards have been unable to deliver their usual high numbers of talks and awareness raising events in the community. Sessions were delivered via online platforms but face to face sessions are now returning.

Trading Standards have also launched regular electronic alerts raising awareness of local and national scams and rogue trader issues and these are shared with partners and communities to protect the aged from targeted crime.

Q1 – Update not requested

Q2 – Work regarding alerts and public presentations to vulnerable and interest groups continue

Q3 – Between 1st October 2022 and 31st December 2022 Trading Standards officers delivered 9 awareness raising talks in the community to help empower vulnerable residents to protect themselves from scams and rogue traders. Around 250 attended these events.

The team circulated nine ‘Trading Standards Alert!’, an early warning system which alerts residents and partners of scams and doorstep crime in the Bromley borough as it happens. This included a special edition on the dangers of buying second hand electrical equipment and linked into safety messages from the LFB

Community Coordination

Support has been sought from 3rd party hate crime specialists to facilitate awareness training with community partners, local businesses via the BID, and sports facilities including local football clubs, these organisations are being supported and encouraged to become 3rd party hate crime reporting hubs.

Awareness training and support has been provided to several voluntary sector organisation who support women in the borough including those working around addressing VAWG and Hate Crime.

Ensure training on how to spot financial abuse is delivered to practitioners within social care, Police, and other relevant stakeholders

This training has been delivered previously and will be repeated as face-to-face sessions return. In the past 12 months trading standards received 59 referrals from social care colleagues, 13 referrals from banks and 18 from local police. Extensive training was provided to police colleagues across the BCU to highlight the work of trading standards and encourage a joined-up response to financial abuse involving a transaction.

Q1 Update not requested

Q2 Update – Presentations continue.

Q3 Update – Presentations continue.

Achieved

Ensure a rapid response service is provided to all urgent requests for assistance.

The team continues to disrupt rogue traders and there were 26 rapid response interventions where officers attended the homes of residents immediately following a call for assistance. One response resulted in a £12,000 for an elderly couple who had been cold called by traders seeking

Achieved

to extract payment for unnecessary roof repairs. Another has identified a saving of £36,833 and a further intervention saved a resident £18,000. Several individuals related to these incidents are under investigation.

Q1 Update not requested

Q2 Update – rapid responses continue for latest figures see update for Priority 1

Q3 Update – The service received 39 calls to the Rogue Trader Rapid Response number, resulting in 5 immediate responses to incidents involving a vulnerable resident. In one case a resident had been cold called by builders who then persuaded him to agree to so called essential repairs to his property totalling £100k. Officers were called to his bank where police were in attendance following a call by concerned bank staff. Trading Standards officers attended immediately and were able to prevent £50k being paid. Officers from trading standards are now investigating this matter as fraud after commissioning an expert to review the work which has been largely dismissed as worthless.

Achieved

3. Encourage support from communities

Undertake community tension assessments if needed and encourage communities to report incidents of hate crime as they occur.

A weekly community tension report is submitted by Police and monitored locally and centrally by police specialist teams. This includes Faith, LGBT, open-source media and intelligence from partners. Following any critical incident, a specific tension report is conducted and consideration to Gold groups to support these on an ongoing basis if required.

Q1 Update not requested

Q2 Update

Community Safety team are currently developing a list of community leaders and contacts for future should they be needed – community tensions in Bromley are generally low but the number of Hate Crimes was/is unduly high in comparison to other crime types in the annual Crime Needs Assessment

Q3 Update – The list of Community Leaders and advocates contact details continues to be updated and to grow. This action is now being taken forward by Gordon Falconer the Interim Team Manager for Community Safety.

Achieved

4. Continue to fulfil our Channel and Prevent duties

Review of Prevent

The Government's review of Prevent has yet to be published.

Q1 – Update not requested

Q2 – Update - The long awaited Prevent review is now expected to be published towards the end of this year. Locally, referrals into Prevent remain low following a small increase in the previous period

Q3 – The local authority continues to facilitate a Channel Panel which is an early intervention scheme that supports people who are at risk of radicalisation and provides practical support tailored to individual needs. It

can help people to make positive choices about their lives. The Prevent review has still not been published.

Channel

The Channel annual assessment has been presented to the Chief Executive, together with the Counter Terrorism Local Profile.

Training and raising awareness

The Workshop to Raise Awareness of Prevent continues to be delivered online to social care professionals and a range of partners.

Anyone can access (and share) the website for the ACT counter terrorism information and advice via this link: <https://actearly.uk/>

London Prevent Network (LPN)

The LPN is a network of prevent coordinators and leads who are centrally funded or otherwise from all London boroughs, priority or non-priority and other key priority areas in the wider Southeast region. Meetings are held twice a month (virtually) and are attended by LBB.

London Prevent Board

The Assistant Director of Public Protection (or their representative) has attended all London Prevent Board meetings on behalf of the Chief Executive. These meetings are held 4 times a year.

5. Support for victims

Work to support those who are victims of hate crimes

See Section 3

Achieved

6. Restorative mechanisms

Explore options for restorative justice mechanisms.

See Section 3

Achieved

7. Protecting victims of doorstep crime or scams

Trading Standards received around 250 complaints and enquiries about scams and doorstep crime on the past 12 months, with total financial impacts of over £1.6 million. 112 calls were made to the dedicated rapid response number.

Case study – Tom is 80 and a victim of carbon credit scams. He has capacity but was targeted by scammers for some time. When we got involved, he confessed to handing over an “embarrassingly large amount of money” but the true extent of his loss was kept a secret from his family. During his victimisation, he lost his wife and

Achieved

the scammers used this to strengthen their bond with him. He was unknown to social services, but his bank account had previously been flagged. Police had been involved but for a long time he refused to believe he was the victim of a scam and continued to respond to demands for payment to recover his investments. We fitted a call blocker to his phone and analysis of this device showed he was getting 70 scam calls a week. We also arranged a befriending service through Age UK as he was very lonely, despite having a strong family support network. After engaging with colleagues from the national trading standards scams team, we supported the family in writing a letter to his bank to see if they would reimburse his losses. He was eventually refunded a significant sum.

Q1 Update not requested

Q2 Update – see update in Priority 1

Q3 Update – Trading Standards received 212 service requests of which 43 related to doorstep crime and scams, with a total consumer detriment of £1,204,326.

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8. How we know we are on track?

This theme will be included as a substantive discussion item at the Safer Bromley Partnership Board in Quarter 4 and present an end of year update in December.

Presented

Achieved

The Metropolitan Police Hate Crime and Special Crime Dashboard will be used to monitor increased reporting of victims of Hate crime.

See Section 3

Achieved

Data is published into the public domain monthly for each London Borough. Data through the Mayor's Office for Policing & Crime Hate Crime Dashboard for figures at a borough level will be monitored.

MOPAC Data is automatically provided by Met police for publication.

Achieved

Levels of early identification of hate crime and extremism through referrals will be monitored and tracked

This is covered at multiple partnership meetings across BCUs and pan London.

Achieved

The number of rapid response calls to the rogue trader hotline, and the associated outcomes will be tracked and monitored.

Trading Standards track and monitor the scam hotline and its associated outcomes.

Achieved

<p>Q1 Update not requested</p> <p>Q2 Update – see update in Priority 1</p> <p>Q3 Update – The service received 39 calls to the Rogue Trader Rapid Response number, resulting in 5 immediate responses to incidents involving a vulnerable resident. In one case a resident had been cold called by builders who then persuaded him to agree to so called essential repairs to his property totalling £100k. Officers were called to his bank where police were in attendance following a call by concerned bank staff. Trading Standards officers attended immediately and were able to prevent £50k being paid. Officers from trading standards are now investigating this matter as fraud after commissioning an expert to review the work which has been largely dismissed as worthless.</p>	
<p>The Reporting of Hate Crime</p> <p>Previously MOPAC data has been used to report on this section. However, this data has now been changed as crime stats are now made available in a changed format via the MPS. This now provides rolling 12 month crime data as per the attached data sheet.</p> <p>You will note from the SBPS that the focus here was to improve reporting of hate crime and to reduce repeat victimisation of victims of hate crime.</p> <p>Hate crime has been the subject of several proactive media campaigns across London and there have been massive attempts to increase confidence in people to report. For example, last month was LBGT+ month and officers are now flagging potential hate crimes differently.</p> <p>The BCU and SNT officers have also been increasingly using crime report flagging to re-engage with victims who may be subject to hate incidents to ensure all aspect of crimes are explored. It is a measure of success in many ways to see a broader increase in hate crime reporting as this suggests confidence in reporting is improving. Most hate crimes reported in Bromley are rooted in Race.</p> <p>The RAG status here is split, as the target for increasing the reporting of this crime type is being achieved, however, ongoing work and commitments need to be maintained, to effectively address the perpetrators of this high harm crime</p>	In Process Achieved
<p>9. Impact of COVID 19 on Business as Usual</p> <p>See above</p>	
<p>10. General Annual Update of achievements</p> <ul style="list-style-type: none"> • Interventions by trading standards have resulted in total financial savings of £507,127 over the past 12 months. This includes estimated future financial savings relating to scams and doorstep crime of £210,035 with estimated healthcare saving and health related quality of life savings of £113,419. Savings from the installation of 3 call blocking devices are estimated 	

at £82,703 with estimated healthcare savings and health related quality of life savings based on the 5-year call blocker program of £44,659.

- Most of the strategic actions for this priority have been achieved
- There is improved awareness and better reporting of hate crime

Agenda Item 14

Report No.
ES20252

London Borough of Bromley PART ONE - PUBLIC

Decision Maker:	PUBLIC PROTECTION AND ENFORCEMENT POLICY DEVELOPMENT & SCRUTINY COMMITTEE		
Date:	Tuesday 31 January 2023		
Decision Type:	Non-Urgent	Non-Executive	Non-Key
Title:	BROMLEY DOMESTIC ABUSE SERVICES - INFORMATION PAPER		
Contact Officer:	Sarah Newman, Head of Domestic Regulation. E-mail: sarah.newman@bromley.gov.uk Louise Watkinson, Assistant Director of Public Protection E-mail: louise.watkinson@bromley.gov.uk		
Chief Officer:	Assistant Director of Public Protection, Director of Environment and Public Protection		
Ward:	(All Wards);		

1. Reason for decision/report and options

- 1.1 This information paper is intended to outline the current position regarding the provision of the Domestic Abuse Service (DAS) in the borough following the decision to move the service from Early Intervention & Family Support to Community Safety from November 2022.
-

2. RECOMMENDATION(S)

2.1 Note the content of the report.

Impact on Vulnerable Adults and Children

1. Summary of Impact:
 - 1.1 The Domestic Abuse Service benefits all residents but is of particular benefit, and support for, vulnerable adults and children who are victims of domestic abuse.
 - 1.2 It provides support for both victims and perpetrators of domestic abuse as well as their wider family.
-

Transformation Policy

1. Policy Status: Not Applicable
 2. Making Bromley Even Better Priority:
 - (1) For children and young People to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.
 - (2) For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.
-

Financial

1. Cost of proposal: Not Applicable
 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): 1.0 FTE
 2. If from existing staff resources, number of staff hours: 1.0 FTE
-

Legal

1. Legal Requirement: Statutory Requirement

The Local Authority has statutory duties in respect of combating domestic abuse and providing support to victims of domestic abuse. There is also statutory guidance to this effect. Some particulars are set out in the relevant section below.

2. Call-in: Not Applicable
-

Procurement

1. Summary of Procurement Implications: Not Applicable
-

Property

1. Summary of Property Implications: Not Applicable
-

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: No carbon implications.
-

Customer Impact

1. Estimated number of users or customers (current and projected): All residents that are affected by domestic abuse. An example of service users is in 2021/22 there were at least 1,722 service users (see Chart 1).
-

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 What is domestic abuse?

- 3.1.1 Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over and are “personally connected”. Two people are “personally connected” to each other if any of the following applies:
- a) they are, or have been, married to each other.
 - b) they are, or have been, civil partners of each other.
 - c) they have agreed to marry one another (whether or not the agreement has been terminated).
 - d) they have entered into a civil partnership agreement (whether or not the agreement has been terminated).
 - e) they are, or have been, in an intimate personal relationship with each other.
 - f) they each have, or there has been a time when they each have had, a parental relationship in relation to the same child.
 - g) they are relatives.

It can happen to anyone, regardless of gender, age, ethnicity, sexuality, background, or socio economic status. There are different types of abuse, and it is certainly not always physical as outlined below.

Domestic Abuse Defined

Emotional abuse - Is sometimes called psychological abuse and involves the emotional mistreatment of a person. Examples of this are humiliation and constant criticism, threatening, shouting, name calling, making a person feel small and manipulation.

Physical abuse - Involves deliberately hurting or injuring a person e.g., hitting, punching, biting, throwing things, pulling hair, and holding a person down.

Sexual abuse - Sexual behaviour or a sexual act that is forced upon a person without their consent or by taking advantage of the person.

Financial abuse - Is also known as economic abuse and includes controlling a person's money and finances, taking out loans or credit cards in their name without consent, stopping them from working or keeping the money they earn.

Coercive control - An abuser may not be physically violent, but use threats of violence, intimidation, and manipulation to make a person feel controlled, fearful, exploited, and isolated from support.

Domestic abuse also includes female genital mutilation, forced marriage and honour-based abuse.

3.2 Why is dealing with domestic abuse a high priority?

3.2.1 Key reasons that domestic abuse is a high priority are:

- It will affect 1 in 4 women and 1 in 6 men in their lifetime.
- Leads to, on average, two women being murdered each week and 30 men per year.
- Accounts for 16% of all violent crime (Source: Crime in England and Wales 04/05 Report), however it is still the violent crime that is least likely to be reported to the police.
- Has more repeat victims than any other crime (on average there will have been 35 assaults before a victim calls the police).
- Is the single most quoted reason for becoming homeless (Shelter, 2002).
- In 2010 the Forced Marriage Unit responded to 1,735 reports of possible Forced Marriages.
- In addition, approximately 400 people nationally committed suicide each year who have attended hospital for domestic abuse injuries in the previous six months; 200 of these attended hospital on the day they go on to commit suicide.

3.3 Who is responsible for coordinating and delivering the Domestic Abuse Service?

3.3.1 The Domestic Abuse Service Lead Officer, within LB Bromley's Community Safety Team, oversees the funding & delivery of the DAS. They work & liaise with a large forum of over 40 stakeholders to drive forward the Boroughs 2021-2024 [Domestic Abuse Strategy](#). This report sets out our ambition and how partners across the borough will work together, and deliver services to effectively tackle the impacts and effects of domestic violence. The DAS Lead Officer also oversees Bromley & Croydon Womens Aid (BCWA) who have been commissioned to provide services to those impacted and affected by domestic abuse in the borough.

3.4 What does LB Bromley's Domestic Abuse Service provide with its partners?

3.4.1 The work is co-ordinated by a multi-agency Operational Forum which ensures that the Domestic Abuse Strategy is being delivered and making a positive difference. The key elements of the strategy are Provide, Prevent, Protect & Partnership. Examples of services provided are;

- a multi-agency forum undertaking safety planning for victims,
- a 'Drive' perpetrator panel providing support for perpetrators to change their behaviours,
- co-ordination of training packages for professionals covering relevant legislation, risk assessments, safety planning and referral pathways,
- specialised training has also been sourced including effects on children, supporting male victim survivors, and working with perpetrators,
- providing consultation, support, and advice to Bromley services,
- emotional and legal support and housing advice,
- operation of a Children Overcoming Domestic Violence mother and child group,
- domestic abuse training for professionals and in schools,
- Provision of independent domestic abuse advisors to work with residents who are victims of domestic abuse.

3.5 What are some of the key challenges for the service?

3.5.1 Overall, there has been a significant increase in demand for, and complexity of, Domestic Abuse Services for example Chart 1 below shows a year-on-year increase in requests for support from residents via BCWA.

3.5.2 Chart 1 also shows the change in their caseload over the past four years in terms of absolute numbers and the changing demand. Some of this change will have been affected by the pandemic (stay at home, etc.), however numbers have increased overall.

3.5.3 Secondly funding availability and budget squeeze within the public sector is enhancing the difficulty in responding to the rising demand. The expectation to meet this demand however is not reducing and over 75% of these services are funded via external grants. A strategic review is now underway, together with a review of the Safer Bromley Partnership Strategy, to ascertain how to deal with these challenges.

Chart 1: Bromley & Croydon Women's Aid (BCWA) Service Demand:



4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 The Domestic Abuse Service benefits all residents but is of particular benefit, and support for, vulnerable adults and children who are victims of domestic abuse. It provides support for both victims and perpetrators of domestic abuse as well as their wider family.

5. TRANSFORMATION/POLICY IMPLICATIONS

Not applicable

6. FINANCIAL IMPLICATIONS

Not applicable

7. PERSONNEL IMPLICATIONS

1.0 FTE moved between services with agreement of current post holder.

8. LEGAL IMPLICATIONS/BACKGROUND

8.1 The Local Authority has statutory duties to counter domestic abuse.

Where children are involved in a domestically abusive situation, the Local Authority's duties under, inter-alia, s. 31, s.17 and s.47 of the Children Act 1989 may be engaged.

Local Authorities have a duty under s17 of the Crime and Disorder Act 1998 to:

"exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,

(a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment);"

- 8.2 The Domestic Abuse Act 2021 has recently come into force. This creates a statutory definition of domestic abuse, emphasising that domestic abuse is not just physical violence, but can also be emotional, controlling or coercive, and economic abuse. For the definition to apply both parties must be aged 16 or over and “personally connected”. “Personally connected” is given a wide definition in the statute. Importantly the Act defines how children are victims of domestic abuse (s.3 of the Act).
- 8.3 Part 4 of the 2021 Act creates a statutory duty for Tier 1 local authorities to deliver support services for victims of domestic abuse and their children in safe accommodation. London Boroughs are Tier Two authorities (the GLA is the Tier 1 Authority) and are obliged under the act to support the implementation as far as reasonably practicable.

Victims of domestic abuse, who are homeless as a result, have a priority need for accommodation under s.189 (1) (e) of the Housing Act 1996.

- 8.4 The upshot of the above is that the Local Authority must ensure that in transferring the Domestic Abuse Service to Community Support sufficient resources remain in place to meet its statutory duties to victims of domestic abuse.

It is understood that the 1.0 full time worker has consented to the move. However, there may be employment law ramifications if there is any change to contract terms etc. The staff member will need an up-to-date DBS if working with vulnerable adults and children.

9. PROCUREMENT IMPLICATIONS

Not applicable

10. PROPERTY IMPLICATIONS

Not applicable

11. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

No carbon implications.

12 CUSTOMER IMPACT

Ensure continuation of current services at required quality following the internal service move.

13 WARD COUNCILLOR VIEWS

Not Applicable

Non-Applicable Headings:	5, 6, 9, 10, 11, 13
Background Documents: (Access via Contact Officer)	Domestic Abuse Strategy

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Agenda Item 15

Report No.
ES20239

London Borough of Bromley

PART ONE - PUBLIC

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

Date: Tuesday 31st January 2023

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

Title: PP&E RISK REGISTER

Contact Officer: Lucy West, Head of Performance Management and Business Support
Tel: 020 8461 7726 E-mail: Lucy.West@bromley.gov.uk

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

Ward: (All Wards);

1. Reason for decision/report and options

- 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. RECOMMENDATION(S)

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.
-

Transformation Policy

1. Policy Status: Not Applicable
 2. Making Bromley Even Better Priority (delete as appropriate):
 - (1) For children and young People to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.
 - (2) For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.
 - (3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
 - (4) For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future.
 - (5) To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
- Not Applicable
-

Financial

1. Cost of proposal: Not Applicable
 2. Ongoing costs: Not Applicable
 3. Budget head/performance centre: PP&E Portfolios
 4. Total current budget for this head: £2.7m
 5. Source of funding: Existing controllable revenue budget 2022/23
-

Personnel

1. Number of staff (current and additional): 48.3 FTEs
 2. If from existing staff resources, number of staff hours: Not Applicable
-

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.
-

Property

1. Summary of Property Implications: N/A
-

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: Not Applicable
-

Customer Impact

1. Estimated number of users or customers (current and projected): Not Applicable
-

Ward Councillor Views

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

3. COMMENTARY

- 3.1 The Council's aims are set out in [Making Bromley Even Better \(corporate strategy\) | London Borough of 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 23rd September 2022.
- 3.8 At the time of writing, the Council has 125 individual risks (111 departmental plus 14, high-level, Corporate Risks (covering key risks which apply to the Council as a whole).
- 3.9 E&PP Department currently has 28 risks (~22% of the Council's total). The PP&E Portfolio currently has 21 risks.
- 3.10 The appended PP&E 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 11 has a Current Risk Rating of 16, which is red. Whilst funding is now confirmed to March 2025 a further review of funding sources from this point in time is underway to consider the inflationary impacts and mitigation should the external funding not continue. The service is staffed from Public Protection on a voluntary basis and the uptake of shifts has not improved. A decision to deal with this via service provision adjustments and proposing a permanent renumeration package is due to go to PP&E PDS in January 2023. Therefore, it continues that there is no guarantee that an officer will be available and sometimes the service is closed.
- 3.14 Risk 18 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 AND CHILDREN

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

5. TRANSFORMATION/POLICY IMPLICATIONS

- 5.1 The Council’s renewed policy ambition for the borough is set out in [Making Bromley Even Better \(corporate strategy\) | London Borough of 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. FINANCIAL IMPLICATIONS

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

7. PERSONNEL IMPLICATIONS

- 7.1 There are no direct personnel implications, but the Risk Register does identify service areas where recruitment and capacity present challenges (e.g. 8: Staff Resourcing and Capability).

8. LEGAL IMPLICATIONS

- 8.1 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
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Background Documents: (Access via Contact Officer)	None
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9. PROCUREMENT IMPLICATIONS

- 9.1 Contract and hence procurement risk is mainly captured in the Contracts Database and Contracts Register Report rather than this Risk Register Report.

10. PROPERTY IMPLICATIONS

- 10.1 There are no direct property implications, but the Risk Register does identify service areas where Property present challenges.

11. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

- 11.1 There are no direct carbon reduction/social value implications, but the Risk Register does identify service areas where carbon reduction and social values are reviewed (e.g. 9: Climate Change).

12 CUSTOMER IMPACT

- 12.1 There are no direct customer impacts, but the Risk Register does identify service areas that could result in customers being impacted.

13 WARD COUNCILLOR VIEWS

- 13.1 There are no direct Ward Councillor views.

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

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:	09/01/2023
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
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 costs and 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 logged 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. 2. Ensure LBB pool cars are available for LBB staff use 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 Directories, 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. COVID-19 disruption to ways of working 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 or staff work-to-rule / take strike action impacting on service delivery	Cause(s): -Union dissatisfaction over pay and conditions (particularly in Waste) 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 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 - Lower than predicted income from Penalty Charge Notices for Moving Traffic Contravention cameras due to changes in traffic volume and patterns - Reduction in Street Enforcement activity (Fixed Penalty Notices) - Failure of APCOA (new Parking contractor) to provide contracted services (e.g. strikes) - Reduction in TfL LIP funding for traffic and road safety schemes 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, plus consider changing pricing models 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 6. Accelerate removal of P&D machines in favour of cashless payment 7. Consider relocation of MTC cameras 8. Council to consider reprofiling highway improvements and behaviour change projects if funding is reduced to implement Local Implementation Plan (LIP).	Angus Culverwell
7	18	All E&PP	Town Centre Businesses and Markets & reducing living standards due to numerous economic impacts on households 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	Peter McCready

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:	09/01/2023
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
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): -Lack of availability of suitably qualified / experienced staff to replace retirees and leavers. Particular problem within Planning, Environmental Health, Trading Standards and Traffic professions. There are insufficient Planning, EH & TS staff in the market due to efficiencies in staff training across local government over many years and the professions are now 'aging out' also TfL has previously offered better remuneration and career progression locally. Lack of incentive for good staff to remain at LBB. Combining of roles in lean services which do not appeal to professionals who want to do well at their chosen work area e.g. combining roles such as EH statutory nuisance with ASB/community safety work within teams and specific roles. Effect (s): -Loss of organisational memory, need for good quality staff in lean services, greater reliance on expensive contracted staff, delays in delivering services and work plans (e.g. Transport Local Implementation Plan) and lower quality services. Inability to effectively manage contracts as Contract Managers may have started out in a different role (i.e. as Service Managers) and therefore may not have the necessary expertise (i.e. contract monitoring, project management and auditing).	Service Delivery	3	4	12	1. Ongoing programme to find and retain quality staff through internal schemes such as career grades and training and ongoing CPD. Consider development of trainee posts.	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. 4. Positively explore apprenticeship and intern schemes as a possibility to ensure teams can maintain deliverables of the service in terms of client inspections and reporting. 5. Enlist contractor to assist with tree survey backlog. 6. Develop staff in at risk services and teams (grow our own)	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 2027 as part of 10 year climate plan 5. Climate Change included within Corporate Risk Register and risks associated with climate change e.g. increased number of extreme weather events, included within Contract Risk Registers.	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 2027. 3. Public signposting document to be developed early in 2021 to support homeowners and businesses to reduce their emissions.	Colin Brand
10	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	1. Contract in process of being awarded for an initial 3 year term starting in February 2023 with 2 years discretionary extension 2. The new contract is for a Stray Dog & Rehoming service. Pest control will be decommissioned in accordance with PDS decision on 16th June 2022	Sarah Newman
11	29	Public Protection	Out of Hours Noise Service Failure to deliver service	Cause(s): The out of hours (OOH) noise service is dependent on grant funding from the Mayor's Office for Policing & Crime (MOPAC) by way of the Local Crime Prevention Fund (LCPF). This grant is released on a 2 year cycle funding is currently in place until 31 March 25. The grant is being maintained by MOPAC at the same level as previous years, thus is seeing a year on year reduction in its real value due to inflation. As the service is supported by external funding, there is no future guarantee it will sustain. The OOH noise service is staffed on a voluntary basis, and despite the remuneration being increased in Sept 21, the appetite of officers to furnish the rota has not improved. This is resulting in occasions when the rota is not staffed. A paper on the effectiveness of recent changes and costed future options for the service has been prepared and was to be presented at PPE & PDS in September 22 but due to cancellation of the Committee will be presented at an alternative date. Effect: Occasional inability to deliver Out of Hours Noise Service.	Service Delivery	4	4	16	1. Annual review with MOPAC on service outcomes - Done 2. Exploring the cost of a centrally funded OOH service. Delivery models discussed with Portfolio Holder/s & member preferences advised - Done 3. Amend website to manage customer expectation - In process 4. Consider making the OOH rota mandatory in new EH enforcement work contracts, HR expressed concerns regarding this option. Currently developing potential staff pay models to discuss further with HR	4	4	16	1. Press MOPAC confirmed funding status through to 2025 and continue to bid for further funding beyond that. 2. Report to Portfolio Holder assessing service provision options for consideration to mitigate this risk. To be presented at PPE PDS Committee in January 2023. 3. Continue to encourage officers to participate in rota as the number of volunteers remains low.	Colin Brand/Louise Watkinson
12	30	Public Protection	Integrated Offender Management Failure to contribute to IOM in Bromley	Causes: IOM functions are reliant on grant funding from MOPAC. Their contribution equates to one officer day a week for IOM work. Potential for short notice reduction or cessation of the grant. 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. Current grant ends in March 2025 with bids for extension due in Autumn 2024.	Sarah Newman
13	31	Public Protection	Community Impact Day Co-ordinator post: Failure to deliver ASB problem solving and partnership activity	Cause(s): -This post receives funding from a MOPAC grant for 1 year at a time, thus is vulnerable. This post is responsible for delivering targeted community improvement project work to reduce crime and ASB in 4 priority wards with partner agencies. Potential for short notice reduction or cessation of the grant. Effect: -Inability to fund this post would result in the disruption/cessation of targeted Community Impact Day work with partners. MOPAC funding for this post is reducing in real terms year on year. The shortfall in funding for a full time officer is currently being met by the Public Protection salaries budget.	Service Delivery	3	4	12	1. Annual review with MOPAC on CID project outcomes. The review of project outcomes to determine if the days could be delivered on a reduced budget resulted in the answer - no they cannot. CIDs would have to be reduced in scope and outcomes or cease.	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. Current grant ends in March 2025 with bids for extension due in Autumn 2024.	Sarah Newman
14	32	Public Protection	Gangs & Serious Youth Violence Officer Failure to deliver gang problem solving and partnership activity	Cause(s): -This post has funding from MOPAC for 1 year at a time, thus is vulnerable. The post is responsible for the strategic coordination of gang intervention and reduction in serious youth violence. Potential for short notice reduction or cessation of the grant. Effect: -Inability to fund this post would result in the cessation of strategic coordinated gang disruption work with partners. The salary shortfall of this post is currently met by Public Protection salaries budget.	Service Delivery	3	4	12	1. Annual review with MOPAC on service outcomes	3	4	12	1. MOPAC funding is outside of the control of LBB. The grant bid for 2022/23 has been successful. Current grant ends in March 2025 with bids for extension due in Autumn 2024.	Sarah Newman

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:	09/01/2023
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
15	33	Public Protection	The provision of 24/7 CCTV Monitoring	Cause: -On-going COVID 19 Pandemic Effect: -Loss of officers through sickness arising from a potential future waves 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
16	34	Public Protection	Loss of Income from Licensed Premises	Cause: -COVID-19 pandemic and its impact on achieving income from premises 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 for some time in future due to businesses not surviving the financial impacts of the pandemic and wider economic trends such as inflation and its impact on hospitality.	Financial	3	4	12	1. The Council's Covid-29 business support schemes offered 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 was an assumption that the loss of use of the licence would be covered under the discretionary grants. For most businesses the licence is a minor cost and they are more concerned with significant overheads such as energy, staffing, materials costs, rents, and rates. Expected income targets are not being met, the Division has used C-19 COMF funding to maintain a balanced budget thus far, but may have to look to mitigate the shortfall by reducing expenditure to maintain a balanced budget. 2. Licensing income for 2022/23 will remain reduced as a result of business closures. An accurate forecast is not available in the current economic climate.	3	3	9	1. Monitor and review income quarterly	Sarah Newman
17	35	All E&PP	Risk to Health - Ill health resulting from enforcing Health Protection Coronavirus Restrictions Regulations 2020 or from operating public sites	Cause: -COVID-19 pandemic and the national requirements that Environmental Health and Trading Standards Officers enforce the COVID-19 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 arm's 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) are provided to staff and must be used in accordance with C-19 risk assessments. 2. Assessments for bulky waste collections undertaken via telephone. Currently no enforceable C-19 controls, just government advice.	3	3	9	To ensure risk assessments for all service areas are regularly reviewed	Colin Brand
18	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-19 Effect: -Additional estimated costs (£238k staffing £57K post mortems) over current 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 Public Protection Division would look to mitigate any additional spend by reducing expenditure within the division/department to maintain a balanced budget. 2. With regard to the potential additional spend on staffing etc - The Director of Environment & Public Protection has challenged the appropriateness of the required spend. Until such time that the requested necessary evidence is presented to support the cost increases, Bromley payments will be made in accordance with, and within, the constraints of the contract budget. Separate payments will be made to cover additional costs (e.g. inquests) as and when they are incurred.	Colin Brand/Louise Watkinson
19	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	1. Software updates in May 21 improved the performance of the Uniform system. The division is currently in the process of upgrading the software to Idox Cloud which is expected to be implemented in April/May 2023.	3	4	12	1.Idox Cloud will mitigate the reliance on the Civic Centre servers as the new system is Cloud based. The project commenced in late September and is currently on course to be fully implemented in April/May 2023	Rob Vale
20	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): -Increased injuries to staff, potential 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) in place and regularly reviewed 2. Accident & incident reporting system (AR3 & Riddon) fully utilised by staff and managers 3. Contractor inspection electronic H&S reporting systems in place 4. Interface with Corporate Risk Management Group 5. Fire responsible persons list in place for all sites under the control of E&PP 6. EPP Health and Safety Committee meets regularly to review departmental Health and Safety arrangements. 7. 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. 6. Ensure any staff use lone working devices when carrying out site inspections and managers have access to track the devices	Lucy West

ENDS

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Agenda Item 16

Report No.
CSD 23023

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker:	PUBLIC PROTECTION AND ENFORCEMENT POLICY DEVELOPMENT & SCRUTINY COMMITTEE		
Date:	31st January 2023		
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
 - 1.3 The dates for the next calendar year will be subject to confirmation from GP&L
 - 1.4 The detailed work programme for the next calendar year will be subject to discussions between the AD for Public Protection, Chairman and relevant officers.
-

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: 2022/2023 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 2022/2023 with the Chairman and officers.
- 3.4 Please note that the calendar of meetings for 2022/2023 has not been finalised yet and will be discussed at the GP&L Committee on 8th February.

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---31st January 2023

Matters Outstanding
PPE Performance Overview report
Portfolio Holder Update
Draft Budget Report
Public Protection Risk Register Update
Scrutiny and Minutes of the previous meeting of the Safer Bromley Partnership Strategic Group
Out of Hours Noise Service
Houses Of Multiple Occupation--Member Update
Bromley Domestic Abuse Services--Information Paper
Work Programme

PUBLIC PROTECTION AND ENFORCEMENT PDS---28th March 2023

Matters Outstanding
Presentation from Bromley Youth Council
PPE Performance Overview report
Portfolio Holder Update
PP&E Draft Portfolio Plan
Budget Monitoring
Contracts Register Report
Public Protection Risk Register Update
Resilience and Business Continuity Annual Update
Scrutiny and Minutes of the previous meeting of the Safer Bromley Partnership Strategic Group
Update from South London and Maudsley Home
Work Programme
PPE Enforcement Activity Update

PUBLIC PROTECTION AND ENFORCEMENT PDS---28th June 2023

Matters Arising
Portfolio Holder Update
PPE Performance Overview report
Budget Monitoring
Contracts Register Report
Public Protection Risk Register Update
Scrutiny and Minutes of the previous meeting of the Safer Bromley Partnership Strategic Group
Work Programme

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